

Annual Report September 1, 2019-August 31, 2020

I. Introduction

Northwestern is committed to fostering an environment in which all members of our community are free from discrimination and harassment—including sexual misconduct. Such conduct violates the values of our institution and disrupts the living, learning, and working environment for students, faculty, staff, and other community members.

The University's [Interim Policy on Title IX Sexual Harassment](#) prohibits quid pro quo harassment by an employee; severe, pervasive, and objectively offensive unwelcome conduct of a sexual nature; and Sexual Assault, Dating Violence, Domestic Violence, or Stalking as defined under the Clery Act and VAWA. The University's [Policy on Institutional Equity](#) prohibits discrimination and harassment on the basis of race, color, religion, national origin, sex, pregnancy, sexual orientation, gender identity, gender expression, parental status, marital status, age, disability, citizenship status, veteran status, genetic information, reproductive health decision making, or any other classification protected by law in matters of admissions, employment, housing, or in the educational programs or activities it operates. Additionally, allegations of sexual misconduct that do not fall within the jurisdiction of the Interim Policy on Title IX Sexual Harassment may fall within the jurisdiction of this Policy.¹

The [Office of Equity](#) works to uphold the University's commitment by:

- Responding to reports of sexual misconduct, discrimination, and harassment, including by helping students, faculty, and staff understand the University's processes for making such reports;
- Providing support and resources to those impacted by sexual misconduct, discrimination, and harassment;
- Providing training, consultation, and resources to the University community regarding accommodating individuals with disabilities, the University's affirmative action programs for faculty and staff, and responding to reports of sexual misconduct, discrimination, and harassment; and
- Working with students, faculty, and staff to revise and implement policies related to sexual misconduct, discrimination, harassment, and providing reasonable accommodations to individuals with disabilities.

The Office of Equity's work primarily falls within four categories: report response, reasonable accommodations for employees with disabilities and pregnant employees, affirmative action planning, and training initiatives. In addition, representatives of the office provide proactive, advisory services to community members who wish to better understand the University's non-

¹ Prior to August 14, 2020, these prohibitions were contained in the University's Policy on Discrimination and Harassment and Policy on Sexual Misconduct.

discrimination policies or explore ways in which to support equal opportunity in their schools or units.

II. Report Response

The Office of Equity is responsible for responding to all reports of sexual misconduct, including sexual assault, sexual exploitation, stalking, dating and domestic violence, and sexual harassment. The Office of Equity is also responsible for responding to reports of discrimination and harassment based on race, color, religion, national origin, sex, pregnancy, sexual orientation, gender identity, gender expression, parental status, marital status, age, disability, citizenship status, veteran status, genetic information, or reproductive health decision making.²

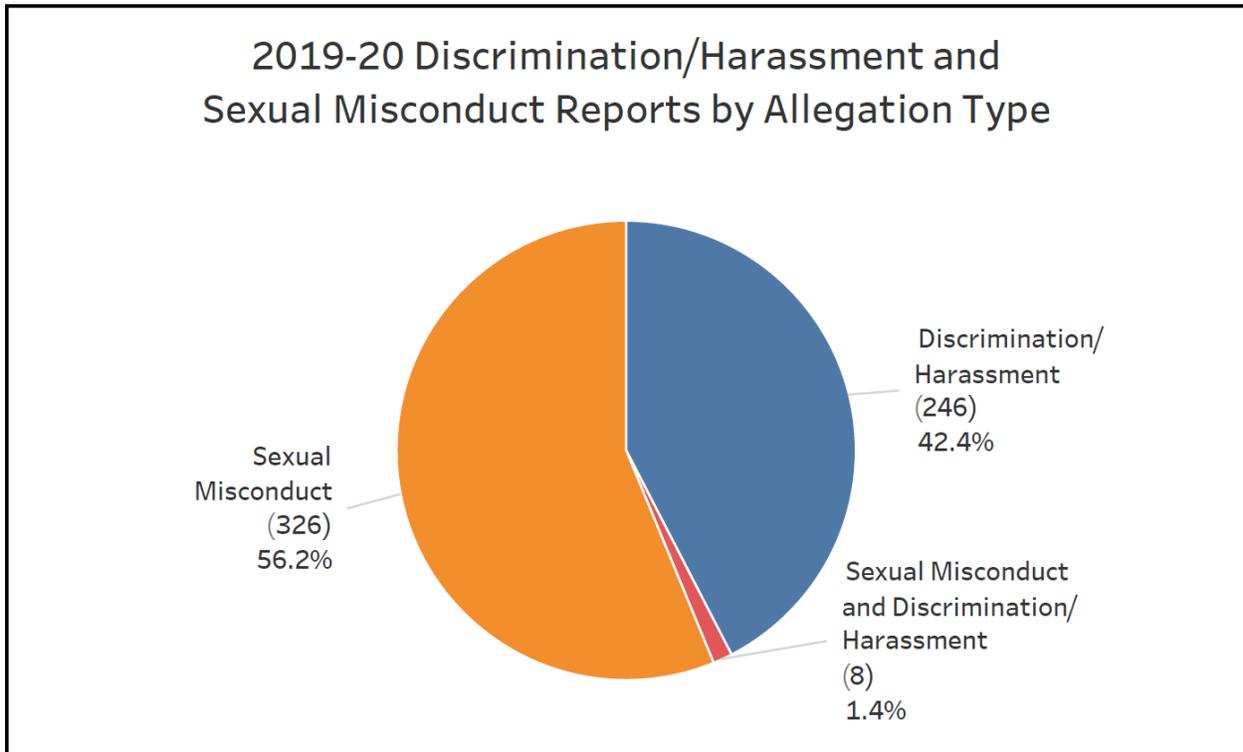
When an incident of alleged sexual misconduct, discrimination or harassment is reported to the University, whether it is reported in person, by email, electronically, anonymously, or through another person, the Office of Equity sends an outreach email to the potentially impacted person(s) to offer information and resources. One of the options that may be available to a person who may have experienced such is a University adjudication of whether a violation of the Interim Policy on Title IX Sexual Harassment or Policy on Institutional Equity occurred. Disciplinary action can be taken against any student, staff, or faculty member who is determined to have violated these policies. Northwestern's complaint resolution process for these matters can be found in Section III of the applicable policy.

