## Appendices

<table>
<thead>
<tr>
<th>Page</th>
<th>Appendix</th>
</tr>
</thead>
<tbody>
<tr>
<td>58</td>
<td>Appendix A</td>
</tr>
<tr>
<td>61</td>
<td>Appendix B</td>
</tr>
<tr>
<td>67</td>
<td>Appendix C</td>
</tr>
<tr>
<td>72</td>
<td>Appendix D</td>
</tr>
<tr>
<td>74</td>
<td>Appendix E</td>
</tr>
</tbody>
</table>
# Table of Contents

2 Introduction
4 Northwestern University Police and Local Law Enforcement
6 Crime Prevention and Safety
8 Protective Measures
9 Crime Reporting
11 Clery Crime Statistical Reporting
14 Sexual Misconduct*

Page 37  Appendix A: Resource of Relevant Terms and Definitions in Illinois
Page 39  Appendix B: Pamphlet: “You Have Options. We Can Help: Northwestern University Resource Guide on Sexual Misconduct and Title IX”
Page 40  Appendix C: Resources Not Subject to Reporting Obligation
Page 41  Appendix D: Sexual Misconduct Complaint Resolution Process

42 Timely Warnings. Emergency Notifications and Emergency Preparedness
Page 48 Step 1: Critical Incident Assessment
Page 49 Step 2: Incident/Protective Action Communications
Page 50 Step 3: Evaluate Incident Response

53 Campus Facilities and Building Security
54 Miscellaneous

*Appendices A, B, C and D are specific to the external University policy and these alpha indicators do not apply to the appendices section in this Annual Security Report.
Introduction

Northwestern University is committed to promoting the safety and security of the University community—students, faculty and staff, as well as University vendors, contractors, visitors, guests, and third parties. Colleges and universities are required by various federal laws and regulations to disseminate information related to campus safety and security. The Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act, as amended by the Violence Against Women Act (VAWA), (collectively referred to as the “Clery Act”), requires colleges and universities to disclose certain timely and annual information about campus crime, and security and safety policies. In addition, the Higher Education Opportunity Act (HEOA) requires colleges and universities with student residence facilities to publish a Fire Safety Report, which contains information about fire prevention practices and systems, as well as fire-related statistics. The HEOA also requires colleges and universities with student residence facilities to provide information related to missing students.

The material in this Annual Security Report (ASR) provides critical information related to safety and security at the Northwestern University Kellogg School of Management Miami Campus located in Coral Gables, Florida. In addition, select information from the ASR for the University’s Evanston and Chicago campuses has been included, as community members may visit these campuses, as well. For additional Chicago and Evanston campus information, review the related Annual Security and Fire Safety Report which can be accessed at www.northwestern.edu/up/safety/annual-report/index.html.

All members of the University community are encouraged to read the ASR. We hope that you will use the information to help foster a safe environment for yourself and others. But it is important to stress that safety is a shared responsibility. The University relies on every community member to contribute to safety and security on campus by reporting crime and suspicious activities in a timely manner, and by using common sense when going about daily activities.
About the Miami Campus

The Kellogg—Miami Campus administrative and classroom areas are located on the first and second floors in the Alhambra Plaza building (90 Alhambra Plaza) and Alhambra West (95 Merrick Way) in Coral Gables. The school is primarily a commuter campus. The Hyatt Regency Coral Gables hotel (adjacent to the Kellogg—Miami Campus) is typically utilized several weekends each month by the Kellogg School of Management to house students participating in the program. Clery Act reported crimes occurring during the time frame Northwestern University students are in residence at the Hyatt hotel are included in the non-campus crime data table category. The University does not own or lease any student residences at this campus, and there are no buildings or property owned or controlled by officially recognized non-campus student organizations.

Information about This Report

This Report contains critical information about campus safety and security. In this Report, you will find information about:

I. Northwestern University Police and Local Law Enforcement
II. Crime Prevention and Safety
III. Protective Measures
IV. Crime Reporting
V. Clery Crime Statistical Reporting
VI. Sexual Misconduct
VII. Timely Warnings, Emergency Notifications and Emergency Preparedness
VIII. Campus Facilities and Building Security
IX. Miscellaneous

Appendices
A. Kellogg – Miami Campus Trainings (Specifically Focused On Sexual Assault, Domestic Violence, Dating Violence and Stalking)
B. Clery Act Crimes and Geography (Definitions)
C. Supplemental Kellogg—Miami Campus Sexual Misconduct Policy Content
D. Local and University Resources
E. Crime Data: for Kellogg—Miami Campus

The Northwestern University Police Department is responsible for preparing and distributing this Report. We work with the Kellogg—Miami Campus administration, the Coral Gables Police Department and a number of other University departments such as Student Affairs, University Relations and the Office of the General Counsel to compile this information. University community members are annually notified via a campus wide email of the availability of the

Paper copies of this Report are available from the University Police Department. To request a paper copy, please contact the University Police at universitypolice@northwestern.edu or 847-491-3256.

I. Northwestern University Police and Local Law Enforcement

The Kellogg—Miami campus does not have Northwestern University Police or security personnel on site.

However, on the Evanston and Chicago campuses, the Northwestern University Police Department has primary responsibility for developing and deploying services, programs and strategies for maintaining a safe Evanston and Chicago campus. Specifically, University Police is responsible for Evanston and Chicago campus crime prevention, law enforcement, parking control, emergency response, residence hall security, policing of special events, and for various other community services. University Police personnel patrol the campuses on foot, bicycle, and vehicle.

University Police provides a full range of law enforcement services, 24 hours a day/365 days a year. Some of these services include investigating criminal incidents or referring matters (as appropriate) to another University office (e.g., Human Resources, the Office of Student Conduct). University Police operations are supported by a Communications Center which is staffed by trained and certified dispatchers who answer calls for service; dispatch officers and other emergency services to incidents; and monitor CCTV systems and intrusion, fire, and environmental alarms.

University campus safety and security are dependent upon the teamwork of all members of the Northwestern community. Members of the University community are encouraged to immediately report campus crimes, suspicious activity, accidents, and other emergencies to local law enforcement and University Police. In an emergency dial 911. For non-emergencies, call 847-491-3456 or email universitypolice@northwestern.edu.

A. University Police Authority

University Police police personnel derive their law enforcement authority from State of Illinois statutes (110 ILCS 1005/0.01-3.0)/Private College Act) and the trustees of Northwestern University. University Police police personnel have the same full law enforcement responsibilities and powers (including the power to arrest) under state law as municipal police officers and county sheriffs. Sworn police personnel must complete a state approved police academy and firearms training.
B. Jurisdiction

The Northwestern University Police Department have no law enforcement authority or jurisdiction on the Miami campus. The Alhambra Plaza building management provides security and is responsible for safety, security, and maintenance issues in campus buildings. Additionally, the building management operates an alert and notification system (Preparis). Should you need to contact Northwestern University Police, call 847-491-3456 or email University Police at universitypolice@northwestern.edu. The University Police Department is available 24 hours a day/7 days a week.

C. Mutual Aid

The Northwestern University Police Department does not have formal written memoranda of understanding with the Coral Gables Police Department, other local or state of Florida law enforcement agencies, or the Federal Bureau of Investigation regarding the formal investigation of criminal incidents. University Police annually requests the Coral Gables Police Department to provide timely notification of situations on or off campus that could pose a serious or continuing threat and/or any incidents that are considered an immediate threat to the health and/or safety of the Kellogg—Miami Campus community. University Police, as notified, will maintain communication with local law enforcement and request status reports on these types of incidents. In addition, University Police will collaborate with the Coral Gables Police Department and/or other local or state law enforcement agencies as formally requested by the investigating agency.

D. Emergency Contact Information

In an emergency, community members should dial 911. When calling 911 from campus, or within the city limits of Coral Gables, this connects the caller to Coral Gables Police Department Communications Section who receives and dispatches both police and fire-rescue calls for service around the clock, year round.

E. Non-Emergency Contact Information

Coral Gables Police Department
2801 Salzedo Street
Coral Gables, FL 33134
305-442-1600

Alhambra Building/Security Desk
(location of Kellogg—Miami campus)
Call 305-447-9191 (during regular business hours, 8:30 am–5 pm) or the Security Dispatch Office at 305-446-2041 (after business hours)
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: www.northwestern.edu/up

F. Dissemination of Police Contact Information

Emergency and non-emergency Northwestern University Police Evanston and Chicago campus phone numbers are also listed in the online campus phone directory at www.northwestern.edu/up/about/contact/department-directory.html and in various University and University Police websites and electronic communications distributed throughout the school year. A telephone sticker or magnet that provides University Police Evanston and Chicago campus phone numbers is available upon request by calling the non-emergency telephone number.

G. Police Availability, 24/7

University Police Evanston campus Communication Center dispatchers are available 24 hours a day to answer your calls, including calls from the Miami campus. In response to a call regarding a reported crime at the Evanston and Chicago campus, University Police personnel are dispatched to make contact with the reporting party and take a police report. University Police personnel can also assist community members in notifying the appropriate local law enforcement agency when the victim of a crime elects to or is unable (physically/mentally) to make such a report.

H. Liaising With University Officials

Crime incident reports involving University students are forwarded to the Dean of Students Office for review and referral to the Office of Student Conduct for potential action. The University Police Criminal Investigations Division is assigned to investigate and follow-up on reported incidents when deemed appropriate. Information obtained via the University Police investigative process, as applicable, is also forwarded to the Office of Student Conduct. If assistance is required from other University departments and/or law enforcement agencies with jurisdictional authority, University Police will contact and work with the appropriate department(s)/agencies.

II. Crime Prevention and Safety

Northwestern University is committed to promoting the safety and security of the university community. Although Northwestern University works hard to ensure the safety of all individuals within
our University community, everyone must take responsibility for their own personal safety and property security.

The Kellogg—Miami campus is not a sanctuary from crime. Conditions that encourage criminal activities prevail in highly populated metropolitan locations. Realizing you could be a victim is the first step in self-protection.

Northwestern University Police does not offer in person crime prevention or safety/security education programs on the Kellogg—Miami campus. Students and employees are encouraged to participate in safety, security, and crime prevention programs that are offered during orientations and which may be offered locally. Students and employees are made aware of safety, security, and crime prevention publications and related web based resources. Online crime prevention/safety information is available at www.northwestern.edu/up/crime/safety-tips.html. Printed materials on various topics (including copies of this Report) are available on site or upon request.

