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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 http://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. Other than the noted residential location, Northwestern University does not own or lease any student residences and there are no 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 Act Crimes and Reportable Locations (Definitions)
VI. Sexual Misconduct
VII. Timely Warnings, Emergency Notifications, 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 Reportable Locations (Definitions)
C. Supplemental Kellogg – Miami Campus Sexual Misconduct Policy Content
D. Local / University Resources
E. Crime Data: 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 e-mail of the availability of the Report, and posted web address, http://www.northwestern.edu/up/safety/annual-report/index.html.

Paper copies of this Report are available from University Police upon request. To request a paper copy, please contact University Police at universitypolice@northwestern.edu or by calling (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. On the Evanston and Chicago campuses, the Northwestern University Police Department (University Police) 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 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 University Police.

A. University Police Authority

University Police Officers 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 Officers 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 has 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 Department, 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

Northwestern University Police 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 has requested the Coral Gables Police Department to provide timely notification of situations on or
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 [http://www.northwestern.edu/up/about/contact/department-directory.html](http://www.northwestern.edu/up/about/contact/department-directory.html) and in various University and University Police web sites and in publications 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 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. In response to a call regarding a reported crime, Evanston and Chicago campus University Police Officers are dispatched to make contact with the reporting party and take a police report. University Police 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

University Police 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 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) / agency(s).
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 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 http://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 http://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.

- Lock your office or study area whenever 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: http://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: http://www.northwestern.edu/care, and University Police at: http://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 / telephone, (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. And 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 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 below, 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 names and contact information, if known, or identifying information of the alleged offender(s) and witnesses.

C. Anonymous Reporting

Victims and witnesses may report crimes on an anonymous basis to CSAs so those crimes can be included in the University Police’s Evanston or Chicago campus Crime Log (the Blotter) and the University’s annual statistical report of crimes occurring on and around campus. With such data, the University can maintain accurate records of the number of incidents and 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 a detailed description and occurrence date (time frame) and location of the crime, without identifying the alleged victim, witnesses or perpetrator, to University Police. 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 and in Appendices A and C.

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. Negligent manslaughter
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

\(^1\) The list of Clery Crimes was amended by U.S. Department of Education regulations, effective July 1, 2015. Those regulations generally re-categorized 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
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
12. Hate crimes associated with any of the crimes listed in points 1 – 10, any crime involving bodily injury or associated with a larceny-theft, simple assault, intimidation or destruction / damage/vandalism of property.

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 property owned or controlled by an institution within the same reasonably contiguous geographical area and used by the institution 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 paragraph (1) of this definition, that is owned by Northwestern University 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. The Clery Act does not require disclosure of crime statistics for public property that surrounds non-campus buildings or property.

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.

At Northwestern, CSAs are directed to register as a CSA through an online portal. A list of CSAs is maintained by the University Clery Coordinator. The University offers CSA training that covers, among other things: the duties and responsibilities of CSAs, how to report crime to which they become aware, 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 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. The Kellogg – Miami campus does not have a Northwestern University Police or security presence on campus so there is no Clery requirement to maintain a Crime Log. However, Evanston and Chicago campus crimes reported to University Police and by CSAs through the online CSA crime reporting form, available at http://www.northwestern.edu/up/safety/crime-report-form.html, are also reported on the Evanston and Chicago campus Crime Log (“the Blotter”) which is updated daily Monday through Friday and is available at, http://www.northwestern.edu/up/safety/blotter/index.html. The Blotter contains reported criminal and non-criminal incidents. The Blotter is also available for review at a kiosk located in the lobby of the Chicago and Evanston University Police stations and also at the Evanston campus Parking Office. The information in the Blotter typically includes the nature, date, time, general location, and disposition of each incident. In addition, Monday through Friday, a summary of criminal incidents reported during the previous weekday is distributed to senior University administrators and the Daily Northwestern newspaper.

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 Section I.

Monthly, University Police publishes and distributes the RAP Sheet. The RAP Sheet provides information on specific crime prevention topics, crime statistics and highlights Department and related University programming. Visit http://www.northwestern.edu/up/crime/rap-sheet-newsletter.html to subscribe.

Statistical data available from these sources is compiled 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 the ASR, 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. On September 10, 2015, that policy was updated, in part to respond to recent changes in relevant law and regulations. The policy is available online at, http://www.northwestern.edu/provost/policies/title-ix/sexual_misconduct_policy.pdf and is included below. At the time of this publication, the University is developing a supplement to the updated policy specifically for the Miami campus, which will be posted online once it is available. In the meantime, please refer to Appendix C, which includes additional relevant information for the Miami campus.

In addition, 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.
POLICY ON SEXUAL MISCONDUCT

Policy Statement

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

Reason for Policy/Purpose

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

Who Approved This Policy

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

Who Needs to Know This Policy

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

Jurisdictional Statement

Northwestern University has jurisdiction to 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 where one or more of the parties are not members of the University community, the University’s ability to investigate and/or impose disciplinary sanctions may be limited. In such instances, the University reserves the right to take any steps it deems appropriate to 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:

1. Title IX Coordinator and Director of the Office of Sexual Harassment Prevention: (847) 491-3745 or sexual-harassment@northwestern.edu

2. Dean of Students: (847) 491-8430 or dos@northwestern.edu

3. Deputy Title IX Coordinator for sexual misconduct complaints against students: (847) 467-5078 or student-conduct@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 immediately following this policy statement, 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 conduct.

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.

- 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 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 (undue pressure) 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. 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, or any penetration of the mouth of another person with a sex organ 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, specifically including cunnilingus, fellatio, vaginal intercourse, and anal intercourse.

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 state 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 state in which the incident occurred.