The following charts present data on the number of sexual misconduct, discrimination, and harassment reports received by the Office of Equity, the nature of those reports, and their disposition during the academic year beginning September 1, 2019, and ending August 31, 2020.

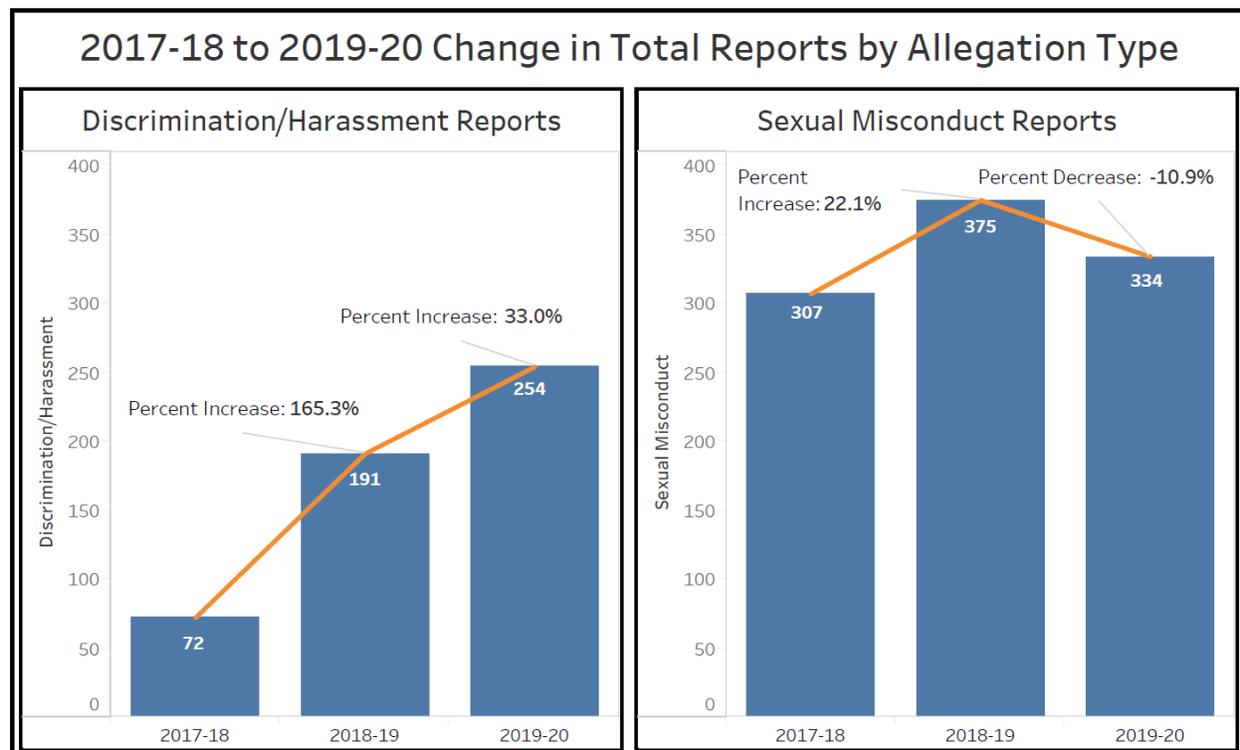
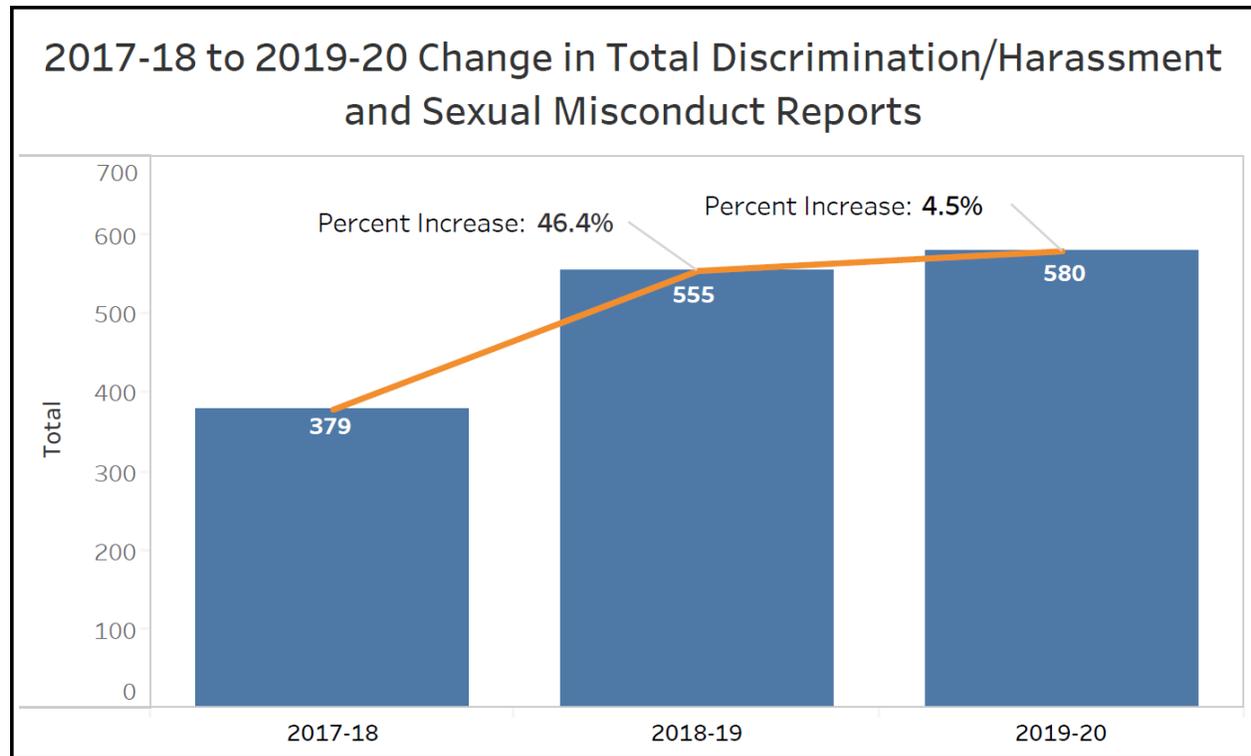
² Prior to August 14, 2020, matters involving allegations of discrimination and harassment committed by students were handled by the Office of Student Conduct.