A. Prevention

Simple, common-sense proactive precautions are the most effective means of maintaining personal safety and property security. Individuals who practice crime prevention can make this special community a safer place to learn and work.

The common tenets of crime prevention are straightforward: remain alert and attentive to potential dangers; don’t put yourself or your property at risk; and immediately report suspicious activity to the police. A safe and secure campus is everyone’s responsibility. Community members are encouraged to visit the University Police website to access a variety of information on safety, security, and crime prevention at www.northwestern.edu/up.

B. Theft

Typically, theft is the most reported crime on campus. Theft prevention is the anticipation, recognition, and appraisal of a risk of theft and taking steps to reduce or remove that risk. The techniques outlined here are designed to reduce the opportunity for theft and increase risk for a would-be thief.

- Secure your office, dorm room, lab, etc. when you are absent.
- Secure all valuables out of sight during your absence.
- Don’t leave valuables lying around in open areas which are unattended.
- Never leave valuables and property in plain view in a parked vehicle.
- Practice vigilance: Watch for and immediately report suspicious activity and behavior.
• When contacting University Police, provide detailed information.
• Ask unescorted visitors entering your office to identify themselves and whom they are meeting.
• Request identification from persons who wish to repair or remove property.
• Report criminal incidents on a timely basis to University Police and local law enforcement.

C. Safety Programs

The University and University Police engage in comprehensive, intentional, and integrated educational programming, initiatives, strategies, and campaigns intended to promote campus safety and security and prevent crime.

Students and employees are made aware of safety, security, and crime prevention publications and related web based resources. Online crime prevention/safety information is available at www.northwestern.edu/up/crime/safety-tips.html.

Information about preventing and responding to sexual violence is available through the Center for Awareness, Response, and Education at www.northwestern.edu/care, and University Police at www.northwestern.edu/up/crime/awareness/sexual-violence/. For a listing of Kellogg—Miami campus trainings specifically focused on sexual assault, domestic violence, dating violence, and stalking, see Appendix A.

III. Protective Measures

Northwestern provides members of the University community assistance in seeking orders of protection or restraining orders. Any person who obtains an order of protection is encouraged to provide a copy to Melissa Holland, Director, Executive MBA, Miami Kellogg School of Management (melissa-holland@kellogg.northwestern.edu, 305-445-1381); University Police; and the Title IX Coordinator. An individual may also consult with University Police and Director Holland to develop a Safety Action Plan, which is a plan for University Police and the victim to reduce risk of harm while on campus or coming and going from campus.

A. Orders of Protection or Restraining Orders

University Police can assist members of the University community in seeking orders of protection or restraining orders. University Police will inform victims of sexual violence, relationship-based violence, and stalking of the options and resources available to them. For students, this may include accessing Northwestern CARE advocates. For students and other University community members, this may
also include accessing services available through the Coral Gables Police Department or other Florida based services.

Under Florida law, orders of protection or restraining orders are called “Injunctions for Protection.” For additional information on injunctions, how to get help with filing an injunction, locating an Intake Center and appropriate court house locations based on jurisdiction, the hearing process and other applicable information, see below. If you have additional questions, contact the Miami-Dade County Domestic Violence Hotline at 800-500-1119 or contact the University Police Department.

There are four types of injunctions for protection that individuals may qualify for under Florida Statute 784.046. Persons may file an injunction for protection against domestic violence, repeat violence, dating violence, or sexual violence. The Intake Center counselor will provide you with information and assist in determining what criteria matches your particular circumstances. There are several court intake locations in the community (listed below) where intake unit staff are available to assist persons with filing for an injunction for protection. Intake locations will also help with referrals to social service agencies in the community, procedural information about the court process and safety planning. If you have questions, call the 24-Hour Miami—Dade County Domestic Violence Hotline at 800-500-1119. Contact the Miami—Dade County Domestic Violence Hotline at the phone number above for Intake Center locations and hours of operation.


### IV. Crime Reporting

University community members have options in reporting crimes.

#### A. Reporting to University Police/ Coral Gables Police Department

Northwestern University encourages victims and witnesses of crimes to report all crime to University Police and the Coral Gables Police Department. However, due to the potential need to contact the crime-reporting party for follow-up investigative inquiries, University Police does not typically allow anonymous reporting of crimes, except to Campus Security Authorities (see below) where anonymity is permitted.

Police reports will often include information such as the names and identifying information related to the reporting party and the suspect
or alleged offender, an incident description, as well as names and identifying information of witnesses. Anonymous reports received by University Police may be investigated under certain circumstances.

B. Reporting to University Campus Security Authorities

As described in Section V on Clery Crime Statistical Reporting, Campus Security Authorities (CSAs) are mandated federal reporters who are required to report to University Police Clery Act crimes that they witness or become aware of. CSA submitted crime reports may assist University Police in identifying and apprehending criminals and could identify patterns that will help prevent future crimes. Reports by CSAs also assist the University in meeting its Clery Act obligations and enable University Police to review incident information and determine if reported crime poses a serious or continuing threat to the campus community which could necessitate the issuance of a timely warning, as discussed in Section VII.

Members of the University community who are victims or witness crime may report those crimes to CSAs who will, in turn, report the incident to University Police. It is important that crime reporting parties provide, and CSAs obtain, as much information about the crime as possible including: an incident description, approximate time, date and location of the incident, and as available, identifying information of the alleged offender(s) and any witnesses.

C. Anonymous Reporting

Victims and witnesses may report crimes anonymously to Campus Security Authorities (CSAs). Clery reportable crimes, occurring within the Clery reportable geography, that are reported to University Police by CSAs are included in the Annual Security Report crime data. With such data, the University can maintain accurate records of the number of incidents to determine if there is a pattern of crime with regard to a particular location, method, or offender, and as appropriate, alert the community to potential danger.

In reporting crime to a CSA when the reporter wishes to be anonymous, CSAs will provide to University Police a detailed description and occurrence date (time frame) and location of the crime, without identifying the alleged victim, witnesses, or perpetrator. The purpose of this type of report is to comply with the reporting party’s wish to keep the matter anonymous, while taking steps to contribute to future campus safety.
D. Reporting Sexual Misconduct

As discussed in Section VI on Sexual Misconduct below, Northwestern prohibits all forms of sexual misconduct, including but not limited to, sexual assault, stalking, dating or domestic violence, and sexual harassment. Many sexual misconduct offenses also are crimes in the state or locality in which the incident occurred. For this reason, Northwestern 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.

More information related to sexual misconduct, including options and resources available, and options for reporting, is covered in Section VI.

V. Clery Crime Statistical Reporting

Among other things, the Clery Act requires colleges and universities to maintain and disclose statistics about the number of incidents of specific crimes that are reported to local police agencies, University Police or campus security authorities (CSAs). These specific crimes are referred to as “Clery crimes” and are listed below. The crime statistics must include the three most recent calendar years.

A. Clery Crimes:\1

1. Criminal homicide
   a. Murder and non-negligent manslaughter
   b. Manslaughter by negligence
2. Sexual assault*
   a. Rape*
   b. Fondling*
   c. Incest*
   d. Statutory rape*
3. Dating violence or domestic violence
4. Stalking
5. Robbery
6. Aggravated assault
7. Burglary
8. Motor vehicle theft
9. Arson
10. Arrests for liquor law violations, drug law violations and illegal weapons possession
11. Referrals for disciplinary actions for liquor law violations, drug law violations and illegal weapons possession

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1. The list of Clery Crimes was amended by US Department of Education regulations, effective July 1, 2015. These regulations generally recategorized listed sex offenses. New categories are identified with an "*". For reporting years prior to 2015, sex offenses, instead of “sexual assault” included (1) forcible sex offenses: (a) rape, (b) forcible sodomy, (c) sexual assault with an object, and (d) forcible fondling; and (2) non-forcible sex offenses: (a) incest; (b) statutory rape.
12. Hate crimes associated with any of the crimes listed in points 1-9, any crime involving bodily injury or associated with a larceny-theft, simple assault, intimidation or destruction/damage/vandalism of property.

These crimes are defined in Appendix B. Appendix E includes crime statistics for the Kellog-Miami campus.

**B. Clery Geography**

Under the Clery Act, reported crimes must have occurred on, or within, what is referred to as the institution’s “Clery geography.” This includes property located in the following areas:

*On-Campus:* Any building or property owned or controlled by an institution within the same reasonably contiguous geographical area and used by Northwestern in direct support of, or in a manner related to, institutional educational purposes, including residence halls; and any building or property that is within or reasonably contiguous to the geographical area mentioned in the above definition, that is owned by Northwestern but controlled by another person, is frequently used by students, and supports institutional purposes (such as a food or other retail vendor).

*Non-Campus:* Any building or property owned or controlled by a student organization that is officially recognized by the institution; or any building or property owned or controlled by an institution that is being used in direct support of, or in relation to, the institution’s educational purposes, is frequented by students and is not within the same reasonably contiguous geographic area of the institution.

*Public Property:* All public property, including thoroughfares, streets, sidewalks, and parking facilities, that is within the campus, or immediately adjacent to and accessible from the campus.

**C. The Role of Campus Security Authorities**

Campus Security Authorities (CSAs) are federally mandated crime reporters, and include both University Police, as well as certain University officials and staff. CSAs are obligated to report Clery crimes that they witness or they become aware of which occurred on or within Northwestern University’s Clery Geography (generally including on campus, in public areas bordering campus, and in certain non-campus buildings owned or controlled by the University) on a timely basis. However, CSAs are encouraged to report all crimes reported to them to University Police and local
law enforcement. Note, if the reported crime or incident involves an emergency, the CSA should immediately call 911.

The intent of including non-law enforcement personnel in the role of CSA is to acknowledge that some community members, and students in particular, may be hesitant about reporting crimes to the police, but may be more inclined to report incidents to other campus-affiliated individuals.

D. Who Is a Campus Security Authority at Northwestern?

The Clery Act identifies four categories of University employees who may qualify as CSAs:

1. University Police;
2. Non-police security staff responsible for monitoring University property;
3. People/offices designated under Northwestern University policy as those to whom/which crimes should be reported; and
4. Officials with significant responsibility for student and campus activities.

However, a pastoral or professional counselor who is functioning within that scope at the time a crime is reported is not considered a CSA and not required to report crime to which they become aware but is encouraged to review crime reporting options with reporting party.

The University offers an online CSA training program that covers, among other things, the duties and responsibilities of CSAs, how to report crime to which they become aware, and resources and services to refer victims of crimes. For additional information on the role of CSAs and the CSA training program, visit the University Campus Security Authority web page (http://www.northwestern.edu/up/safety/campus-security-authorities.html).