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

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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.
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:

- Physical abuse: hitting, slapping, shoving, grabbing, pinching, biting, or hair pulling.
- Sexual abuse: marital rape, 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.
- 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.

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

- Breast-feeding a child is not indecent.
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. The University’s Policy on Sexual Harassment has been restated here, but is also available separately at http://www.northwestern.edu/sexual-harassment/university-policies/sexual-harassment-policy/index.html.

### 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 to the Title IX Coordinator or Deputy Title IX Coordinator, unless they have a recognized confidentiality privilege. For information regarding employees with confidentiality privileges, see Procedures Section 3.

### IV. Retaliation

Northwestern University strictly prohibits any material adverse action against any individual for reporting, providing information, exercising one’s rights or responsibilities under this policy, or otherwise being involved in the process of responding to, investigating, or addressing allegations of sexual misconduct. Therefore, retaliatory actions such as intimidation, threats, or coercion against any such individual for having engaged in the above activities will be addressed in the most serious way by Northwestern. Individuals who engage in such actions 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. Anyone who is aware of possible retaliation or has other concerns regarding the response to a complaint of sexual misconduct should report such concerns to the Title IX Coordinator or to a Deputy Title IX Coordinator, who shall investigate the matter and make findings so the University can take appropriate actions to address such conduct in a fair and impartial manner.

### V. Amnesty for Sexual Misconduct Complainants and Witnesses

Northwestern University encourages reporting of sexual misconduct and seeks to remove any barriers to an individual/group 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. An individual(s) who reports sexual misconduct that was directed at them or another person, either as a Complainant or a third party witness, will not be subject to disciplinary action by the University for their own personal consumption of alcohol or drugs at or near the time of the incident, provided that any such violations did not and do not place the health or safety of any other person 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 will not be extended for any violations of University policy other than alcohol/drug use. In addition, amnesty does not preclude or prevent action by police or other legal authorities.

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 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. Title IX also prohibits retaliation for asserting or otherwise participating in claims of sex discrimination. Northwestern has designated the Title IX Coordinator, with assistance of the Deputy Title IX Coordinators, to coordinate Northwestern’s compliance with Title IX and to respond to reports of violations. For more information about Title IX, 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.

VIII. The Violence Against Women Act (VAWA) Statement

It is the policy of Northwestern University 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 which became effective on July 1, 2015 (collectively referred to as VAWA). 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 directed its Title IX Coordinator, with assistance of the Deputy Title IX Coordinators, to coordinate Northwestern’s compliance with VAWA and to respond to reports of violations, and its Clery Coordinator to coordinate Northwestern’s compliance with the Clery reporting-related VAWA requirements.

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. Interim Protective Measures & Accommodations
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 test for and treat sexually transmitted infections, test for 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](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](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](http://www.northshore.org/locations/our-hospitals/evanston-hospital) (for more information or to request an appointment online)

**Northwestern Memorial Hospital, Emergency Department (24 hours)**
Evidence collection kit available; Advocate from Rape Victim Advocates will be present to provide support services, if desired.
Location: 251 E Erie Street, Chicago
Phone: (312) 926-5188 (emergency room)
Website: [http://www.nmh.org/nm/quality-emergency-department-services](http://www.nmh.org/nm/quality-emergency-department-services) (for more information)

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:**

- Do not alter, dispose of, or destroy any physical evidence.

- If there is suspicion that a drink may have been drugged, 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).

- 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 should nevertheless 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 should not shower, bathe, douche, smoke, brush teeth, eat, drink, 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, they should not wash the clothes worn or bedding used during the assault, and should bring them to a hospital, medical facility or the police in a non-plastic bag (e.g., paper bag).

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

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.

<table>
<thead>
<tr>
<th>On-Campus Confidential Resources:</th>
<th>CARE: Center for Awareness, Response &amp; Education</th>
<th>Evanston Campus: 633 Emerson Street, 3rd Floor (847) 491-2054 <a href="mailto:care@northwestern.edu">care@northwestern.edu</a> <a href="http://www.northwestern.edu/care">www.northwestern.edu/care</a></th>
<th>(Central location for students, survivors, or friends of survivors to seek survivor-centered, trauma-informed support services and advocacy regarding sexual misconduct) Advocacy Services include (but are not limited to): help obtaining academic, housing, or other accommodations from the University; counseling referrals; information about sexual health concerns; information about reporting options; referrals for medical and/or legal advocacy</th>
</tr>
</thead>
<tbody>
<tr>
<td>On-Campus Confidential Resources:</td>
<td>Women's Center Counseling Services</td>
<td>Evanston Campus: 2000 Sheridan Road (847) 491-7360</td>
<td>Provides counseling services for faculty, students and staff members</td>
</tr>
<tr>
<td>On-Campus Confidential Resources:</td>
<td>Women's Center Counseling Services</td>
<td>Chicago Campus: Abbott Hall, Suite 1400 710 North Lake Shore Drive (312) 503-3400 <a href="mailto:s-walz@northwestern.edu">s-walz@northwestern.edu</a> <a href="http://www.northwestern.edu/womenscenter/">www.northwestern.edu/womenscenter/</a></td>
<td>Provides counseling services for faculty, students and staff members</td>
</tr>
<tr>
<td>On-Campus Confidential Resources:</td>
<td>CAPS: Counseling and Psychological Services</td>
<td>Evanston Campus: 633 Emerson Street, 2nd Floor (847) 491-2151 (24-hours)</td>
<td>Provides counseling services to students, also provides a counselor on-call 24 hours a day</td>
</tr>
<tr>
<td>On-Campus Confidential Resources:</td>
<td>CAPS: Counseling and Psychological Services</td>
<td>Chicago Campus: Abbott Hall, 5th Floor 710 N. Lake Shore Drive (312) 503-0936 (847) 491-2151 (after hours)</td>
<td>Provides counseling services to students, also provides a counselor on-call 24 hours a day</td>
</tr>
<tr>
<td>On-Campus Confidential Resources:</td>
<td>CAPS: Counseling and Psychological Services</td>
<td>Evanston Campus: 1870 Sheridan Road (847) 491-7256 (847) 864-7865 (after hours) <a href="mailto:chaplain@northwestern.edu">chaplain@northwestern.edu</a> <a href="http://www.northwestern.edu/religious-life/">www.northwestern.edu/religious-life/</a></td>
<td>Provides spiritual counseling and advice for all members of the University community</td>
</tr>
<tr>
<td>On-Campus Confidential Resources:</td>
<td>NU Life Matters</td>
<td>(855) 547-1851 (24 hours) <a href="http://www.northwestern.edu/hr/work-life/nu-life-matters.html">http://www.northwestern.edu/hr/work-life/nu-life-matters.html</a></td>
<td>Provides confidential crisis intervention and short-term counseling for faculty and staff, as well as their household family members at no cost.</td>
</tr>
</tbody>
</table>