A. Distribution of All Reports by Type of Allegation

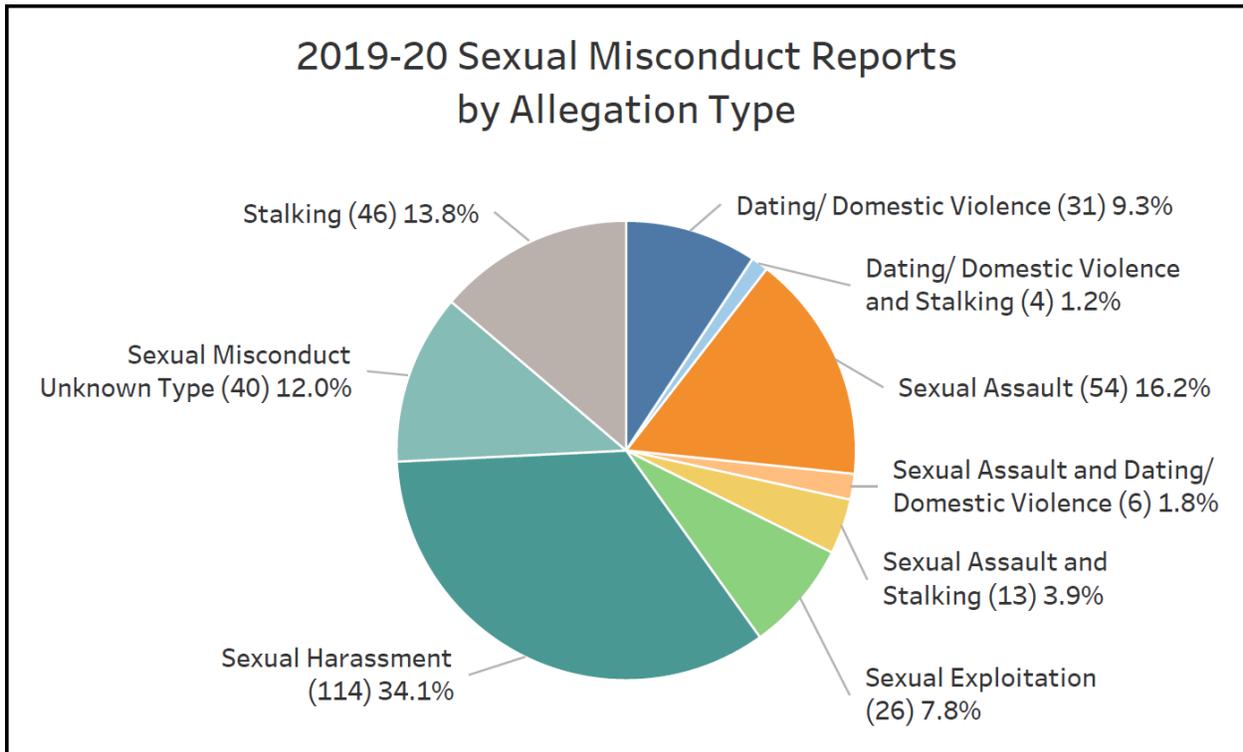
During the 2019-20 academic year, the Office of Equity received 580 reports. The following chart illustrates the distribution by type of allegation of the reports received by the Office of Equity.