E. Crime Statistics Compilation/Crime and Fire Log

University Police collect information and data related to Clery crimes through a number of sources which are used to compile the crime statistical data in Northwestern’s ASR. Crimes (Evanston and Chicago campuses) and residential fires (Evanston campus only), and other incidents reported to University Police are reported on the University Police Blotter. The Blotter is updated Monday through Friday, excluding University holidays, and is available at www.northwestern.edu/up/safety/blotter/index.html. The Blotter is also available for review at kiosks located in the lobbies of the Chicago and Evanston University Police offices. The information in the Blotter
typically includes the nature, date, time, general location, and disposition of each incident. Blotter records associated with reported on campus fires, occurring in on campus student housing, includes the nature, date, time and general location of each reported fire.

The Coral Gables Police Department and Kellogg—Miami campus administrators are contacted and asked to provide crime, arrest, and student disciplinary referral (Kellogg only) data as required by the Jeanne Clery Disclosure of Campus Security and Campus Crime Statistics Act. If reports in these categories are made to the Northwestern University Police Department, those incidents are also included in the Clery crime totals presented in Appendix E.

Statistical data available from these sources is compiled and included in this annual Report and in reports available on U.S. Department of Education website. Incident information that appears in the Blotter and in this Report, as well as data that is sent to the U.S. Department of Education does not contain personally identifiable information.

VI. Sexual Misconduct

A. Sexual Misconduct Policy

Northwestern has established a policy prohibiting sexual misconduct which explains options and resources available for members of the University community and how reported incidents are handled. The policy is available online at http://www.northwestern.edu/sexual-misconduct/docs/sexual_misconduct_policy.pdf and is included below.

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 to take an active role in upholding this policy and promoting the inherent dignity of all individuals.

Who Approved This Policy

Provost
Executive Vice President
Vice President of Student Affairs

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 state2 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 state3 in which the incident occurred.

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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 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.
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 present;
- 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.

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:

4 Breast-feeding a child is not indecent.
• 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.

**Procedures**

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)

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-depart-ment-servcies (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.presencehealth.org/presence-saint-francis-hospital-evanston-emergency-care

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 and 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**

| Resource | Evanston Campus | Chicago Campus | 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.
| CARE: Center for Awareness, Response & Education* | 633 Emerson Street, 3rd Floor | 633 Emerson Street, 2nd Floor | 2000 Sheridan Road |
| | 847-491-2054 | 847-491-2151 (24-hours) | 847-491-7360 |
| | care@northwestern.edu | 847-491-2151 (after hours) | womenscenter@northwestern.edu |
| | www.northwestern.edu/care | | www.northwestern.edu/womenscenter/ |
| Women’s Center Counseling Services | Evanston Campus: | Chicago Campus: | Provides counseling services for faculty, students and staff members.
| | 2000 Sheridan Road | Abbott Hall, Suite 1400 |
| | 847-491-7360 | 710 North Lake Shore Drive |
| | | 312-503-3400 |
| | | womenscenter@northwestern.edu |
| | | www.northwestern.edu/womenscenter/ |
| CAPS: Counseling and Psychological Services | Evanston Campus: | Chicago Campus: | Provides counseling services to students, also provides a counselor on-call 24 hours a day.
| | 633 Emerson Street, 2nd Floor | Abbott Hall, 5th Floor |
| | 847-491-2151 (24-hours) | 710 N. Lake Shore Drive |
| | | 312-503-0936 |
| | | 847-491-2151 (after hours) |
| | | www.northwestern.edu/counseling/ |
| Office of the University Chaplain/Office of Religious Life | Evanston Campus: | Chicago Campus: | Provides spiritual counseling and advice for all members of the University community.
| | 1870 Sheridan Road | 847-491-7256 |
| | 847-491-2151 (24-hours) | 847-864-7865 (after hours) |
| | | chaplain@northwestern.edu |
| | | www.northwestern.edu/religious-life/ |
| Faculty and Staff Assistance Program | Evanston Campus: | 855-547-1851 (24 hours) | Provides confidential crisis intervention and short-term counseling for faculty and staff, as well as their household family members at no cost.
| | 1870 Sheridan Road | http://www.northwestern.edu/hr/work-life/faculty-staff-assistance-program.html |

* CARE is a confidential advisor under the Illinois Preventing Sexual Violence in Higher Education Act.
# Off-Campus Confidential Resources

| Hotlines | Chicago Metro Rape Crisis Hotline (YWCA): 888-293-2080  
|          | Chicago Domestic Violence Line: 877-863-6338  
|          | Evanston Domestic Violence Line (YWCA): 877-718-1868  
|          | RAINN: Rape, Abuse & Incest National Network  
|          | 800-656-HOPE  
|          | https://ohl.rainn.org/online  
|          | (online hotline)  
|           | 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.  
|           | 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.  
| Center on Halsted (LGBTQ Services) | 3656 N. Halsted St., Chicago  
|           | LGTBQ Violence Resource Line: 773-871-2273  
|           | http://www.centeronhalsted.org/  
|           | Services include: Counseling services; connecting individuals with professional help, law enforcement, agencies, services, and other providers.  
| Rape Victim Advocates | Main Office: 180 N. Michigan Ave., Suite 600, Chicago  
|           | 312-443-9603  
|           | www.rapevictimadvocates.org  
|           | Services include: medical and legal advocacy, counseling services (individual and group). Services are free and for survivors or friends/partners of survivors.  
| YWCA- Evanston | 1215 Church St., Evanston  
|           | 847-864-8445  
|           | www.ywca.org/evanston  
|           | Services include: Counseling and support for survivors of dating/domestic violence, legal advocacy and residential services (emergency shelter).  
| Evanston Victim Services Program | Evanston Police Department  
|           | 1454 Elmwood Ave., Evanston  
|           | www.cityofevanston.org/police/about-us/police-social-services/  
|           | Services include: crisis intervention for survivors of sexual violence and/or dating/domestic violence, medical and legal/court advocacy.  
| Life Span Center for Legal Services and Advocacy | 70 E. Lake St., Suite 700, Chicago,  
|           | 312-408-1210  
|           | life-span@life-span.org  
|           | www.life-span.org  
|           | Services include: (for survivors of DV and SV and stalking): legal services, legal advocacy (i.e. assistance with Orders of Protection, etc.) and counseling.  
| Center for Contextual Change | 9239 Gross Point Road, Skokie  
|           | 847-676-4447 x304  
|           | (for appointments or a confidential assessment)  
|           | www.centerforcontextualchange.org  
|           | Services for survivors of sexual and domestic/dating violence: individual and group counseling.  
|           | Services for perpetrators of sexual and domestic/dating violence: individual and group counseling.  
| Porchlight Counseling Services | 773-750-7077  
|           | (confidential helpline and intake)  
|           | www.porchlightcounseling.org  
|           | Services include: free counseling for survivors of sexual and/or domestic/dating violence.  
| KAN-WIN | 2434 E. Dempster St., Suite 111, Des Plaines  
|           | 773-583-1392  
|           | www.kanwin.org  
|           | 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.  

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/index.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 Avenue, 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:
https://cm.maxient.com/reportingform.php?NorthwesternUniversity&layout_id=31
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 imme-
mediate 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, Room 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 D.

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 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 commu-
nities 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

**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: Resources Not Subject to Mandatory Reporting

Appendix D: Sexual Misconduct Complaint Resolution Process

Appendices A, B, C and D are specific to the external University policy and these alpha indicators do not apply to the appendices section in this Annual Security Report.

**History/Revision Dates**

Origination Date: January 13, 2014
Last Revision Date: September 12, 2016

**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 positions 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.

5 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.
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).

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.
Appendix C

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)\(^7\)
- 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.

\(^7\) 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.
Appendix D

Northwestern University’s Sexual Misconduct Complaint Resolution Process can be found at: http://www.northwestern.edu/sexual-misconduct/university-policy/process.html.

END OF SEXUAL MISCONDUCT POLICY

Information and Options for Survivors of Sexual Misconduct Abroad

Northwestern’s Policy on Sexual Misconduct prohibits sexual assault, sexual exploitation, stalking, dating and domestic violence, and sexual harassment, whether on-campus or off-campus. Students studying abroad are covered under this policy and the procedures it provides. The University has resources and advocacy services available to students abroad. As the accessibility of resources and applicable local laws and policies vary abroad, Northwestern will work closely with the student to create a safe environment and prioritize healing. For additional information visit http://www.northwestern.edu/study-abroad/guide/health-and-safety/emergencies/information-and-options-for-survivors-of-sexual-misconduct-abroad.html.

Campus Sex Crimes Prevention Act (Sex Offender Registration)

The federal Campus Sex Crimes Prevention Act requires institutions of higher education to issue a statement advising the campus community where information concerning registered sex offenders may be obtained. Persons convicted of certain sex offenses are required by law to register with the State. A current listing of registered sex offenders is available at:

Florida: http://offender.fdle.state.fl.us/offender/homepage.do
Illinois: www.isp.state.il.us/sor/.

For information on registered sex offenders who may be employed or attend school on the Northwestern University Miami (Coral Gables) campus, contact the Coral Gables Police Department at 305-442-1600. For corresponding information on the Northwestern Chicago and Evanston campuses, contact University Police Criminal Investigations at 847-467-0654.

Campus Sexual Misconduct Climate Survey

In May of 2015, Northwestern launched its first student campus climate survey on sexual misconduct. The survey contained questions related to sexual misconduct incidence, attitudes, and awareness of resources. A report containing the results of the survey was pub-

After reviewing the report, the Title IX Coordinating Committee, the Campus Coalition on Sexual Violence (CCSV) Climate Survey Working Group, and Associated Student Government’s “It’s on Us” Committee each submitted recommendations in Winter 2016 for consideration of the administration. A June 20, 2016 report Campus Climate Survey: From Recommendations to Actions http://www.northwestern.edu/sexual-misconduct/docs/campus-climate-survey-recommendations-and-actions-6-20-16.pdf summarizes recommendations and key action steps Northwestern is taking to strengthen sexual misconduct response, resources, and prevention initiatives. These recommendations and action steps are part of an ongoing effort by Northwestern to promote a safe and supportive campus for all members of the community.

VII. Timely Warnings, Emergency Notifications and Emergency Preparedness

A. Timely Warnings

Timely Warnings, in the form of a Crime Alert, are issued by the University in a timely manner to members of the affected campus community for all Clery Act reportable crimes occurring in the Clery defined geography and reported to University Police or a Campus Security Authority, when it is determined there is a serious or continued threat to the community. The purpose of issuing a Timely Warning is to give members of the University community information that will allow them to alter their behavior in order to protect their personal safety.