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### Off-Campus Confidential Resources:

<table>
<thead>
<tr>
<th>Resource</th>
<th>Contact Information</th>
<th>Note</th>
</tr>
</thead>
<tbody>
<tr>
<td>Chicago Metro Rape Crisis Hotline (YWCA)</td>
<td>(888) 293-2080</td>
<td>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.</td>
</tr>
<tr>
<td>Chicago Domestic Violence Line</td>
<td>(877) 963-6338</td>
<td></td>
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<tr>
<td>Evanston Domestic Violence Line (YWCA):</td>
<td>(877) 718-1868</td>
<td></td>
</tr>
<tr>
<td>RAINN: Rape, Abuse &amp; Incest National Network</td>
<td>(800) 656-HOPE</td>
<td></td>
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<tr>
<td><a href="https://ohl.rainn.org/online/">https://ohl.rainn.org/online/</a></td>
<td>(online hotline)</td>
<td></td>
</tr>
<tr>
<td>Chicago Domestic Violence Line:</td>
<td>(877) 863-6338</td>
<td></td>
</tr>
<tr>
<td>Evanston Domestic Violence Line (YWCA):</td>
<td>(877) 718-1868</td>
<td></td>
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<tr>
<td>YWCA: Rape Victim Advocates</td>
<td>180 N. Michigan Ave, Suite 600, Chicago (312) 443-9603</td>
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<tr>
<td>Services include: medical and legal advocacy, counseling services (individual and group). Services are free and for survivors or friends/partners of survivors.</td>
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<tr>
<td>YWCA-Evanston</td>
<td>1215 Church St, Evanston (847) 864-8445</td>
<td></td>
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<tr>
<td>Services include: Counseling and support for survivors of dating/domestic violence, legal advocacy and residential services (emergency shelter)</td>
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<tr>
<td>Evanston Victim Services Program</td>
<td>Evanston Police Department 1454 Elmwood Avenue, Evanston <a href="http://www.cityofevanston.org/police/about-us/police-social-services/">http://www.cityofevanston.org/police/about-us/police-social-services/</a></td>
<td></td>
</tr>
<tr>
<td>Services include: crisis intervention for survivors of sexual violence and/or dating/domestic violence, medical and legal/court advocacy</td>
<td></td>
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<tr>
<td>Life Span Center for Legal Services and Advocacy</td>
<td>70 E. Lake Street, Suite 700, Chicago, (312) 408-1210</td>
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</tr>
<tr>
<td>Services include (for survivors of DV and SV): legal services, legal advocacy (i.e. assistance with Orders of Protection, etc.) and counseling.</td>
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<tr>
<td>Center for Contextual Change</td>
<td>9239 Gross Point Road, Skokie (847) 676-4447 x304 (for appointments or a confidential assessment) <a href="http://www.centerforcontextualchange.org">www.centerforcontextualchange.org</a></td>
<td></td>
</tr>
<tr>
<td>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.</td>
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<tr>
<td>Porchlight Counseling Services</td>
<td>(773) 750-7077 confidential helpline and intake</td>
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<tr>
<td>Services include: free counseling for survivors of sexual and/or domestic/dating violence</td>
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### 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/university-police-guarantee.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 a Deputy Title IX Coordinator regardless of whether the individual who experienced the sexual misconduct chooses to pursue criminal charges.

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

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

Evanston Police Department
Evanston Campus: 1454 Elmwood Avenue, Evanston
Phone: 911 or (847) 866-5000 (24 hours)
Website: www.cityofevanston.org/police/

Chicago Police Department – 18th District
(covers Chicago campus)
Chicago Campus: 1160 North Larrabee Ave., Chicago
Phone: 911 or (312) 744-4000 (24 hours)
Website: home.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 Title IX Coordinator or Deputy Title IX Coordinator for investigation. 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, unless they have a recognized confidentiality privilege. Further, the University encourages students and third parties who have observed or been made aware of sexual misconduct to report the incident to the Title IX Coordinator or a Deputy Title IX Coordinator for investigation.

The offices 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 interim protective measures and accommodations 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 in the Office of Student Conduct to oversee complaints of sexual misconduct against students.