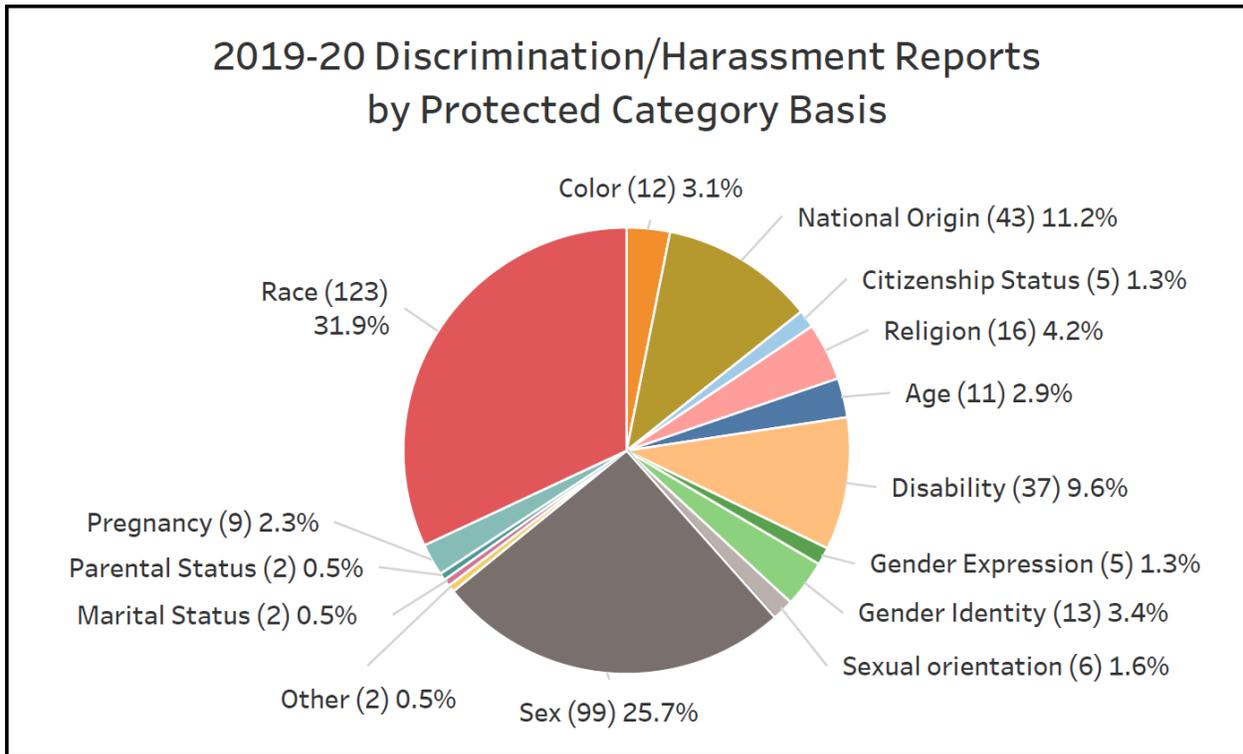
The Office of Equity saw an increase in reports from the 2017-18 and 2018-19 academic years to the 2019-2020 academic year. As the following charts represent, the overall number of reports increased by 183, from 379 in 2017-18, to 580 in 2019-2020. The number of discrimination and harassment reports increased by 182, from 72 in 2017-18, to 254 in 2019-2020. The number of sexual misconduct reports also increased from 307 to 334, an increase by 27 reports from 2017-2018 to 2019-2020.



The following chart illustrates the type of sexual misconduct allegations received in 2019-2020. Categories were added to reflect combined reports of sexual assault, dating/domestic violence, and stalking. When a report involved other combinations of sexual misconduct offenses (e.g. sexual assault and sexual harassment), it was categorized on the basis of the primary allegation.

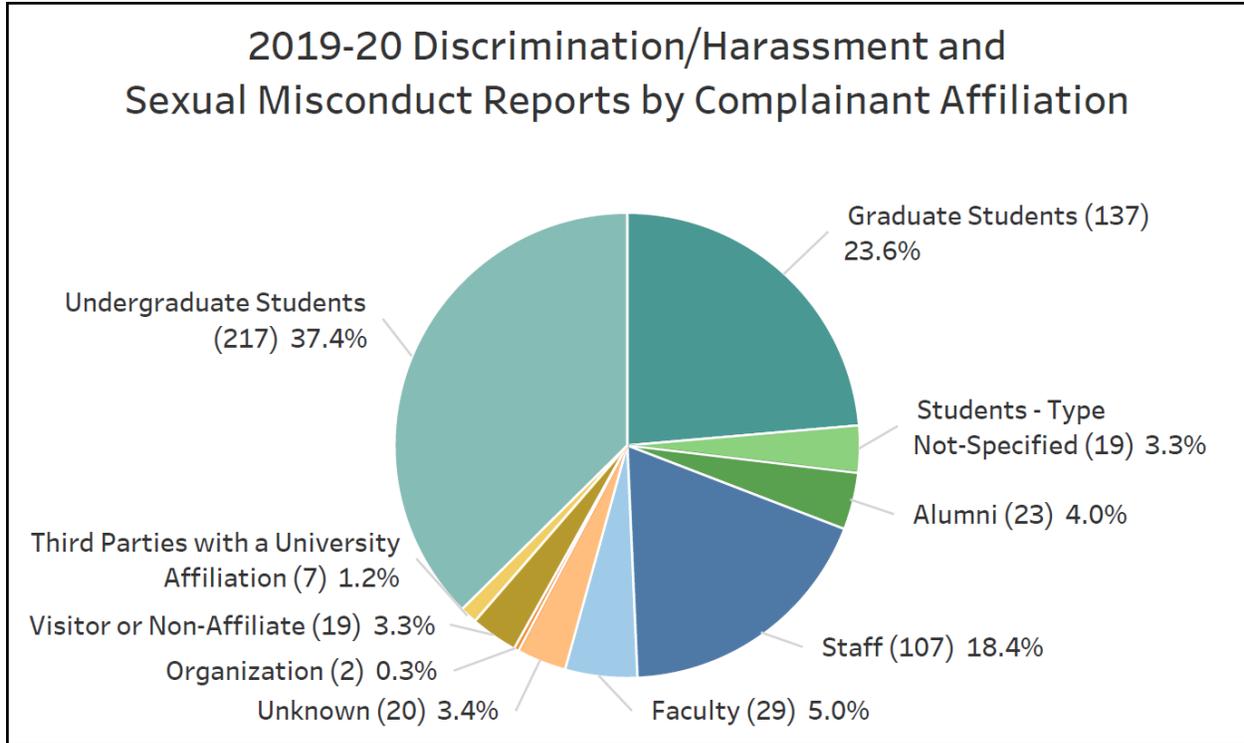


The following chart illustrated the basis for the 254 reports of discrimination and harassment. Note that each report could articulate one or more bases.