Clery Act reportable crimes include: aggravated assault, arson, burglary, dating violence, domestic violence, hate crimes, motor vehicle theft, murder and non-negligent manslaughter, negligent manslaughter, robbery, sex offenses (both forcible and non-forcible) and stalking.

Clery defined geography includes: campus (including residence halls), non-campus buildings or property, and public property, as defined by the Clery Act.

Decisions regarding whether to issue a Timely Warning are made on a case by case basis by the Associate Vice President & Chief of Police, Safety and Security, (or designee) taking into account the following:

- Whether the incident has been reported to University Police or a Campus Security Authority in a timely manner,
- The nature of the crime reported,
• Location of the crime, and
• Whether there is a serious or continuing threat to the University community.

The Associate Vice President & Chief of Police, Safety and Security, (or designee) will consult with the Vice President of University Relations (or designee) about the alert, when time permits. Depending on the factors being considered, the Associate Vice President & Chief of Police, Safety and Security, may also consult with other members of senior leadership such as the Vice President of Student Affairs, or the Vice President and General Counsel.

When it is determined that a Timely Warning will be issued, the Associate Vice President & Chief of Police, Safety and Security, (or designee) and the Vice President of University Relations (or designee) will create a Crime Alert and disseminate it to the designated community members via bulk email. It will also be posted to the University Police webpage (http://www.northwestern.edu/up/safety/crime-alerts/). Crime Alerts made through the bulk email system are not the same as Emergency Notifications (see section VIII (B.) Emergency Notifications) issued via phone calls, text message, outdoor sirens and other emergency notification mechanisms.

Timely Warnings will typically include the date, time, location of occurrence, and a description of the incident. They will also include additional information that could aid community members in altering their behavior to protect their personal safety and minimize additional incidents from occurring. Timely Warnings will not include the names and other personal identifying information of crime victims/survivors.

An alert may not be sent if there are factors that reduce the level of threat to the community. Examples of factors that might reduce the level of threat are an arrest of the suspect in the incident or a delay in the reporting of the incident.

The Clery Act does not require universities to issue Timely Warnings on Clery reportable crimes occurring outside of the Clery defined geographic area or for non-Clery reportable crimes. However, the University may choose to initiate a Timely Warning for crimes outside the Clery guidelines when an event represents a serious or continuing threat to the community.

B. Emergency Notifications

An Emergency Notification is used to inform the University community about a significant emergency or dangerous situation involving an immediate threat to the health or safety of the campus community. Emergency Notifications are different than Timely Warnings, in that they are not restricted to Clery reportable crimes. Incidents such as
fire, weather emergencies, criminal activity, or a hazardous materials spill could trigger an Emergency Notification, but may or may not also warrant a Timely Warning. For additional information on community emergency notifications, see section VIII C.

The Northwestern University Police Department (NUPD) will typically be made aware of emergency situations by receiving a call to the NUPD communications center. Upon confirmation of an emergency or threat, either by emergency personnel or a firsthand witness, the Associate Vice President & Chief of Police, Safety and Security, (or designee) will determine if an alert to the entire campus or a segment of the campus is appropriate. This is based on the size, scope, and complexity of the emergency and the potential affected area(s) or persons. These messages can be immediately sent by NUPD Dispatchers in the communications center or other authorized users through a secure web-based platform. While a number of pre-scripted messages are available, the exact message content is determined by the Associate Vice President & Chief of Police, Safety and Security, (or designee) based upon the particular circumstances of the emergency.

As an emergency situation escalates, or is resolved, the University will send additional alert(s) to update the appropriate segment(s) of the campus community. This type of communication may describe the nature of the risk, include specific actions to be taken, or declare the emergency no longer exists (all clear). In situations where time allows, consultation with others, such as representatives of University Relations or Campus and Student Life, may take place regarding these communications. If emergency notification systems fail, the crisis management team will initiate emergency actions and communicate life safety guidance in conjunction with activation of building emergency action plans.

C. Emergency Preparedness and Notification

The University’s Emergency Response Framework (http://www.northwestern.edu/up/emergency/emergency-response-framework/) identifies key decision makers and their roles during a campus emergency. The plan establishes planning cycles for emergency command center incident management that will be utilized during identified emergencies and crisis events.

Emergency Notification

Northwestern has several different means of communications that may be used in the event of an emergency that affects one or all of the Northwestern University campuses. These systems include an Emergency Notification System that combines phone calls, text messaging and e-mails and social media; an outdoor alert system (Evanston campus); a bulk e-mail system; posting messages on the University’s website; and other methods of disseminating informa-
tion, including but not limited to, posting fliers in public places, faxes and notifying local media. On the NU-Q (Qatar) campus social media messaging through Blackboard Connect, such as Twitter, is not utilized. All communication/notification methods identified herein are available on all Northwestern University campuses (Chicago, Evanston, Miami, Qatar and Washington, D.C.) unless otherwise specifically identified as being limited to a particular campus.

**Emergency Communication Capabilities**

*Emergency Notification System:* Blackboard Connect is a notification service provided by an outside vendor that can call phones, send text messages, email information and send social media messages (via Twitter) rapidly when activated to alert community members. Because Northwestern might need to contact its community members before arrival on campus in an urgent emergency situation, Northwestern encourages its community to ensure that their contact information is current in the Blackboard Connect database. For instructions on how University community members can enter or update their Emergency Contact information, visit [http://www.northwestern.edu/ses/students/emergency-information/add-or-update-emergency-contacts.html](http://www.northwestern.edu/ses/students/emergency-information/add-or-update-emergency-contacts.html) (student) or [https://nuhr.northwestern.edu](https://nuhr.northwestern.edu) (employee).

*Bulk Email System:* Bulk Email is a service provided by Northwestern University Information Technology that can send messages to University email accounts. Northwestern uses this service to send information to the campus community as appropriate.

*Main Website “Breaking News:”* Breaking News at [www.northwestern.edu](http://www.northwestern.edu) is a web page on the Northwestern website that can be activated in the event of an emergency. This page will provide emergency notification information and recommend protective action to be taken if needed.

*Outdoor Alert System (Evanston campus):* The Outdoor Alert System provides the ability to broadcast live voice, emergency tones and pre-recorded voice messages to all siren locations simultaneously or to any select siren location(s). The outdoor system is designed to enable the University to communicate with those people who may be outside on the Evanston campus. It is not expected that messages broadcast via this method will be audible inside buildings on campus. Broadcast of an outdoor alert system on the Chicago campus is not feasible at this time.

**University Police Role**
The University Police Department is integral in providing critical information in an accurate and timely manner that can be used by senior University administrators to assess the need to authorize and issue emergency communications to the university community. On receiving notification of an impending incident, Northwestern
University Police Department management will take actions consistent with this procedure to activate and alert emergency management officials to assess the need to notify the community to take protective actions.

Authorization to Direct System Activation
The following individuals or their designees are authorized to direct that the Emergency Notification System and/or Outdoor Alert System be activated: President; Provost; Executive Vice President; Vice President for University Relations; the Associate Vice President & Chief of Police, Safety and Security; Assistant Vice President/Deputy Chief; Deputy Chief of Police; University Police Commanders; or the senior on-duty University Police supervisor.

Content Development and System Initiation
The Associate Vice President & Chief of Police, Safety and Security, (or designee, typically the Assistant Vice President/Deputy Chief or Deputy Chief) develops the content of emergency messages and timely warnings in consultation with the Vice President for University Relations (or designee, typically the Director or Associate Director of Media Relations). Together they agree to initiate any or all of the emergency notification systems. The Vice President for University Relations (or his designee, typically the Director or Associate Director of Media Relations) is responsible for completing processes necessary to disseminate messages on any and all emergency notification systems. Should designated University Relations administrators be unable to initiate any or all of the emergency notification systems, then select University Police administrators or Communications Center staff (Police Commander, Director of Emergency Management, Director of Security Systems/Technical Services, and Communications Officers) have the ability to initiate any or all emergency notification systems.

The Blackboard Connect notification system is used to send message(s) to students, faculty and staff. Blackboard Connect allows designated University Relations or University Police personnel to send message(s) very quickly to the targeted campus or to the entire campus community via phones, e-mail, text messages and social media (i.e. Twitter). Initial emergency and timely warning community notification messages are posted on the University and University Police websites as an emergency alert or crime alert. For all issued community emergency notifications, the University will send at least one follow-up message to provide additional information to the affected community. Members of the larger community who are not affiliated with Northwestern University may visit the University website for updated emergency information. If emergency notification systems fail, the Crisis Management Team (“CMT”), will initiate emergency actions and communicate life safety guidance in conjunction with activation of building emergency action plans.
The Crisis Management Team includes the following components:

The Threat Assessment Group assesses emergency situations that impact continuity of operations of the University. The group determines the credibility of the threat and which actions will be taken to mitigate the incident. Members include representatives from:

- University Police
- Facilities Management
- Risk Management
- Research Safety
- Emergency Management
- Information Technology
- Student Health Services
- Student Affairs
- Athletics
- Human Resources
- University Relations
- School of Law
- Feinberg
- Provost Office
- Financial Operations
- Ad hoc members as needed; and

The Emergency Planning Group is the principal body responsible for addressing maintenance and management of the Emergency Response Framework (ERF). The group handles corrective actions and critical review of after-action reports, lessons learned and significant changes to the ERF. Members include representatives from:

- University Police
- Facilities Management
- Risk Management
- Research Safety
- University Relations
- Emergency Management
- Information Technology
- Student Health Services
- Student Affairs
- Center for Comparative Medicine
- Athletics
- Provost Office
- Human Resources
- Financial Operations
- NU-Q
- School of Law
- Feinberg
Emergency Notification and Warning Process
Emergency notification and warning is a capability that includes public information, alert/warning and notification. It involves developing, coordinating, and disseminating information to the public effectively under all hazard conditions. Northwestern University will, without delay and taking into account the safety of the community, assess and determine the content of the emergency notifications to be sent. The University will initiate the notification system, unless issuing a notification will, in the professional judgment of responsible authorities, compromise efforts to assist victims or contain, respond to, or otherwise mitigate the emergency. The three steps used to assess and develop emergency communications are listed below.

