Northwestern | OFFICE OF CIVIL RIGHTS AND TITLE IX COMPLIANCE

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Illinois Preventing Sexual Violence in Higher Education Act Annual Report

Northwestern University is committed to fostering an environment in which all members of our community are safe, secure, and free from sexual misconduct of any form. Northwestern's Policy on Discrimination, Harassment, and Sexual Misconduct prohibits all forms of sexual misconduct, including sexual assault, sexual exploitation, stalking, dating and domestic violence, and sexual harassment. Additionally, pursuant to the United States Department of Education's Final Rule on Title IX Sexual Harassment, the University has adopted the Policy on Title IX Sexual Harassment. When an incident of alleged sexual misconduct is reported to the University, whether it is reported in person, by email, electronically, anonymously, or through another person, the Office of Civil Rights and Title IX Compliance reaches out to the potentially impacted person(s) to offer information and resources, including our resource guides on sexual misconduct.

A person who reports an act of sexual misconduct by a member of the Northwestern community has the option to request that the University adjudicate whether a violation of University policy occurred. Disciplinary action can be taken against any student, staff, or faculty member who is determined to have violated either policy. When Northwestern receives reports alleging sexual misconduct by individuals not affiliated with the University (and not otherwise connected to a University program or activity), support and resources are offered to the impacted individual(s) and other measures that may be needed to secure the safety of the community are also taken.

Northwestern University has two campuses in Illinois: a 240-acre campus in Evanston and a 25-acre campus in Chicago.[1] Northwestern's Policy on Discrimination, Harassment, and Sexual Misconduct and Policy on Title IX Sexual Harassment apply to both campuses. The University's Office of Civil Rights and Title IX Compliance works with community members on both the Evanston and Chicago campuses to address and resolve all reports of sexual misconduct. The data in this report reflects reports received from both the Chicago and Evanston campuses with a delineation of the data from each campus.

The data described in this report was assembled using the parameters included in the Illinois Preventing Sexual Violence in Higher Education Act (110 ILCS 205/9.21(b)) and the Frequently Asked Questions Regarding Reporting Requirements document issued by the Illinois Attorney General's Office, revised on October 14, 2020. Accordingly, this report contains student reports

[1] In addition to the geographic size difference between the Chicago and Evanston campuses, there are no residential facilities on the Chicago campus.

of sexual misconduct occurring within Clery geography or those reported without a known location.[2]

Part A.

(1) A copy of the higher education institution's most recent comprehensive policy in accordance with Section 10 of the Preventing Sexual Violence in Higher Education Act.

Northwestern University's Policy on Discrimination, Harassment, and Sexual Misconduct is available online at: https://www.northwestern.edu/civil-rights-office/policies-procedures/policies/policy-on-discrimination-harassment-and-sexual-misconduct-2025-2026.pdf

Northwestern University's Policy on Title IX Sexual Harassment is available online at: https://www.northwestern.edu/civil-rights-office/policies-procedures/policies/policy-on-title-ix-sexual-harassment-2025-2026.pdf

(2) A copy of the higher education institution's most recent concise, written notification of survivor's rights and options under its comprehensive policy, required pursuant to Section 15 of the Preventing Sexual Violence in Higher Education Act.

Northwestern University's Resource Guide, which provides written notification of a survivor's rights and options, are available online at:

- https://www.northwestern.edu/civil-rights-office/docs/3422_b_ocr_titleixsexharass_resourceguide_032624.pdf
- https://www.northwestern.edu/civil-rights-office/docs/3422_a_ocr_discrimharasssexmisconduct_resourceguide_022924.pdf

Part B.