Title IX Coordinator and Director of the Office of Sexual Harassment Prevention (Sexual misconduct complaints against faculty, staff, and third parties)
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 sexual-harassment@northwestern.edu
Website: http://www.northwestern.edu/sexual-misconduct

Office of Student Conduct
(Sexual misconduct complaints against students)
Contact: Tara Sullivan, Deputy Title IX Coordinator for sexual misconduct complaints against students; Assistant Dean of Students and Director of Student Conduct
Location: 601 University Place, Lower Level, Evanston
Phone: (847) 467-5078
Email: tara.sullivan@northwestern.edu or student-conduct@northwestern.edu
Online: publicdocs.maxient.com/reportingform.php?NorthwesternUniv&layout_id=31
Website: www.northwestern.edu/student-conduct

Other University Reporting Options

Office of Equal Opportunity and Access
(Discrimination and harassment complaints, including Title IX sex discrimination complaints)
Roberto Sanabria, Deputy Title IX Coordinator for Sex Discrimination Complaints; Director, Office of Equal Opportunity and Access
Location: 720 University Place, Evanston
Phone: (847) 491-7458
Email: roberto.sanabria@northwestern.edu or eeo@northwestern.edu
Website: www.northwestern.edu/hr/eeo

EthicsPoint
(For phone hotline or online complaints involving faculty, staff, and third parties):
Phone: (866) 294-3545
Website: secure.ethicspoint.com/domain/media/en/gui/7325/index.html

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. Interim Protective Measures & Accommodations

Interim protective measures and accommodations are reasonable measures the University can put in place to provide immediate support and added protection to an individual who reports having experienced sexual misconduct or retaliation, at no cost to that individual. These measures can be temporary in duration pending the results of an investigation, but can become permanent. Interim protective measures and accommodations 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
- Adjustment of course schedules or employment schedules
- Time off from class or work, or a leave of absence
- Transportation arrangements
- Safety planning

Interim protective measures and accommodations can be made 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 interim protective measures or accommodations are reasonable and should be implemented, and, if so, will work to ensure that interim protective measures or accommodations are implemented as soon as possible. The University will keep confidential any accommodations or protective measures provided, to the extent that maintaining such confidentiality would not impair the ability of the institution to provide the protective measures or accommodations.

To seek an interim protective measure or accommodation:

Students should contact any of the following:

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
Tara Sullivan, Deputy Title IX Coordinator for sexual misconduct complaints against students
Location: 601 University Place, Lower Level, Evanston
Phone: (847) 467-5078
Email: tara.sullivan@northwestern.edu or student-conduct@northwestern.edu
Website: www.northwestern.edu/student-conduct

Staff and faculty should contact:

Joan Slavin, Title IX Coordinator
Location: 633 Clark Street, #2-636, Evanston
Phone: (847) 491-3745
Email: j-slavin@northwestern.edu or sexual-harassment@northwestern.edu
Website: http://www.northwestern.edu/sexual-misconduct
http://www.northwestern.edu/sexual-harassment

Violations of directives related to interim protective measures or accommodations 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 & Resolution of Alleged Sexual Misconduct Violations

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 Title IX Coordinator to oversee complaints of sexual misconduct and retaliation involving staff, faculty and third parties, and the Deputy Title IX Coordinator in the Office of Student Conduct to oversee reports of sexual misconduct and retaliation against students. The University may also rely upon any Deputy Title IX Coordinator or Title IX Investigator, the Office of Equal Opportunity and Access, the Office of Human Resources, and outside investigators to conduct investigations, as needed. Further, a report of sexual misconduct or retaliation will be routed to the appropriate office for investigation, regardless of where it is initially directed.

The University’s investigative and resolution processes of reports of violations of this policy will be prompt, fair and impartial. The procedures set forth below are 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.

Complaints of sexual misconduct and retaliation will be investigated and resolved in accordance with this policy. Because such allegations can sometimes raise novel 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.

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
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 interim protective measures and accommodations, 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 interim measures and accommodations 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. A union representative may serve as an advisor, where applicable. An advisor may not speak, write, or otherwise communicate with an investigator, hearing officer or panel on behalf of the complainant or respondent, and, because these are internal University proceedings, may not function as legal counsel.

To enhance the integrity of the investigation process and help ensure fairness for all parties, 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. In matters in the Office of Student Conduct, advisors must also be members of the Northwestern community.

However, 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. In this case, the advisor is still limited to the supportive and not participatory role described above. Advisors who do not abide by these guidelines may be excluded from the process.

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 to keep the information related to the investigation private, to the extent consistent with applicable law. Witnesses and advisors will be directed to maintain complete confidentiality.

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.

E. Investigations and resolution of complaints against faculty, staff and third parties

The University Sexual Harassment Prevention Office (USHPO), through the Title IX Coordinator, Title IX Investigator, or designee, investigates complaints of sexual misconduct, including complaints of sexual harassment and sexual assault, brought against faculty, staff and third parties.

When a complaint is received, the Title IX Coordinator, Title IX Investigator, or designee interviews parties and witnesses and reviews any relevant documents and evidence. Once an investigation is completed, the investigator makes findings on whether the preponderance of the evidence indicates that the respondent violated the University’s Policy on Sexual Misconduct. The investigator advises the parties of the findings in writing, and communicates findings and recommendations to other University offices as needed for resolution and determination of sanctions or corrective actions. Most investigations are completed within 60 days. Parties may file an appeal of an investigator’s findings.

USHPO’s Complaint Resolution Guidelines describe in detail the process used to investigate complaints of sexual misconduct against faculty, staff, and third parties, as well as the process for appealing the findings and sanctions and corrective actions. [http://www.northwestern.edu/sexual-harassment/where-to-get-help/what-happens-with-a-complaint.html](http://www.northwestern.edu/sexual-harassment/where-to-get-help/what-happens-with-a-complaint.html).
F. Investigations and resolution of reports against students

The Deputy Title IX Coordinator for sexual misconduct complaints against students, Title IX Investigator, or designee, investigates reports of alleged violations of this policy by Northwestern students.