Step 1: Critical Incident Assessment
*Gather facts:* University Police Officers will provide situational awareness to shift supervisor who will inform the Associate Vice President & Chief of Police, Safety and Security, Assistant Vice President/Deputy Chief, Deputy Chief, and/or Police Commander. Following the initial brief a determination will be made by the Associate Vice President & Chief of Police, Safety and Security, Assistant Vice President/Deputy Chief, Deputy Chief, and/or Police Commander as to the threat level and impact to the University. If the Associate Vice President & Chief of Police, Safety and Security, Assistant Vice President/Deputy Chief, Deputy Chief and/or Police Commander confirm that there is a significant emergency or dangerous situation involving an immediate threat to the health or safety of students or employees occurring on campus, the parties involved will move to the assessment phase.

*Assess the Situation:* Once the facts have been gathered, University Police will consult with appropriate Threat Assessment Group (TAG) members to assess the nature and severity of the critical incident and the appropriate response measures. The TAG is led by the Associate Vice President & Chief of Police, Safety and Security, and comprised of key officials from operational, research and academic units. The TAG may devise response objectives to address the critical incident without invoking the Emergency Response Framework and work with University personnel involved to resolve the situation. The Associate Vice President & Chief of Police, Safety and Security, is responsible for notifying the Vice President for University Relations of the need to issue emergency communications and will keep the Vice President for University Relations apprised of new information and developments.

*Emergency Operation Center (EOC):* The EOC serves as a centralized management center for emergency operations. Here, decisions are made by the Crisis Management Team (CMT) based upon information provided by University Police and other personnel.
**Step 2: Incident/Protective Action Communications**

The Associate Vice President & Chief of Police, Safety and Security, and Vice President for University Relations, in consultation with the TAG, members of the EOC, and any other assigned University officials as needed, will determine the appropriate segment(s) of the campus community to receive notification, the content of any notification, and initiate the notification system. Guidelines for response, as needed, are as follows:

*Identify key audiences and communications strategy:* Determine which of the University’s key audiences need to be informed of the situation and in what order, how they should be informed and who is responsible for communicating to these audiences.

*Designate a spokesperson:* Assign one or two spokespersons to address key audiences to ensure a unified, consistent message is delivered at all times. Determine administrators or faculty members who are experts in the nature of the critical incident to provide commentary to the media.

*Prepare initial statement:* Tailor a standby statement to the critical incident or issue unfolding to initially provide to key audiences while the core team determines next steps.

*Ensure necessary operations are taking place:* Ensure that all applicable safety plans and measures are being implemented, if warranted, as well as necessary University functions (e.g. counseling, academic assistance, evacuation, etc.) by contacting and consulting with the EOC and/or the TAG.

*Develop key messages and prepare Q&A:* Develop key messages tailored to specific audiences to prepare for inquiries about the potential critical incident or issue. Messages should be based on confirmed and accurate facts and actions taken by the University. Make a list of anticipated questions from audiences and prepare appropriate responses.

*Inform key audiences:* Implement communications to key audiences through identified distribution channels, which could include: Northwestern website or posted alerts; direct contact via telephone or in-person; mass e-mail; media coverage (open source communication); emergency notification system (Blackboard Connect); the Outdoor Alert System and/or signage.

*Determine response to media:* If media is identified as a key audience, decide on the appropriate level of communications with media. Determine if the issue could warrant either a statement release or media briefing. If the critical incident warrants the activation of the Emergency Operations Center (operated by University Police/Emergency Services Division) it will be operated under the National Incident Management System (NIMS) principles.
Control flow of information: Key audiences and media should be given periodic updates on the situation to control the message and assist in rumor control. Alerts issued via the Emergency Notification System will include information about the emergency or threat occurring on campus and directions on what steps, if any, members of the community should take in response to the emergency. The message should include the date and time that it is issued. Alerts issued via the Outdoor Alert System will include information about the emergency or threat occurring on campus and directions on what steps, if any, members of the community should take.

Step 3: Evaluate Incident Response

Monitor Media Coverage: The Associate Vice President & Chief of Police, Safety and Security, and Vice President of University Relations, in consultation with the TAG, members of the EOC, and any other assigned University officials will monitor local media coverage to ensure accurate information is being communicated and determine if any further action is needed.

Meet and Assess: When the critical incident has passed, the TAG continues to meet to review media coverage and critical incident reports to determine the effectiveness of the response. The team notes not only the overall success or failure of the communications efforts, but also problems to be avoided in the future and any appropriate follow-up measures.

Evanston/Chicago Evacuation

For Miami campus Emergency Response and Evacuation information, see section C. below. Buildings on the Chicago and Evanston campuses have a notification system for emergency evacuation. In most buildings this is a fire alarm system. Some systems sound only an alarm while others give voice evacuation directions or announcements. Whenever the alarm system sounds and/or voice command for evacuation is sounded, everyone must leave the building or move to a safe location. It is required of all departments to have an evacuation plan, which explains the emergency systems and evacuation procedures. This document is to be readily available and provide information such as emergency telephone numbers; evacuation personnel duties; designated meeting points; and building information such as whether the building has an automatic sprinkler system, smoke detection, and/or manual alarm pull stations.

There is a designated building manager for all buildings on campus who serves as the key contact during an emergency. In high hazard buildings where several departments co-exist, there are Safety committees to ensure that all departments work together during an emergency evacuation. The Office of Risk Management provides Evacuation Warden Training to individual departments. Contact the Office of Risk Management at 847-491-5610 to set up training or

**Emergency Response and Evacuation Testing**

The Blackboard Connect system is tested quarterly, through normal use and after action evaluation. The Outdoor Alert system is tested at 10:00 am on the first Tuesday of each month. Testing of the Outdoor Alert system will be coordinated with the Evanston Police Department and Evanston Office of Emergency Preparedness. Any other testing of the system may only be authorized by the Associate Vice President & Chief of Police, Safety and Security. Designated building managers are responsible for coordinating annual evacuation drills with the Office of Risk Management. Emergency response and evacuation testing may be announced or unannounced.

The University publicizes its emergency response and evacuation procedures in conjunction with at least one test per calendar year. For each test, the University documents a description of the exercise, the date, time, and whether it was announced or unannounced. Evacuation test documentation is maintained and available from the Office of Risk Management. Blackboard Connect and the Outdoor Alert system testing information is maintained and available from the University Police Emergency Services Division.

The Northwestern University Emergency Response Framework is tested, via completion of an annual tabletop exercise, and revised each year to increase operational efficiency and maintain the highest level of preparedness, response and recovery capabilities. Federal and State legislation (Clery Act/IL-TITLE 29) requires colleges and universities to annually update, exercise, and notify the campus community as well as state legislation requiring colleges and universities to annually update plans, provide training and conduct at least one exercise each calendar year.

**C. Emergency Response and Evacuation:**

**Kellogg—Miami Campus (Alhambra Building)**

The Kellogg—Miami campus property is not owned and controlled by Northwestern University. For this reason, Northwestern University does not conduct tests of evacuation procedures on the campus. Any such tests are coordinated by the Alhambra building property management office. Northwestern University has requested that Alhambra building property management: test evacuation procedures on at least an annual basis (with tests being announced or unannounced); publicize its evacuation
procedures in conjunction with at least one test per calendar year; and maintain documentation, for each test, describing the exercise, the date, time, and whether it was announced or unannounced.

*Alhambra Building* evacuation is necessary when a fire alarm signal is sounded. Each tenant is obligated to follow approved/established Alhambra building emergency preparedness and evacuation plans. Evacuation drills are conducted, at a minimum, on an annual basis by building management. All building occupants are required to participate in the drills. Alhambra building drills are unannounced. Only the fire warden from each office is aware of the drill date and time. Alhambra building management provides all emergency preparedness procedures to Kellogg’s fire warden during annual fire warden meeting. Drill records are maintained by the Alhambra building property manager and are accessible upon request. Alhambra Building management issues the Tenant Handbook and Emergency Manual to each tenant.


Several Kellogg staff members are members of the Alhambra building emergency and evacuation team. Per the Alhambra Tenant Handbook and Emergency Manual, all members of the emergency and evacuation team must attend informational meetings and forums offered by the Fire Department, Police Department and the Alhambra Building Management office. These sessions are designed to illustrate the need for a fire action plan, demonstrate the proper use of building fire suppression equipment and familiarize everyone with the specific evacuation plan of the building.

Kellogg students and employees are encouraged to review The Alhambra Tenant Handbook and Emergency Manual and Hurricane Warning Information guide for specific information on fire safety, bomb threats, natural disasters, medical emergencies, civil disturbances, power failures and related emergency building response and evacuation procedures. For additional information, contact the Alhambra building property manager. See the Local/University Resources section for contact information (Appendix D). The Miami campus is currently exploring development of a comprehensive emergency plan in conjunction with University officials and local resources.
VIII. Campus Facilities and Building Security

A. Access to and Security of Kellogg—Miami Facility

The Alhambra lobby security station is located in the first floor lobby of the building. A security officer is stationed at 95 Merrick Way lobby during business hours. Twenty-four-hour security service is stationed at Two Alhambra Plaza and is available at any time. Any emergencies, crimes, and suspicious activity should be immediately reported to the Coral Gables Police Department and to the Alhambra Management Office at 305-447-9191 (during regular business hours, 8:30 a.m. to 5 p.m.) or the Security Dispatch Office at 305-446-2041 (after business hours).

Per The Alhambra Tenant Handbook and Emergency Manual, “security guard services are on behalf of the building owners and are for the protection of their interests in public (common) areas only” and “on-site security guards are generally powerless to assist or take police action in criminal matters in a tenant space, unless the guard personally witnesses a crime that constitutes a breach of the peace or unless a serious crime (felony) is involved.” All criminal activities should be reported immediately to the police and the building Safety/Evacuation Director so property management personnel can be ready to escort police personnel directly to the incident location.

B. Security Considerations—Campus Facility

Access to the Kellogg—Miami Campus space is limited to students participating in the program, employees, and those persons designated as guests. The main entrance doors to the Alhambra are open weekdays (excluding holidays) 7 a.m. to 6 p.m. and are closed on weekends. Access to the building is available year round, 24-hours a day. An access card is required to gain entrance to the building after hours. Card readers are located at all Kellogg—Miami entrances including the elevator and garage entrance. To gain access to the lobby or garage, simply place the card within 6 inches of the reader. Once the reader has validated your card, the door will unlock. The door will close and lock following your entry into the building. To gain access to your floor from the elevators, present your card to the reader inside the elevator and press the button to your corresponding floor. The campus also includes security cameras throughout the facility.
C. Reporting Maintenance and Safety Hazards

The Alhambra has a staff of engineers and day porters on duty during normal business hours. Per The Alhambra Tenant Handbook and Emergency Manual, all non-emergency requests for lighting and maintenance services (including building and suite security related concerns) should be made in a timely manner directly to the Kellogg—Miami Campus tenant contact who will notify the property management office. The tenant contact is identified by the Kellogg—Miami Campus administration. On weekends, after hours, and on holidays, the security dispatch office should be contacted. For contact information, see the Local/University Resources section (Appendix D).