I. Campus Training, Education and Awareness

Primary prevention training for undergraduate and graduate students was provided through Vector Solutions. The Vector modules include definitions of consent, sexual violence, the relationship between drugs, alcohol and the ability to consent, customized sections for Northwestern's reporting options on and off campus, confidential advisors and survivor support services, bystander intervention strategies, and skill building for culturally sensitive responses to survivors. All incoming first year and transfer students completed the first learning module in the vendor's undergraduate series, RespectEDU for College. In addition, returning undergraduates were assigned the RespectEDU for College. The course RespectEDU for Graduate Students was assigned to all new and returning graduate students, including both full time and part-time graduate

[2] The number of incidents in this report may not align with the numbers in Northwestern's Annual Security and Fire Safety Report made pursuant to the Clery Act. Clery Act data is limited to incidents occurring on campus or in the area immediately surrounding campus, while the data in this report also includes incidents where a location was not known. Further, unlike Clery Act data, this report encompasses only those concerns reported by or on behalf of students and includes reports made to confidential resources.

students. While all programs covered federal and Northwestern annual training requirements, the scenarios and examples utilized in modules were tailored to be relevant for those groups.

A primary prevention effort required for all first year and transfer undergraduate students was "Student Body," a sexual violence and healthy relationships theatrical performance with small group processing and resource sharing discussions afterwards. The Center for Student Advocacy and Wellness (CSAW) organized and trained these small group leaders and ensured content during the performance highlighted confidential campus resources, survivor support services, reporting options, definitions and examples of consent and sexual violence behaviors, bystander intervention, risk reduction, and healthy communication. CSAW also provided training to students and student groups through the Northwestern University Bystander Intervention Program (NUBI), which is a bystander intervention program that was developed to help people identify and interrupt moments of harm or potential harm. While NUBI was initially implemented around topics of sexual assault, relationship violence, and stalking, the training has been broadened to think about how people observing a situation can take an active role in intervening to stop immediate harm, and ideally future harm, from happening.

Primary prevention training for all faculty and staff utilized the Vector online modules to reach all employees and addressed the requirements of VAWA, IPSVHEA, the Chicago Human Rights Ordinance, and University policies. The interactive module RespectEDU for Supervisors: Preventing Harassment and Discrimination and RespectEDU for Faculty and Staff: Title IX and Clery Act educated participants about sexual misconduct, sex discrimination, sexual assault, sexual harassment, sexual exploitation, dating and domestic violence, and stalking. Customization options on the platform also allowed our office to include information about survivor services at Northwestern, confidential campus resources, reporting options on campus, reporting obligations, associated laws and University policies.

A full list of both primary prevention and awareness programs for students and employees, in addition to ongoing awareness programming is available in the University's Annual Security and Fire Safety Report.

II. Reports

- From January 1, 2025 – December 31, 2025, the Title IX Coordinator/responsible employees received 29 reports of sexual violence (reports of sexual penetration without consent or sexual contact without consent under Northwestern's Policy on Discrimination, Harassment and Sexual Misconduct, or reports of Title IX sexual assault under Northwestern's Policy on Title IX Sexual Harassment) made by or on behalf of students that were reported as occurring either within Clery geography or were reported without a known location. Of these reports, 17 alleged conduct that took place on the Evanston campus, 1 report alleged conduct that took place on the Chicago campus, and 11 reports had unknown locations of the alleged conduct.

- From January 1, 2025 – December 31, 2025, the Title IX Coordinator/responsible employees received 21 reports of dating/domestic violence (under either Northwestern's Policy on Discrimination, Harassment and Sexual Misconduct, or Northwestern's Policy

on Title IX Sexual Harassment) made by or on behalf of students that were reported as occurring either within Clery geography or were reported without a known location. 13 of these reports alleged conduct that took place on the Evanston campus, and 8 reports had unknown locations of the alleged conduct.

- From January 1, 2025 – December 31, 2025, the Title IX Coordinator/responsible employees received 40 reports of stalking (under either Northwestern's Policy on Discrimination, Harassment and Sexual Misconduct, or Northwestern's Policy on Title IX Sexual Harassment) made by or on behalf of students that were reported as occurring either within Clery geography or were reported without a known location. 22 of these reports alleged conduct that took place on the Evanston campus, 1 alleged conduct that took place on the Chicago campus, and 17 reports had unknown locations of the alleged conduct.