When a report is received, the Deputy Title IX Coordinator or designee will conduct an initial inquiry to determine the resolution plan. If action is required to remediate the impact of the alleged policy violation, the Deputy Title IX Coordinator will take interim actions or make accommodations as appropriate. If the report has not been resolved informally, the matter will then be assigned to an investigator who will gather full details related to the report. The investigator will interview the parties and relevant witnesses and review relevant documents and evidence.

Resolution of these reports is determined through the University Hearing and Appeals System (UHAS) which is managed by the Office of Student Conduct (OSC). Under the UHAS process, if it is determined by the Director of OSC that the alleged policy violation has the potential to result in a separation from the University (e.g., suspension, exclusion, expulsion, degree revocation), the investigator will complete an investigative report that includes details of the investigation and the investigator’s findings of fact. The report will be provided to the individual reporting the misconduct, the respondent, and the University’s hearing panel. A Panel hearing will be held, in which the parties will have the opportunity to meet with the panel individually. The panel will determine responsibility for policy violations and, if applicable, sanctions. If it is determined by the Director of OSC that the alleged policy violation does not have the potential to result in separation from the University, it will be resolved through an Administrative hearing.

Most investigations are completed within 60 days. There is a review/appeals process available to both reporters and respondents in all cases. Complete procedures for the University Hearing and Appeals System can be found in the student handbook [http://www.northwestern.edu/student-conduct/shared-assets/studenthandbook.pdf](http://www.northwestern.edu/student-conduct/shared-assets/studenthandbook.pdf)

G. Complaints regarding the specific allegations of sexual assault, stalking, dating or domestic violence

Individuals who report to the Title IX Coordinator, a Deputy Title IX Coordinator, or University Police that they have experienced sexual assault, stalking, or dating or domestic violence, whether the offense occurred on- or off-campus, will be provided with a written explanation of their rights, options, and resources including a link to this policy. Specifically, this notice will include information about:

- Services and resources related to counseling, health and mental health, legal, visa and immigration, and student financial aid;
- Interim protective measures and accommodations, and how to request them during the course of the investigation;
- The procedures for institutional disciplinary action in cases of sexual assault, dating or domestic violence and stalking; and
- Preserving evidence, reporting to law enforcement, being assisted by University officials in reporting to law enforcement, seeking a protective order, and confidentiality.

7. Educational Training, Awareness and Prevention Programs

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

**Appendices**

Appendix A: Resource of Relevant Terms and Definitions in Illinois


**Related Information**

Appendix A, B and C 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  
Amended Date: October 30, 2014  
Last Amended Date: September 10, 2015

**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 acquaintance 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 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.

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).

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:


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 (305) 442-1600. For corresponding information on the Northwestern Chicago and Evanston campuses, contact the University Police Criminal Investigations (847) 467-0654.

Campus Sexual Misconduct Climate Survey

In 2015, the University conducted a Campus Climate Survey on Sexual Misconduct. The survey sought student perspectives and experiences related to sexual misconduct, including sexual assault, sexual exploitation, stalking, dating and domestic violence, and sexual harassment at Northwestern.

All students aged 18 or older, who were enrolled at Northwestern University at the time the survey was initiated, were invited to complete the survey, regardless of whether they have experienced sexual misconduct. This includes undergraduate, graduate and
professional students enrolled in the eleven schools/colleges on
the Evanston and Chicago campuses.

The data collected will provide a measure of the scope and nature
of sexual misconduct at Northwestern University and inform the
design and implementation of intervention and prevention strategies
tailored to the needs of our students.

For additional information on the survey process and results, contact
the Director of Student Affairs Assessment
(sa-assessment@northwestern.edu) (847) 491-8431).

VII. Timely Warnings, Emergency Notifications,
Emergency Preparedness

A. Timely Warnings and Emergency Notifications

Timely warnings, in the form of Crime Alerts, will be disseminated by
Northwestern University in a timely manner and utilizing method(s)
likely to reach members of the affected campus community when the
reported incident is a Clery crime that:
(1) is reported to a Campus Security Authority or University Police
in a timely manner; (2) occurs in the University Clery geography
(on campus, public property bordering campus or non-campus /
off campus University leased and/or controlled property and;
(3) is determined, in the judgment of the University Police, Associate
Vice President (AVP) for Public Safety and Chief of Police, or
designee (typically the Assistant Vice President/Deputy Chief,
Deputy Chief or Commander), to represent a serious or continuing
threat to University community members. Issued Crime Alerts will
not include the names and other identifying information of victims.

The Clery Act does not require universities to issue community
Crime Alerts on Clery crimes occurring outside of the geographical
areas noted in item 2 (in above paragraph), or on non-Clery crimes.
However, designated University officials may, in their discretion,
choose to provide community Crime Alerts on crimes outside timely
warning procedural designated parameters. In short, the University
will notify and inform community members under either its timely
warning or emergency notification procedures of any emergency or
dangerous situation when such events represent a serious, immediate
or continuing threat to the health or safety of University community
members.

Emergency Notification is an announcement to inform the
University community about a “significant emergency or danger-
ous situation involving an immediate threat to the health or safety
of students or employees occurring on the campus.” An emergency
response expands upon the definition of “timely warning”, as
it includes both Clery crimes and other types of emergencies
(examples: a fire, infectious disease outbreak, terrorist attack, natural
disaster, weather emergency). For additional information on
community emergency notification, see the “Emergency
Preparedness” section in this Report.