IX. MISCELLANEOUS

A. Student Conduct

The Student Code of Conduct applies to all students. The University reserves the right to investigate and resolve reports of alleged misconduct in the following circumstances:

• Events involving students, a group of students, or a student organization affiliated with any school or department or the University as a whole (undergraduate or graduate).

• Events occurring from the time of a students’ application for admission through the actual awarding of a degree (even if the conduct is not discovered until after a degree is awarded), including, but not limited to:
  - During the academic year
  - Before classes begin or after classes end
  - During time pursuing credit away from the campus (e.g., study abroad, internships, coops)
  - During periods between terms of actual enrollment
  - While on leave from the University
  - Occurring either on or off campus

The University reserves the right to investigate and resolve any report or incident in which a student is alleged to violate any of the principles or policies published by the University or local, state, or federal laws or policies, regardless of the location where the incident occurs. Students are also expected to follow the policies and procedures of institutions that they may visit, including during international travel.
University and residence hall guests are expected to follow all University policies. Student hosts are accountable for the conduct of their guests and may be subject to disciplinary action as the responsible party for violations of University policy incurred by their guests. This applies to individuals, groups and student organizations.

All alleged violations of non-academic University policy will be resolved through the University Hearing and Appeals System overseen by the Office of Student Conduct. More information can be found on the Office of Student Conduct website. www.northwestern.edu/student-conduct/.

**B. Alcohol and Other Drug Policies/Programs**

Northwestern University fully supports federal laws that require that academic and working environments be free from illicit drug and alcohol use. For further information, consult the University’s policy statement complying with the Drug-Free Workplace Act of 1988 (copies are available from Human Resources). The University’s alcohol and drug policies are also available in the Human Resources Staff Handbook (www.northwestern.edu/hr/policies-forms/policies-procedures/staffhandbook.html); the Student Affairs Annual Policy Notification and Biennial Review web page (http://www.northwestern.edu/alcohol-resources/about-us/biennial-review/index.html); and in the booklet University Policy on Drugs and Alcohol (http://www.northwestern.edu/alcohol-resources/about-us/biennial-review/assets/nuannualnotification2016.pdf), which outlines legal sanctions for the unlawful possession, sale and use of drugs and alcohol and describes a variety of assistance programs for students and employees. The Coral Gables Police Department and other surrounding law enforcement agencies enforce all local, State and Federal drug and liquor laws, including underage drinking violations. The Northwestern University Police Department and other surrounding law enforcement agencies enforce all local, State and Federal drug and liquor laws on the Evanston and Chicago campuses, including underage drinking violations. Individuals found in violation may be issued a citation, arrested and/or (if an employee or student), referred.

**Alcohol/Drug Education**

There are no University-based drug or alcohol abuse education programs available at the Kellogg—Miami campus.

Health Promotion and Wellness offers confidential and non-judgmental screenings (in-person (Evanston) or online) that allow students to explore their alcohol and/or drug use. For more information, call Health Promotion and Wellness at 847-491-2146 or visit http://www.northwestern.edu/hpaw/services/aod/index.html.
Counseling Assistance
Students are encouraged to contact Northwestern University Counseling and Psychological Services (CAPS) to discuss any issues related to alcohol/drug usage or for other support services that CAPS offers. Students who would like more information should contact CAPS at 847-491-2151 or visit their website at www.northwestern.edu/counseling. University employees can access professional counseling support and services through a faculty and staff assistance program. For additional information, visit www.northwestern.edu/hr/work-life/faculty-staff-assistance-program.html.

Local and University Resources
For information on Local and University resources, see Appendix D.

C. Disciplinary Hearings

As applicable, University community members are held accountable for their actions through state law, city ordinance and the University’s student disciplinary processes, including the University Hearing and Appeals System (UHAS).

Northwestern University will, upon written request, disclose to the alleged victim of a crime of violence or a non-forcible sex offense, the results of any disciplinary proceeding conducted by the institution against a student who is the alleged perpetrator of such crime or offense. If the alleged victim is deceased as a result of such crime or offense, the next of kin of such victim shall be treated as the alleged victim for purposes of this paragraph.

D. Employee Safety Handbook

The University Emergency Response Framework calls upon all employees to be familiar with the Employee Safety Handbook. For additional information on University emergency procedures and safety resources, consult the Handbook at http://www.northwestern.edu/risk/docs/safety-procedures/safety-handbook.pdf. For information on safety and emergency procedures for the following: exposure to radiation, chemical, and biological laboratory incidents, hazardous chemicals, and exposure to human blood, or other potentially infectious human materials, visit the Office for Research Safety (ORS) website at www.research.northwestern.edu/ORS.
E. EthicsPoint Reporting

Northwestern has selected EthicsPoint, Inc. to provide community members with a confidential means for reporting activities that may involve misconduct or violations of University policy. You may report your concerns by dialing 866-294-3545 and speaking with an EthicsPoint representative or by completing an online report at the following website: https://secure.ethicspoint.com/domain/media/en/gui/7325/index.html. With either method of reporting, you may choose to remain anonymous. You will receive a report key and password that will allow you to continue to communicate with Northwestern’s response team without revealing your identity. EthicsPoint is not a substitute for, nor does it supersede, any existing reporting methods or protocols already in place at Northwestern for reporting suspected problems or complaints. Instead, EthicsPoint provides an additional means of reporting such issues. Any suspected problems or complaints reported via EthicsPoint will be reviewed in accordance with current University procedures, including those described in the Faculty, Staff, or Student Handbooks. Northwestern University prohibits retaliation against any individual who reports or inquires about potential breaches of University policy or local, state, or federal law.
APPENDIX A

KELLOGG—MIAMI CAMPUS TRAININGS
(Specifically Focused on Sexual Assault, Domestic Violence, Dating Violence and Stalking)
Northwestern is committed to providing a campus environment that is free from sexual misconduct and discrimination and where people understand their responsibilities to help prevent sexual misconduct, including sexual assault, sexual harassment, sexual exploitation, stalking, and dating and domestic violence.

As we are all responsible for the safety of our community, the University provides faculty, staff, graduate students, and professional students with valuable education and resources through an online course, *Preventing Sexual Misconduct and Sex Discrimination*. This interactive course educates participants about sexual misconduct, the associated laws and University policies, and available resources at Northwestern. Topics such as sex discrimination, sexual assault, sexual harassment, dating and domestic violence, and stalking are covered. Undergraduate students receive in-person training and complete a student-focused online training module when they enter the University.

The Northwestern University main campus (Evanston) is available to provide Northwestern’s remote campuses with information on training initiatives, programs and campaigns developed in accordance with the Violence Against Women Act. For additional information, contact the Sexual Harassment Prevention Office at 847-467-6165 or TitleIXCoordinator@northwestern.edu.

On average, the Kellogg Miami campus supports 170 students and has no on site faculty (all faculty are based on the Evanston campus) and 12 support staff which includes 1 contractor. Establishing and evaluating VAWA training initiatives, programs and campaigns will be an ongoing process on the Kellogg Miami campus.
### VAWA training Miami campus—2015 Calendar Year

<table>
<thead>
<tr>
<th>NAME OF CAMPAIGN/ PROGRAM</th>
<th>AUDIENCE (students, faculty, staff or any combination of above)</th>
<th>ATTENDANCE</th>
<th>WHEN OFFERED (date or time frame)</th>
<th>REQUIRED</th>
<th>BRIEF DESCRIPTION</th>
</tr>
</thead>
<tbody>
<tr>
<td>Personal Safety Training</td>
<td>Staff</td>
<td>8</td>
<td>8/18/15</td>
<td>NO</td>
<td>Held by Coral Gables Police Public Information Officer, Kelly Denham. Officer Denham provided an information session on campus about personal safety covering topics such as walking to and from campus at night, how to be aware and respond to suspicious individuals on campus, and tips on self-defense when a dangerous situation arises.</td>
</tr>
<tr>
<td>Discrimination, Harassment and VAWA training</td>
<td>Staff</td>
<td>10</td>
<td>8/30/2015</td>
<td>Yes</td>
<td>Overview of harassment and discrimination examples and polices. Overview of VAWA.</td>
</tr>
<tr>
<td>Discrimination, Harassment and VAWA training</td>
<td>Students</td>
<td>52</td>
<td>8/30/2015</td>
<td>Yes</td>
<td>Overview of harassment and discrimination examples and polices. Overview of VAWA.</td>
</tr>
<tr>
<td>Pamphlets</td>
<td>Staff</td>
<td>10</td>
<td>August</td>
<td>Yes</td>
<td>Topical pamphlets distributed to all new students and staff during respective orientation.</td>
</tr>
<tr>
<td>Pamphlets</td>
<td>Students</td>
<td>52</td>
<td>August</td>
<td>Yes</td>
<td>Topical pamphlets distributed to all new students and staff during respective orientation.</td>
</tr>
<tr>
<td>EMBA Course Catalog</td>
<td>Students</td>
<td>52</td>
<td>On-going</td>
<td>Yes</td>
<td>Course catalog includes Student Code of Conduct which outlines prohibited activity including discrimination, harassment, etc.</td>
</tr>
<tr>
<td>Discrimination, Harassment and VAWA training</td>
<td>Students</td>
<td>40</td>
<td>January 2015</td>
<td>Yes</td>
<td>Overview of harassment and discrimination examples and polices. Overview of VAWA.</td>
</tr>
<tr>
<td>Posters</td>
<td>All students, staff, and faculty</td>
<td>185</td>
<td>On-going</td>
<td>Yes</td>
<td>Posters with information about sexual harassment and discrimination policies posted in high traffic areas.</td>
</tr>
</tbody>
</table>
APPENDIX B

CLERY ACT CRIMES AND GEOGRAPHY
(Definitions)
The crime data tables (Appendix E) reflect the mandatory reporting offenses as specified in the Clery Act. The tables display crime data over the past three calendar years and are separated by Act defined geography (see Clery Geography section below). The data reported on liquor laws, drug laws and weapons offenses represent the number of people arrested or referred to campus judicial authorities for respective violations, not the number of offenses documented.