B. Distribution of Reports by Complainant Affiliation

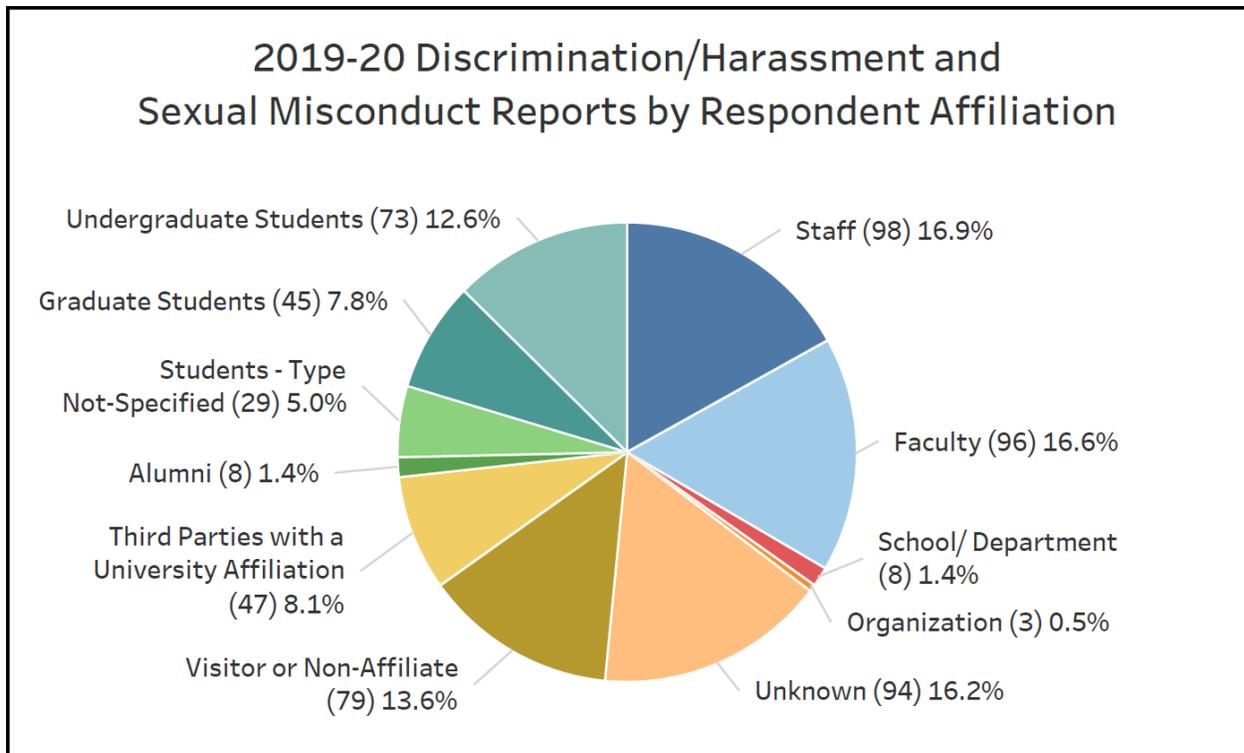
The following chart illustrates the complainant affiliation for each of the reports received by the Office of Equity during the 2019-2020 academic year. The complainant is the person who is alleged to have been impacted by the reported conduct. Of the 580 reports, 39 complainants (3.7%) either held no affiliation with Northwestern, or remained unidentified.³



³ When Northwestern receives reports from individuals who are unknown or unaffiliated, the Office of Equity evaluates the report to discern whether the described conduct impacts Northwestern's working or learning environments and to determine the appropriate response. An appropriate response may, but does not necessarily, include a formal investigation. In all reports in which a complainant can be identified, Northwestern offers support and resources to the impacted individual(s). In reports where a complainant cannot be identified, Northwestern may take steps within its control to eliminate, prevent, and address the reported conduct.

C. Distribution of Reports by Respondent Affiliation

The following chart illustrates the respondent affiliation for each of the reports received by the Office of Equity during the 2019-2020 academic year. The respondent is the person who is alleged to have engaged in discrimination, harassment or sexual misconduct. Of the 580 reports received, 173 (29.8%) of the reports were against people not affiliated with Northwestern or people whose identity was unknown. For example, this includes reports about behavior by unaffiliated dating/domestic partners as well as incidents occurring off campus by non-Northwestern community members.⁴