Crime Alerts are usually distributed for the following Uniform
Crime Reporting Program (UCR) classifications: major incidents of
arson, criminal homicide and robbery. Cases of aggravated assault,
sex offenses, dating violence, domestic violence, stalking and all
other Clery crimes are considered on a case by case basis. Case by
case consideration includes, but is not limited to, reviewing the facts
surrounding a reported crime, the nature of the crime, the timeliness
of University Police receipt of the reported crime, the crime
occurrence location, the serious or continuing threat to the campus
community, the possible risk of compromising law enforcement
efforts and the factors listed in point 1 (below).

1) University Police may not issue a Crime Alert for a Clery crime if:
   • University Police, or another law enforcement agency,
   apprehends the suspect(s) and the serious or continuing
   threat to members of the Northwestern University
   community has been mitigated by the apprehension;
   • A report was not filed with University Police or if
University Police was not notified of the crime in a manner
that would allow University Police to post a “timely” notice
for the University community. The term “timely”, for
community notification purposes, is typically considered
to be University Police receiving notice of a Clery crime
within 7 days following the occurrence of a crime.
The AVP for Public Safety and Chief of Police (or designee, typically the Assistant Vice President/Deputy Chief, Deputy Chief or Commander) consults with University Police Administrator(s) and/or on-duty shift supervisor(s) to substantiate and ascertain pertinent incident information. University Police incident reports, as available, may also be reviewed by the noted administrators to assist in the assessment and Crime Alert distribution decision process. As deemed appropriate, the AVP for Public Safety and Chief of Police (or designee, typically the Assistant Vice President/Deputy Chief, Deputy Chief or Commander) may also consult with local law enforcement and other relevant University officials.

The AVP for Public Safety and Chief of Police (or designee, typically the Assistant Vice President/Deputy Chief, Deputy Chief or Commander) assesses incident information to determine whether a community Crime Alert notice for a reported crime shall be issued to the affected University community. All University Police incident reports are reviewed by a University Police Command Staff member (typically Commander, Deputy Chief, the Assistant Vice President/Deputy Chief or AVP for Public Safety and Chief of Police) to assess whether incidents reported to University Police represent a serious or continuing threat to University community members.

The AVP for Public Safety and Chief of Police (or designee, typically the Assistant Vice President/Deputy Chief or Deputy Chief) develops the content of Crime Alerts in consultation with the Vice President of University Relations (or designee, typically the Director or Associate Director of Media Relations). Together they agree to initiate any or all of the emergency notifications systems in their discretion. The Vice President of 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 (Emergency Services Division Commander, Emergency Services Division Director and the Director of Security Systems/Technical Services) have the ability to initiate any or all emergency notification systems.

Independently or in conjunction with one another, two community emergency notification system methods are typically utilized: the internal bulk e-mail system which is used to target message(s) to students, faculty and staff on the affected campus and/or the Blackboard Connect system which allows designated University Relations personnel (or designee) to send message(s) very quickly to the entire campus community via phones, e-mail, text messages and social media (i.e. Facebook and Twitter). Initial Crime Alert community notification messages are always posted on the University and University Police websites. The University may provide follow-up Crime Alert information to the affected community as determined to be necessary / appropriate. For all issued Emergency Notifications, the University will provide at least 1 follow-up message to provide additional incident information to the affected community. Crime Alert and Emergency Notification follow-up messages are typically posted on the University website and the mass notification systems, as appropriate. Members of the larger community who are not affiliated with Northwestern University, but need additional information, may visit the University website for updated emergency information.

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.

Crime Alerts will generally include a succinct statement describing the incident, the exact location and time it occurred, if known, suspect(s) location (known or unknown), suspect(s) description (as credible / useful information exist), method of operation and / or possible connection to previous incidents (as applicable), injury(ies) sustained by the victim(s), if relevant, and personal safety information to aid members of the University community in protecting themselves from becoming victims of a similar crime and to promote overall safety. Typically, the AVP for Public Safety and Chief of Police (or designee, typically the Assistant Vice President/Deputy Chief, Deputy Chief or Commander) will determine in his/her discretion the appropriate categories of information to be included in a Crime Alert to promote safety.
B. Emergency Preparedness

Northwestern University is committed to notifying and informing its campus community in the event of an emergency. Upon confirmation of a significant emergency or dangerous situation involving an immediate threat to the health or safety of students, faculty or staff, Northwestern University will use appropriate communications channels to immediately notify the community. The University’s 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.

Community 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 information, including but not limited to, posting fliers in public places, faxes and notifying local media. All communication/notification methods identified herein shall be considered available on all Northwestern University campuses (Chicago, Evanston, Miami, Qatar and Washington, DC) unless otherwise specifically identified as being limited to a particular campus.

Emergency Communication Capabilities
Emergency Notification System - Blackboard Connect is a service provided by an outside vendor that can call phones, send text message, e-mail information and send social media messages, via Twitter and Facebook rapidly when activated to alert community members. Because Northwestern might need to contact you before you arrive on campus in an urgent emergency situation, it is important that all possible means of contacting you at home and at work are current in the Blackboard Connect database. On the NU-Q (Qatar) campus social media messaging such as Blackboard, Connect, Twitter, and Facebook is not utilized. For instructions on how University community members can enter or update their Emergency Contact information, visit https://ses.northwestern.edu/contactinfo.htm (student) or 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 during emergency situations.

Main Website “Breaking News” - Breaking News at http://www.northwestern.edu/ is a web page on the Northwestern website that can be activated in the event of an emergency. The 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. Installation 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; Senior Vice President for Business and Finance; Vice President for University Relations; AVP
for Public Safety / Chief of Police; 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 AVP of Public Safety and Chief of Police (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 of 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 of 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 (Emergency Services Division Commander, Director of Emergency Management, Director of University Security Systems and Director of Security Systems/Technical Services, and Communications Officers) have the ability to initiate any or all emergency notification systems.