- Northwestern has several confidential resources (including confidential advisors) that provide support and resources to students on both the Evanston and Chicago campuses. These resources were asked to provide aggregate data for reports of sexual misconduct received from January 1, 2025 – December 31, 2025, consistent with any applicable professional privilege. Northwestern's confidential resources provided aggregate data for reports from students in 2025 reflecting the receipt of 86 reports of sexual violence, 48 reports of dating/domestic violence, and 31 reports of stalking. The aggregate data did not include information on the location of these reports. Due to the confidential nature of the data provided, the University cannot ascertain whether these reports were also made to additional staff/offices on campus.

Response to reports to the Title IX Coordinator or Responsible Employees

Per ILCS 155/15, all reports or disclosures made to the Title IX Coordinator or responsible employees were responded to with outreach (see Part A) that included information on how to connect with or report to law enforcement.

- Of the 29 reports of sexual violence (reports of sexual penetration without consent or sexual contact without consent under Northwestern's Policy on Discrimination, Harassment, and Sexual Misconduct, or reports of sexual assault under Northwestern's Policy on Title IX Sexual Harassment) received by the Title IX Coordinator or responsible employees, 25 students chose not to proceed with complaint resolution, did not respond to outreach and follow up, or involved an anonymous student as complainant or unknown/unaffiliated respondent;. After reviewing each of these reports, the University determined that it could honor the student's request not to move forward with an investigation and/or could not proceed as it did not have sufficient information or jurisdiction over the respondent. The University conducted a formal investigation for 3 reports of sexual violence under its complaint resolution processes and referred one report through another complaint resolution procedure.

- Of the 21 reports of dating/domestic violence received by the Title IX Coordinator or responsible employees, 19 students chose not to proceed with complaint resolution, did not respond to outreach and follow up, or listed an anonymous student as complainant or unknown/unaffiliated respondent. After reviewing each of these reports, the University

determined that it could honor the student's request not to move forward with an investigation and/or could not proceed as it did not have sufficient information or jurisdiction over the respondent. The University referred two reports through other complaint resolution procedures.

- Of the 40 reports of stalking received by the Title IX Coordinator or responsible employees, 33 students chose not to proceed with complaint resolution, did not respond to outreach and follow up, or listed an anonymous student as complainant or unknown/unaffiliated respondent. After reviewing each of these reports, the University determined that it could honor the student's request not to move forward with an investigation and/or could not proceed as it did not have sufficient information or jurisdiction over the respondent. The University formally investigated 2 reports of stalking under its complaint resolution process and referred five reports through other complaint resolution procedures.

Note: All students were offered resources, including the ability to request interim measures and support services, regardless of whether the student responded to outreach or whether or not they wished to proceed with the complaint resolution process. In some of these cases, the University also addressed the concern through informal action. Informal action involves measures taken by the University in response to a situation or report of sexual misconduct when formal resolution is not desired by the person who may have experienced sexual misconduct, or when there is not enough information to proceed with a formal resolution process against a known respondent. Informal action is not used when formal resolution is desired by a complainant and the respondent's identity is known. Informal action does not result in findings related to responsibility or in sanctions. Informal actions include, but are not limited to, an educational meeting with the subject of the report or training for a group or unit.

Complaint Resolution Procedure Outcomes

- The University received 3 reports of sexual violence in 2025 for which an investigation was opened. In these matters, 1 report was resolved through alternative resolution, and 2 of the investigations concluded with the respondent being found not responsible. Additionally, 1 report of sexual violence received in 2024 for which an investigation was opened was resolved. In that matter, the respondent was found responsible and expelled.

- The University received 2 reports of stalking in 2025 for which an investigation was opened. In these matters, 1 investigation concluded with the respondent being found responsible and 1 investigation concluded with the respondent being found not responsible. In the matter that resulted in the determination of responsible, the disciplinary outcome was suspension.

Part C.

Additional information about Northwestern's response to sexual misconduct can be found on our website at: www.northwestern.edu/sexual-misconduct. Questions or concerns can be directed to Northwestern's Title IX Coordinator, Emily Babb, at ocr@northwestern.edu.