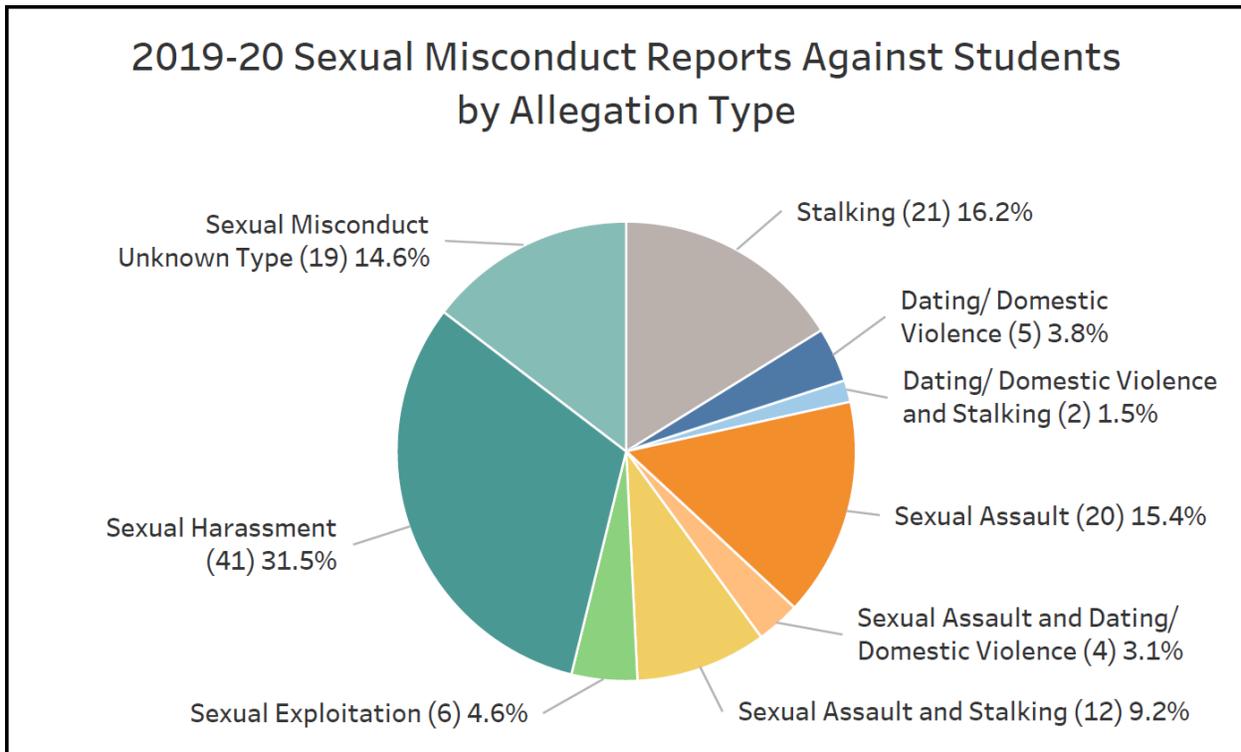


⁴ When Northwestern receives reports alleging misconduct by unidentified persons, or persons not affiliated with the University (and not otherwise connected to a University program or activity), support and resources are offered to the impacted individual(s) and other measures that may be needed to secure the safety of the community are taken; however, in most circumstances, the University will not conduct an investigation.

D. Reports Against Students

1. Distribution of Reports Involving Student Respondents by Category of Violation Alleged

Between September 1, 2019, and August 31, 2020, the Office of Equity received 130 reports alleging that Northwestern students engaged in sexual misconduct. Note: During the 2019-20 academic year, reports alleging that Northwestern students engaged in violations of the Policy on Discrimination and Harassment were handled by the Office of Student Conduct and are not included in this report.

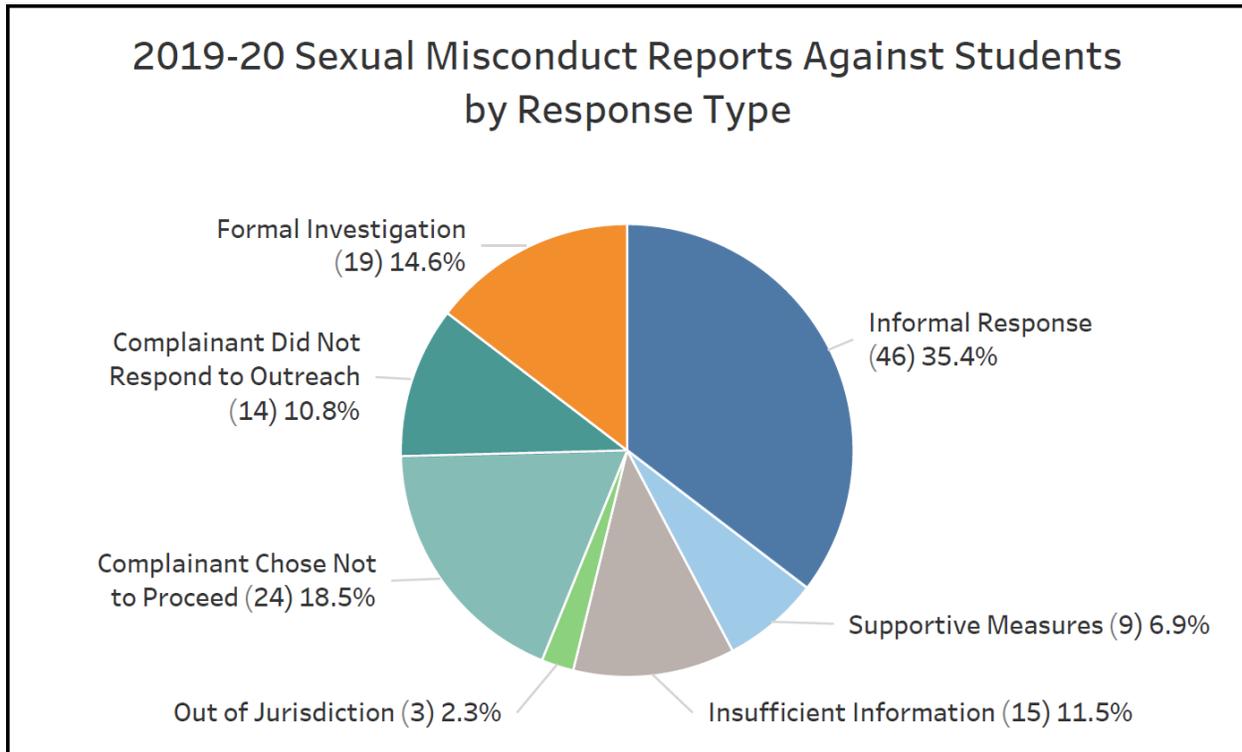


2. How Complainants Elected to Proceed

When a report is received from any source, including directly from impacted individuals and indirectly through others, the Office of Equity reaches out to the individual(s) who may have experienced misconduct to make them aware of the options and resources available to them. In cases where an individual reporting misconduct requests anonymity or does not wish to proceed with an investigation, the Office of Equity will attempt to honor that request but, in some cases, the Office of Equity may determine that it needs to proceed with an investigation. In such cases, the Office of Equity will not compel an individual to participate. Individuals impacted by sexual misconduct may request supportive measures from the Office of Equity even if they do not choose to participate in the University's Complaint Resolution Process.