**CRIMES (Section 1)**

**Murder and Non-Negligent Manslaughter:** The willful (non-negligent) killing of a human being by another. Note: Deaths caused by negligence, attempts to kill, assaults to kill, suicides, accidental deaths, and justifiable homicides are excluded.

**Manslaughter by Negligence:** The killing of another person through gross negligence. Gross negligence is the intentional failure to perform a manifest duty in reckless disregard of the consequences as affecting the life or property of another.

**Robbery:** The taking or attempting to take anything of value from the care, custody, or control of a person by force or threat of force or violence and/or by putting the victim in fear. The taking of personal property in the possession of another, from his/her immediate presence, and against his/her will, accomplished by means of force or fear (includes attempts).

**Aggravated Assault:** An unlawful attack by one person upon another for the purpose of inflicting severe or aggravated bodily injury. This type of assault usually is accompanied by the use of a weapon or by means likely to produce death or great bodily harm. It is not necessary that injury result from an aggravated assault when a gun, knife or other weapon is used which could or probably would result in a serious potential injury if the crime were successfully completed. An unlawful assault upon the person of another for the purpose of inflicting severe or aggravated bodily injury (includes attempts, and whether or not an injury occurred).

**Burglary:** The unlawful entry of a structure to commit a felony or a theft. For reporting purposes this definition includes: unlawful entry with intent to commit a larceny or a felony; breaking and entering with intent to commit a larceny; housebreaking; safecracking; and all attempts to commit any of the aforementioned.

**Motor Vehicle Theft:** The theft or attempted theft of a motor vehicle. (Classify as motor vehicle theft all cases where automobiles are taken by persons not having lawful access, even though the vehicles are later abandoned - including joy riding.)
**Arson:** Any willful or malicious burning or attempt to burn, with or without intent to defraud, a dwelling, house, public building, motor vehicle or aircraft, personal property of another, etc.

**Sexual Assault**

a. *Sexual Penetration without Consent (e.g., rape):* Any penetration of the sex organs, anus, or mouth of another person when consent is not present.

This includes penetration or intrusion, however slight, by an object or any part of the body, specifically including cunnilingus, fellatio, vaginal intercourse and anal intercourse.

b. *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, fondle or contact oneself or someone else.

c. *Incest:* Sexual intercourse between persons who are related to each other within the degrees wherein marriage is prohibited by the laws of the state\(^1\) in which the incident occurred.

d. *Statutory Rape:* Sexual intercourse with a person who is under the statutory age of consent under the laws of the state\(^2\) in which the incident occurred.

**Dating Violence:** The term “dating violence” means violence committed by a person:

a. Who is or has been in a social relationship of a romantic or intimate nature with the victim; and

b. Where the existence of such a relationship shall be determined based on a consideration of the following factors:

(i) The length of the relationship.
(ii) The type of relationship.
(iii) The frequency of interaction between the persons involved in the relationship.

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

\(^2\) For incidents that occur outside of the United States (e.g., study abroad programs), Illinois law will apply in determining a violation of this policy.
**Domestic Violence**: A felony or misdemeanor crime of violence committed by:

1. A current or former spouse or intimate partner of the victim.
2. By a person with whom the victim shares a child in common.
3. By a person who is cohabitating with or has cohabitated with the victim as a spouse or intimate partner.
4. By a person similarly situated to a spouse or the victim under the domestic or family violence laws of the jurisdiction in which the crime of violence occurred.
5. By any other person against an adult or youth victim who is protected from that person’s acts under the domestic or family violence laws or the jurisdiction in which the crime of violence occurred.

**Stalking**: Engaging in a course of conduct directed at a specific person that would cause a reasonable person to:

1. Fear for his or her safety or the safety of others; or
2. Suffer substantial emotional distress.

**CLERY ACT REPORTABLE ARRESTS AND REFERRALS (Section 2)**

**Drug/Narcotic Violations**: Violations of state and local laws relating to the unlawful possession, sale, use, growing, manufacturing, and making of narcotic drugs. The relevant substances include: opium or cocaine and their derivatives (morphine, heroin, codeine); marijuana; synthetic narcotics (Demerol, methadones); and dangerous non-narcotic drugs (barbiturates, Benzedrine). Drug/narcotic violations referred for campus disciplinary action under the Campus Code need not be reported to the Police Department.

**Alcohol Violations**: Violation of state or local laws or ordinances prohibiting the manufacture, sale, purchase, transportation, possession or use of alcoholic beverages, not including driving under the influence and drunkenness.

**Weapons Violation**: Violation of laws or ordinances prohibiting the manufacture, sale, purchase, transportation, possession, concealment, or use of firearms, cutting instruments, explosives, incendiary devices or other deadly weapons. This classification encompasses weapons offenses that are regulatory in nature.
CLERY ACT REPORTABLE HATE CRIMES (Section 3)

Hate Crimes: A crime involving one or more of the above listed crimes (in Section 1), the crimes of theft, simple assault, intimidation and/or vandalism (see below) reported to local police agencies or to a campus security authority that manifests evidence that the victim was intentionally selected because of the perpetrator’s bias against the victim. The categories of bias include the victim’s actual or perceived race, religion, gender, gender identity, sexual orientation, ethnicity, national origin and disability.

- **Larceny-Theft: (Except Motor Vehicle Theft):** The unlawful taking, carrying, leading or riding away of property from the possession or constructive possession of another. Attempted larcenies are included. Embezzlement, confidence games, forgery, worthless checks, etc. are excluded.

- **Simple Assault:** An unlawful physical attack by one person upon another where neither the offender displays a weapon, nor the victim suffers obvious severe or aggravated bodily injury involving apparent broken bones, loss of teeth, possible internal injury, severe laceration or loss of consciousness.

- **Intimidation:** To unlawfully place another person in reasonable fear of bodily harm through the use of threatening words and/or other conduct, but without displaying a weapon or subjecting the victim to actual physical attack.

- **Destruction/Damage/Vandalism of Property:** To willfully or maliciously destroy, damage, deface, or otherwise injure real or personal property without the consent of the owner or the person having custody or control of it.
Clery Geography

Under the Clery Act, reported crimes must have occurred on, or within, what is referred to as the institution’s “Clery geography.” This includes property located in the following areas:

On-Campus: Any building or property owned or controlled by an institution within the same reasonably contiguous geographical area and used by Northwestern in direct support of, or in a manner related to, institutional educational purposes, including residence halls; and any building or property that is within or reasonably contiguous to the geographical area mentioned above in this definition, that is owned by Northwestern but controlled by another person, is frequently used by students, and supports institutional purposes (such as a food or other retail vendor).

Non-Campus: Any building or property owned or controlled by a student organization that is officially recognized by the institution; or any building or property owned or controlled by an institution that is being used in direct support of, or in relation to, the institution’s educational purposes, is frequented by students and is not within the same reasonably contiguous geographic area of the institution.

Public Property: All public property, including thoroughfares, streets, sidewalks, and parking facilities, that is within the campus, or immediately adjacent to and accessible from the campus.
APPENDIX C

SUPPLEMENTAL KELLOGG—MIAMI CAMPUS SEXUAL MISCONDUCT POLICY CONTENT
Crime Definitions Under Florida Law
Because some of the offenses in the Sexual Misconduct Policy are also crimes under State law, the University provides this summary of relevant Florida terms and definitions as a resource. Community members who are involved in legal action related to a sexual crime or offense under Florida law should consider speaking with an attorney for specific information about relevant State law and legal advice. Because local laws are always changing, for the full definition of these terms, related definitions, and associated criminal penalties, please see the precise statutory provision listed.

Consent (Florida State Statute (F.S.S.) 794.011(1)(a) is defined as intelligent, knowing, and voluntary consent and does not include coerced submission. “Consent” shall not be deemed or construed to mean the failure by the alleged victim to offer physical resistance to the offender.

Domestic Violence (F.S.S. 741.28) means any assault, aggravated assault, battery, aggravated battery, sexual assault, sexual battery, stalking, aggravated stalking, kidnapping, false imprisonment, or any criminal offense resulting in physical injury or death of one family or household member by another family or household member. A family or household members are spouses, former spouses, persons related by blood or marriage, persons who are presently residing together as if a family or who have resided together in the past as if a family, and persons who are parents of a child in common regardless of whether they have been married. With the exception of persons who have a child in common, the family or household members must be currently residing together or have in the past resided together in the same single dwelling unit. Domestic Violence includes
a. Physical Abuse: Pushing, slapping, kicking, choking, and beating,
b. Emotional/Verbal Abuse: verbal intimidation, credible threats, following and stalking, acting out in anger, and

Dating Violence (F.S.S. 784.046) is violence between individuals who have or have had a continuing and significant relationship of a romantic or intimate nature. The existence of such a relationship shall be determined based on the consideration of the following factors
a. A dating relationship must have existed within the past 6 months,
b. The nature of the relationship must have been characterized by the expectation of affection or sexual involvement between the parties,
c. The frequency and type of interaction between the persons involved in the relationship must have included that the persons have been involved over time and on a continuous basis during the course of the relationship, and
d. The term does not include violence in a casual acquaintance or violence between individuals who only have engaged in ordinary fraternization in a business or social context.

Sexual Violence (F.S.S. 784.046) is one incident of
a. Sexual Battery as defined in F.S.S. 794.011 Sexual battery.
b. (1) As used in this chapter:
c. (a) “Consent” means intelligent, knowing, and voluntary consent and does not include coerced submission. “Consent” shall not be deemed or construed to mean the failure by the alleged victim to offer physical resistance to the offender.
d. (b) “Mentally defective” means a mental disease or defect which renders a person temporarily or permanently incapable of appraising the nature of his or her conduct.
e. (c) “Mentally incapacitated” means temporarily incapable of appraising or
controlling a person’s own conduct due to the influence of a narcotic, anesthetic, or intoxicating substance administered without his or her consent or due to any other act committed upon that person without his or her consent.

f. (d) “Offender” means a person accused of a sexual offense in violation of a provision of this chapter.

g. (e) “Physically helpless” means unconscious, asleep, or for any other reason physically unable to communicate unwillingness to an act.

h. (f) “Retaliation” includes, but is not limited to, threats of future physical punishment, kidnapping, false imprisonment or forcible confinement, or extortion.

i. (g) “Serious personal injury” means great bodily harm or pain, permanent disability, or permanent disfigurement.

j. (h) “Sexual battery” means oral, anal, or vaginal penetration by, or union with, the sexual organ of another or the anal or vaginal penetration of another by any other object; however, sexual battery does not include an act done for a bona fide medical purpose.

k. (i) “Victim” means a person who has been the object of a sexual offense.

l. (j) “Physically incapacitated” means bodily impaired or handicapped and substantially limited in ability to resist or flee.

m. A Lewd or Lascivious Act as defined in chapter 800, Florida State Statutes (F.S.S.) committed upon or in the presence of a person younger than 16 years of age,

n. Luring or enticing a child, as described in chapter 787 F.S.S., or

o. Sexual Performance by a Child as described in chapter 827 F.S.S.