Independently or in conjunction with one another, two community emergency notification system methods are typically utilized: the internal bulk e-mail system which is used to target message(s) to students, faculty and staff on the affected campus and / or the Blackboard Connect system which allows designated University Relations personnel to send message(s) very quickly to the entire campus community via phones, e-mail, text messages and social media (i.e. Facebook and Twitter). Initial emergency and timely warning community notification messages are always posted on the University and University Police websites as an emergency alert, security alert or crime alert. The University will typically provide follow-up information using the emergency alert designations (emergency alert, security alert or crime alert) posted on the University website and mass notification systems, when appropriate. Members of the larger community who are not affiliated with Northwestern University, but need additional information may visit the University website for updated emergency information.

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.

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 and 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 AVP for Public Safety and Chief of Police, Assistant Vice President / Deputy Chief, Deputy Chief, and/or Police Commander. Following the initial brief a determination will be made by the AVP for Public Safety and Chief of Police, Assistant Vice President / Deputy Chief, Deputy Chief, and/or Police Commander as to the threat level and impact to the university. If the AVP for Public Safety and Chief of Police, 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 AVP for Public Safety and Chief of Police 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 through with University personnel involved to resolve the situation. The AVP for Public Safety and Chief of Police is responsible for notifying the Vice President of University Relations of the need to issue emergency communications and will keep the Vice President of 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 AVP for Public Safety and Chief of Police and Vice President of University Relations, in consultation with the TAG, members of the EOC, and any other assigned University officials will determine the appropriate segment(s) of the campus community to receive notification, the content of any notification, and initiate the notification system 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 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 must 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. 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 AVP for Public Safety / Chief of Police 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.

Evacuation
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 for assistance in development of an Evacuation Plan. Student Affairs distributes the following documents to students residing in University and Greek housing – Residence Hall Safety Procedures and Rules or Greek House Safety Procedures and Rules (http://www.northwestern.edu/risk/safety-procedures/student-housing/index.html). These documents contain emergency evacuation and safety procedures for natural disasters.

Emergency Response and Evacuation Testing
The Blackboard Connect system is tested quarterly and 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 AVP for Public Safety and Chief of Police. 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.

As a living document, 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) require colleges and universities to annually update, exercise, and notify the campus community as well as state legislation requiring college 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.

A copy of the Tenant Handbook and Emergency Manual is available in Office 124, 95 Merrick Way (305) 441-7187.

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).

For information on Northwestern University Chicago and Evanston campus emergency preparedness procedures, see the “Emergency Preparedness” section (point B on page 58).

**VIII. Campus Facilities and Building Security**

**A. Access to and Security of Kellogg – Miami Facility**

The Alhambra lobby security station is located in the 1st 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 am – 5:00 pm) 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), 7:00 a.m. to 6:00 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 the following situations. The University reserves the right to investigate and resolve reports of alleged misconduct in all of these situations:

• 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).

• 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: http://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 (http://www.northwestern.edu/hr/policies-forms/policies-procedures/staffhandbook.html); in the Student Handbook (http://www.northwestern.edu/student-conduct/shared-assets/studenthandbook.pdf); and in the booklet University Policy on Drugs and Alcohol (at http://www.northwestern.edu/alcohol-resources/about-us/biennial-review/assets/1771-1-drug-alcohol-021015.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 Northwestern University Police Department and other surrounding and remote campus law enforcement agencies enforce all local, State and Federal drug and liquor laws, including underage drinking violations. Individuals found in violation may be issued a citation, arrested and/or (if an employee or student), referred. As applicable, University community members are held accountable for their actions through state law, city ordinance and the University’s student disciplinary processes.

Counseling Assistance
There are no University based drug or alcohol abuse education programs available at the Kellogg – Miami campus. 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 (http://www.northwestern.edu/counseling/). University employees can access professional counseling support and services through an employee assistance program (“NU Life Matters”). For additional information, visit http://www.northwestern.edu/hr/work-life/nu-life-matters.html.

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

C. 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/safety-procedures/campus-buildings-offices/employee-safety-handbook.html. For information on radiation, chemical, and biological laboratory safety and on hazardous chemicals, human blood or other potentially infectious human materials, visit the Office for Research Safety (ORS) website at http://www.research.northwestern.edu/ORS/.
D. EthicsPoint Reporting

Northwestern has selected EthicsPoint to provide community members with a way to report activities that may involve misconduct or violations of University policy. You may file a report by dialing (866) 294-3545 or on the following website, https://secure.ethicspoint.com/domain/media/en/gui/7325/index.html. This service 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 policy prohibits the taking of retaliatory action against anyone for reporting or inquiring about potential breaches of University policy or seeking guidance on how to handle suspected breaches.
Appendix A
Kellogg – Miami Campus Trainings
(specifically focused on
sexual assault, domestic violence,
dating violence and stalking)
The Northwestern University main campus (Evanston) continues to work with Northwestern’s remote campuses in developing additional training initiatives, programs and campaigns in accordance with the Violence Against Women Act. On average, the Kellogg Miami campus supports 140 students and has no on site faculty (all faculty are based on the Evanston campus) and 10 support staff. Establishing and evaluating VAWA training initiatives, programs and campaigns will be an ongoing process on the Kellogg Miami campus.