The following chart illustrates how the 130 reports of sexual misconduct against students were handled. In cases where a complainant wished to proceed with adjudication of a complaint against a student and there was reasonable information to suggest a policy violation may have occurred, the case was handled through **formal resolution**, which involved investigation and, in some cases, a sanctioning panel. In some cases where formal resolution was not desired by the complainant or when there was not enough information to proceed with formal resolution, **informal action** was used as a way to prevent the recurrence of sexual misconduct and remediate its impact. Informal

action does not result in findings related to responsibility, or in sanctions. For example, informal action may have included no-contact directives or educational or advisory meetings with respondents.



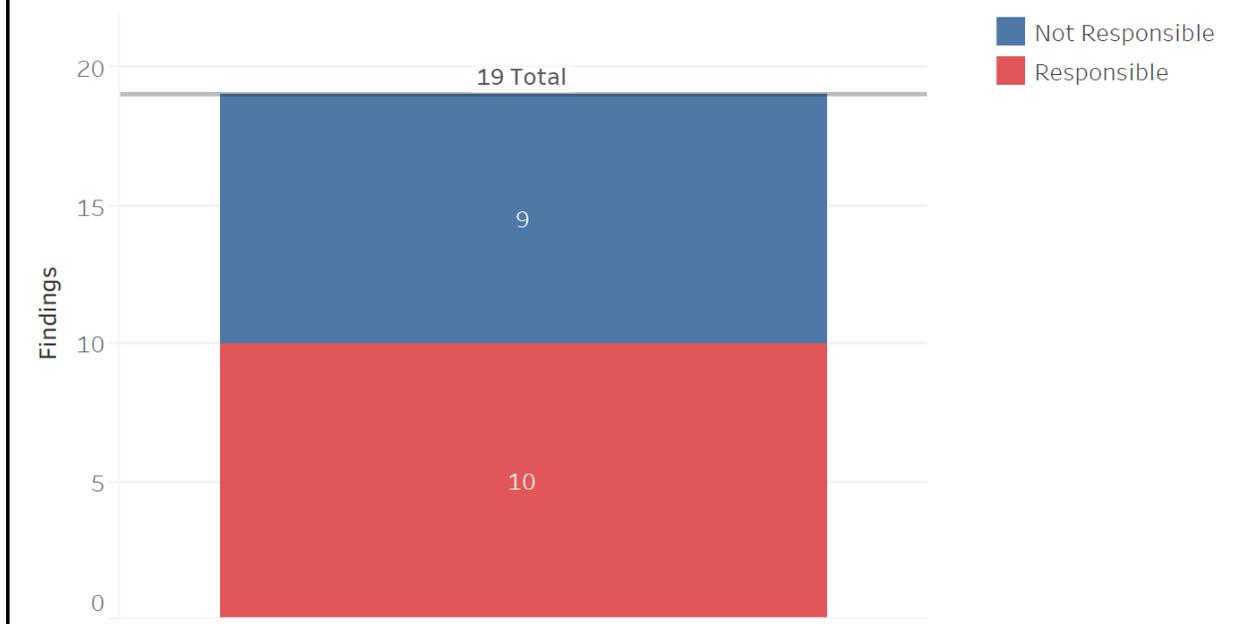
3. Outcomes in Adjudicated Student Cases

In student matters, cases that did not have the potential to result in separation from the University were investigated and resolved by the Office of Equity using an administrative process. Cases that had the potential to result in separation from the University, including suspension or expulsion, were investigated by the Office of Equity; in cases where a policy violation was found, the matter was resolved by *a sanctioning panel* facilitated by the Office of Student Conduct.

The following chart illustrates adjudication outcomes in the 19 student cases that proceeded through the formal resolution process during the 2019-2020 academic year.⁵

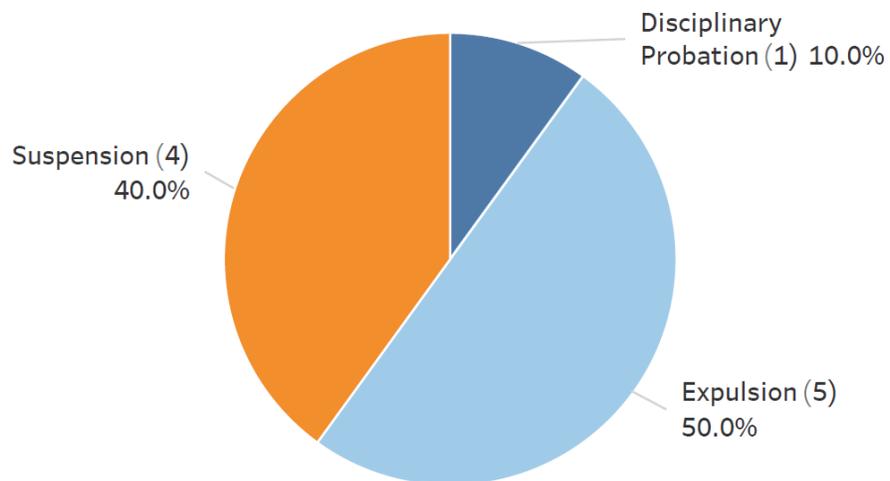
⁵ In cases where a student was alleged to have violated multiple categories of the Policy on Sexual Misconduct, or to have acted against multiple complainants, the outcome is listed as “Not Responsible” only when the student was found Not Responsible for *all* sexual misconduct allegations against *all* complainants.

2019-20 Findings in Sexual Misconduct Reports Against Students That Proceeded Through Formal Investigation



Some cases resulted in multiple sanctions for a respondent (e.g. probation and educational sanction). The most severe sanction each respondent received is reflected in this chart.