**Stalking** – (F.S.S. 784.048) occurs when a person willfully, maliciously, and repeatedly follows, harass, or cyberstalks another person. Aggravated stalking occurs when that person makes a credible threat to that person through stalking.
### Off-Campus Miami Area Resources

<table>
<thead>
<tr>
<th>PROGRAM OR ORGANIZATION</th>
<th>CONTACT INFORMATION OR LOCATION</th>
<th>SERVICE OFFERED</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Hotlines</strong> (not staffed by or affiliated with Northwestern)</td>
<td>RAINN: Rape, Abuse, and Incest National Network 800-656-HOPE <a href="https://ohl.rainn.org/online">https://ohl.rainn.org/online</a> (online hotline) Miami-Dade County Domestic Violence Hotline 800-500-1119 National Domestic Violence Hotline 800-799-7233</td>
<td>All hotlines provide 24 hour (7 days/week) confidential services.</td>
</tr>
<tr>
<td>Coral Gables Police Department</td>
<td>2801 Salzedo Street Coral Gables, Florida 33134 305-446-1600</td>
<td>Provides law enforcement in addition to Victim Advocacy services.</td>
</tr>
<tr>
<td>The Florida Bar – Miami Branch</td>
<td>Suite M100, Rivergate Plaza 444 Brickell Avenue Miami, Florida 33131-2404 305-377-4445</td>
<td>Legal assistance.</td>
</tr>
<tr>
<td>Roxcy Bolton Rape Treatment Center</td>
<td>1611 NW 12th Ave, Miami, Florida 33136 305-585-5185</td>
<td>The center provides comprehensive quality medical treatment and crisis counseling by a team of doctors, nurses, and therapists all sensitively trained to work with rape victims. All services are at no cost and are completely confidential regardless of police involvement.</td>
</tr>
<tr>
<td>Jackson Memorial Hospital—Miami</td>
<td>1611 NW 12th Avenue Miami, Florida 33136 305-585-1111</td>
<td>Medical services. Also provides for physical evidence recovery/collection and access to forensic services.</td>
</tr>
</tbody>
</table>
Law Enforcement Contact Information

Coral Gables Police Department
2801 Salzedo Street
Coral Gables, Florida 33134
305-442-1600

City of Miami Police Department
400 NW 2nd Avenue
Miami, Florida 33128
305-579-6111
www.miami-police.org/index.asp

South Miami Police Department
6130 Sunset Drive South
Miami, Florida 33143
305-663-6301

Miami-Dade Police Department
9105 NW 25 Street
Doral, Florida 33172
305-476-5423
www.miamidade.gov/police

Victim Rights
For information on and to access a complete list of Victim’s Rights in the State of Florida, call 800-226-6667 or visit the Florida Office of the Attorney General at http://myfloridalegal.com/pages.nsf/main/5902c323b86a1dff85256c-c5007ae59b!OpenDocument.
APPENDIX D

LOCAL AND UNIVERSITY RESOURCES
Local

Police, Fire and All Emergencies 911

Coral Gables Police Department
Non-emergency 305-442-1600
2801 Salzedo Street,
Coral Gables, Florida 33134


The Alhambra Building Management Office 305-447-9191

The Alhambra After-Hours
Building Emergency Number/Security Dispatch 305-446-2041

American Red Cross 305-644-1200

University

Kellogg – Miami Campus 305-442-7780
Director of Campus (Melissa Holland) 305-445-1381

Health Promotion and Wellness 847-491-2146
(Sexual Assault Education & Violence Prevention)

CARE (Center for Awareness, Response and Education) 847-491-2054

Health Service 24 hour emergency line 847-491-8100

Counseling and Psychological Services (CAPS) 847-491-2151
24 hour emergency line (call & follow prompts) 847-491-2151

Northwestern University Police 847-491-3456
1201 Davis Street, Evanston, IL 60208
universitypolice@northwestern.edu 847-467-7883 (TDD)

Northwestern University Women’s Center 847-491-7360

University Dean of Students Office 847-491-8430

Office of Student Conduct 847-491-4582

Sexual Harassment Prevention Office 847-491-3745

Faculty and Staff Assistance Program 855-547-1851
APPENDIX E

CRIME DATA FOR KELLOGG—MIAMI CAMPUS
## Crime Data For Miami Campus

<table>
<thead>
<tr>
<th>Offense</th>
<th>Year</th>
<th>Crime Occurrence Locations</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>On Campus</td>
</tr>
<tr>
<td>Murder and Non Negligent Manslaughter</td>
<td>2015</td>
<td>0</td>
</tr>
<tr>
<td></td>
<td>2014</td>
<td>0</td>
</tr>
<tr>
<td></td>
<td>2013</td>
<td>0</td>
</tr>
<tr>
<td>Manslaughter by Negligence</td>
<td>2015</td>
<td>0</td>
</tr>
<tr>
<td></td>
<td>2014</td>
<td>0</td>
</tr>
<tr>
<td></td>
<td>2013</td>
<td>0</td>
</tr>
<tr>
<td>Rape*</td>
<td>2015</td>
<td>0</td>
</tr>
<tr>
<td></td>
<td>2014</td>
<td>0</td>
</tr>
<tr>
<td>Fondling*</td>
<td>2015</td>
<td>0</td>
</tr>
<tr>
<td></td>
<td>2014</td>
<td>0</td>
</tr>
<tr>
<td>Incest*</td>
<td>2015</td>
<td>0</td>
</tr>
<tr>
<td></td>
<td>2014</td>
<td>0</td>
</tr>
<tr>
<td>Statutory Rape*</td>
<td>2015</td>
<td>0</td>
</tr>
<tr>
<td></td>
<td>2014</td>
<td>0</td>
</tr>
<tr>
<td>Sex Offenses (forcible)*</td>
<td>2013</td>
<td>0</td>
</tr>
<tr>
<td>(Rape, Sodomy, Sexual Assault with object, and Fondling)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Sex Offenses (non-forcible)*</td>
<td>2013</td>
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</tr>
<tr>
<td>(Incest and Statutory Rape)</td>
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<td></td>
</tr>
<tr>
<td>Robbery</td>
<td>2015</td>
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</tr>
<tr>
<td></td>
<td>2014</td>
<td>0</td>
</tr>
<tr>
<td></td>
<td>2013</td>
<td>0</td>
</tr>
<tr>
<td>Aggravated Assault</td>
<td>2015</td>
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</tr>
<tr>
<td></td>
<td>2014</td>
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<tr>
<td></td>
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<td>Burglary</td>
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<td></td>
<td>2013</td>
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<tr>
<td>Motor Vehicle Theft</td>
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<tr>
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<td>0</td>
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<tr>
<td>Liquor Law Arrests</td>
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</tr>
<tr>
<td></td>
<td>2014</td>
<td>0</td>
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<td>2013</td>
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<tr>
<td>Drug Law Arrests</td>
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<td>2014</td>
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</tr>
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<td>2013</td>
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</table>
**Crime Data For Miami Campus**

<table>
<thead>
<tr>
<th>Offense (Reported By Hierarchy)</th>
<th>Year</th>
<th>Crime Occurrence Locations</th>
<th>On Campus</th>
<th>Non-Campus</th>
<th>Public Property</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Weapon Law Arrests</td>
<td>2015</td>
<td></td>
<td>0</td>
<td>0</td>
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<tr>
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<tr>
<td></td>
<td>2013</td>
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<tr>
<td>Liquor Law Violations Referred for Disciplinary Action</td>
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<td>0</td>
</tr>
<tr>
<td></td>
<td>2014</td>
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<tr>
<td></td>
<td>2013</td>
<td></td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Drug Law Violations Referred for Disciplinary Action</td>
<td>2015</td>
<td></td>
<td>0</td>
<td>0</td>
<td>0</td>
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<tr>
<td></td>
<td>2013</td>
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<td>0</td>
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<tr>
<td>Weapons Law Violations Referred for Disciplinary Action</td>
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<tr>
<td></td>
<td>2013</td>
<td></td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
</tbody>
</table>

1. Hierarchy Rule for Multiple Offenses: When counting multiple Clery Act reportable offenses, the FBI’s UCR Hierarchy Rule is applied. This rule requires that only the most serious offense be counted when more than one offense was committed during a single incident. The hierarchy rule does not apply to incidents involving Arson, Domestic Violence, Dating Violence, Stalking, and any incidents involving Hate Crimes. These crimes are always counted in addition to, and regardless of the nature of, any other Clery reportable offenses that were committed during the same incident.

2. The list of Clery Crimes was amended by US Department of Education regulations, effective July 1, 2015. These regulations generally recategorized listed sex offenses. New categories are identified with an “*”. For reporting years prior to 2015, sex offense, instead of “sexual assault,” included: (1) forcible sex offenses: (a) rape, (b) forcible sodomy, (c) sexual assault with an object, and (d) forcible fondling; and (2) non-forcible sex offenses: (a) incest; (b) statutory rape.

3. October 20, 2014, the US Department of Education published the final regulations for the Violence Against Women Act amendments to the Clery Act to include additional reporting categories.

**Bias Type for Crimes Manifesting Prejudice**

Northwestern University is responsible for reporting Clery Act defined Hate Crimes by category of prejudice, geographic location, the year an incident is reported in, and the category of crime (including any crime perpetrated on the basis of prejudice that results in bodily injury). For the 2013, 2014, and 2015 reporting years, Northwestern University has received no reports of any Clery Act recognized Hate Crime.

**Unfounded Crime**

On October 20, 2014, the US Department of Education published the final regulations for the Violence Against Women Act amendments which require reporting of “Unfounded” crimes starting with the 2014 calendar year. Unfounded reports are not recorded in the total crime numbers, though they are also listed under a category as “Unfounded.” Reports are only declared “Unfounded” where sworn or commissioned law enforcement personnel have fully investigated the reported crime and have made a determination that the crime report is false or baseless and therefore “unfounded.” For the 2014 and 2015 reporting years, Northwestern University is not aware of any Unfounded reports.