<table>
<thead>
<tr>
<th>NAME OF CAMPAIGN/ PROGRAM</th>
<th>AUDIENCE</th>
<th>WHEN OFFERED</th>
<th>REQUIRED?</th>
<th>BRIEF DESCRIPTION</th>
</tr>
</thead>
<tbody>
<tr>
<td>Orientation</td>
<td>Staff</td>
<td>August</td>
<td>Yes</td>
<td>Overview of harassment and discrimination examples and polices. Overview of VAWA</td>
</tr>
<tr>
<td>Orientation</td>
<td>New Students</td>
<td>September/January</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>On-going</td>
<td>Yes</td>
<td>Posters with information about sexual harassment and discrimination policies posted in high traffic areas</td>
</tr>
<tr>
<td>Pamphlets</td>
<td>All new students and staff</td>
<td>On-going</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>All students</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>Seminar</td>
<td>All staff</td>
<td>August</td>
<td>Yes</td>
<td>Session led by Coral Gables Police department on safety and reporting of crime. Session to be recorded for new staff and for refresher purposes</td>
</tr>
</tbody>
</table>

Kellogg Miami is working with Northwestern University’s Sexual Harassment Prevention office to explore comprehensive trainings solutions that could be leveraged by professional students and University staff of the Miami campus. The University has selected a vendor to provide online Violence Against Women and Title IX training for faculty, staff and graduate students.

In addition, Kellogg Miami is currently exploring local resources (other universities and local law enforcement offices) to determine whether there are other relevant resources that could be incorporated into our programming.

The Kellogg Miami campus administration is also exploring VAWA informational sessions that can be incorporated into the annual orientation for faculty, staff and students.
Appendix B

Clery Act Crimes and Reportable Locations (Definitions)
Provided crime data tables reflect the mandatory reporting offenses as specified in the Jeanne Clery Act (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:** 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:** 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; house-breaking; 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 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 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.

**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 cohabiting 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.

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1 For incidents that occur outside of the U.S. (e.g., study abroad programs), Illinois law will apply in determining a violation of this policy.
2 For incidents that occur outside of the U.S. (e.g., study abroad programs), Illinois law will apply in determining a violation of this policy.
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: The violation of state laws or ordinance prohibiting: the manufacture, sale, transporting, furnishing, possessing of intoxicating liquor; maintaining unlawful drinking places; bootlegging; operating a still; furnishing liquor to minor or intemperate person; using a vehicle for illegal transportation of liquor; drinking on a train or public conveyance; all attempts to commit any of the aforementioned. (Drunkenness and driving under the influence are not included in this definition.) (Alcohol violations referred for campus disciplinary action under the Campus Code need not be reported to the Police Department.) The Clery Act does not require the reporting of public drunkenness or driving while under the influence offenses.

Weapons Violation: the violation of state laws or ordinances dealing with weapon offenses, regulatory in nature, such as: manufacture, sale, or possession of deadly weapons; carrying deadly weapons, concealed or openly; furnishing deadly weapons to minors; aliens possessing deadly weapons; all attempts to commit any of the aforementioned.

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 property owned or controlled by an institution within the same reasonably contiguous geographical area and used by the institution 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 paragraph (1) of this definition, that is owned by Northwestern University 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. The Clery Act does not require disclosure of crime statistics for public property that surrounds non-campus buildings or property.
Appendix C

Supplemental Kellogg – Miami Campus Sexual Misconduct Policy Content
Crime Definitions Under Florida Law

Consent (Florida State Statute 794.011(1)(a) is defines 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 (Florida State Statute 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
   c. Sexual Abuse or Battery – Any unwanted touching or forcing of someone to engage in a sexual act against his or her will

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) sexual violence 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 cyber stalks 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>Hotlines (not staffed by or affiliated with Northwestern)</td>
<td>RAINN: Rape, Abuse &amp; 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 at (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, FL 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, FL 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 Ave, Miami, FL 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 St.
Coral Gables, FL 33134
(305)442-1600

**City of Miami Police Department**
400 NW 2nd Avenue
Miami, FL 33128
(305)579-6111

**South Miami Police Department**
6130 Sunset Drive South
Miami, FL 33143
305-663-6301
(Continued)

Miami-Dade Police Department
9105 NW 25 St.
Doral, FL 33172
(305)476-5423
http://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/5902c323b86a1dff85256cc5007ac59b!OpenDocument.
Appendix D
Local / 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
(Sexual Assault Education & Violence Prevention) (847) 491-2146

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

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

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

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
Appendix E

Crime Data: Kellogg - Miami Campus
<table>
<thead>
<tr>
<th>Offense (Reported By Hierarchy) ¹</th>
<th>Year</th>
<th>Crime Occurrence Locations</th>
<th></th>
<th>On Campus</th>
<th>Non-Campus</th>
<th>Public Property</th>
<th>Total</th>
<th>Unfounded Crimes ²</th>
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<td>Drug Law Arrests</td>
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</table>

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.

On October 20, 2014, the U.S. 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.”

The list of Clery Crimes was amended by U.S. Department of Education regulations, effective July 1, 2015. These regulations generally re-categorized 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.

On October 20, 2014, the U.S. 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 2012, 2013 and 2014 reporting years, Northwestern University has received no reports of any Clery Act recognized Hate Crime.

---

**Offense (Reported By Hierarchy)**

<table>
<thead>
<tr>
<th>Offense (Reported By Hierarchy)</th>
<th>Year</th>
<th>On Campus</th>
<th>Non-Campus</th>
<th>Public Property</th>
<th>Total</th>
<th>Unfounded Crimes</th>
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<td>Weapon Law Arrests</td>
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<td>Liquor Law Violations Referred for Disciplinary Action</td>
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**Offense (Crimes Not Reported By Hierarchy)**

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<th>Year</th>
<th>On Campus</th>
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</tbody>
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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.

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3 The list of Clery Crimes was amended by U.S. Department of Education regulations, effective July 1, 2015. These regulations generally re-categorized 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.

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

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