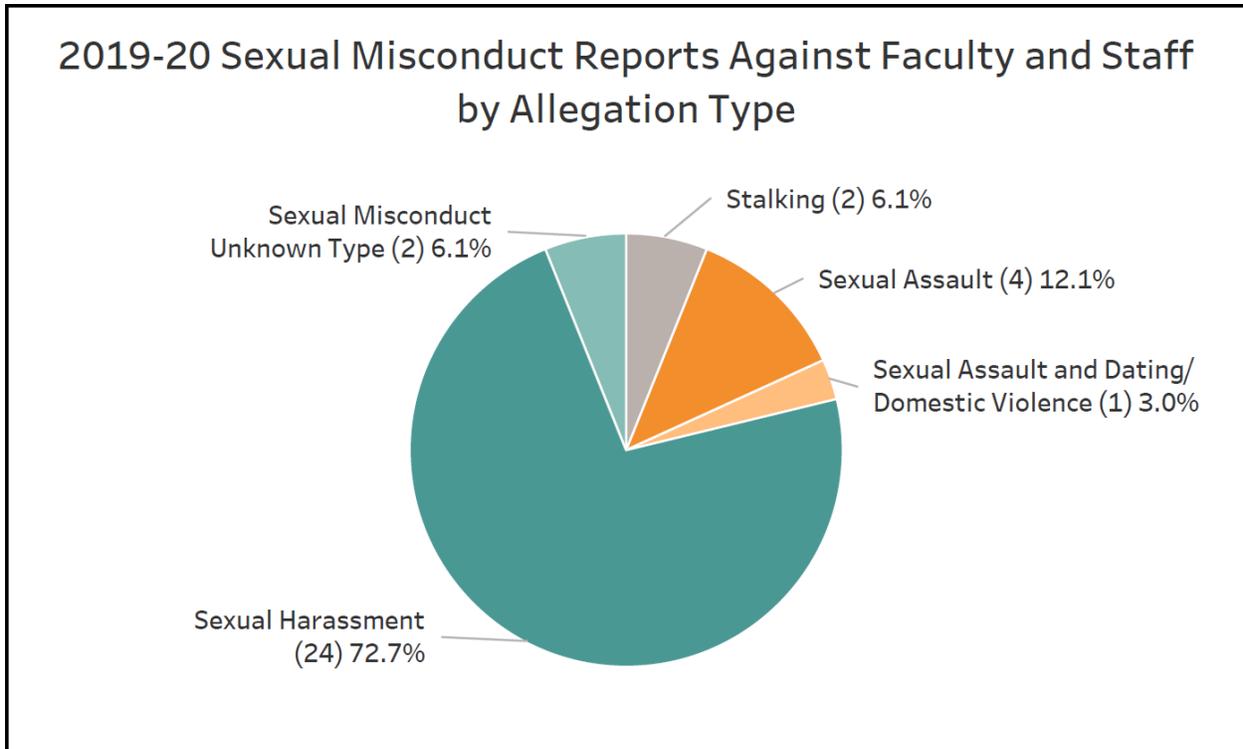
2019-20 Outcomes in Sexual Misconduct Reports Against Students with Responsible Findings



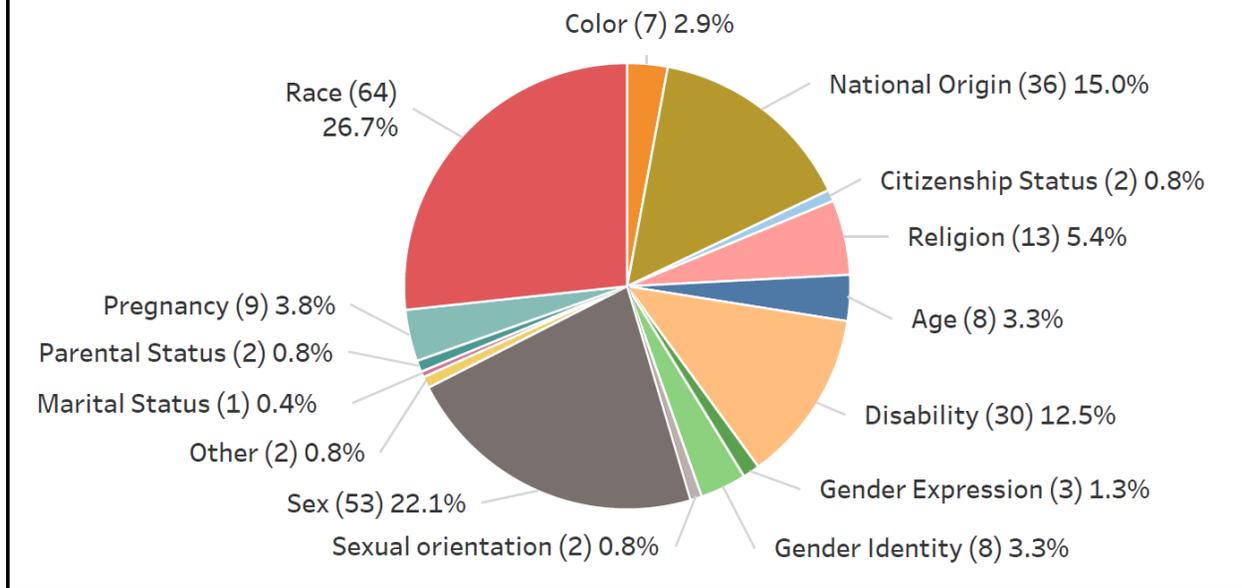
E. Reports Against Faculty and Staff

1. Distribution of Reports Involving Faculty and Staff Respondents by Category of Violation Alleged

During the 2019-2020 academic year, the Office of Equity received 194 reports involving faculty or staff respondents. 33 of these reports included allegations of sexual misconduct and 162 reports included allegations of discrimination and harassment (1 report included allegations of both sexual misconduct and discrimination and harassment and are thereby reflected in both charts). The following charts illustrate the types of allegations that were reported. Please note that discrimination and harassment reports could articulate more than one basis.



2019-20 Discrimination/Harassment Reports Against Faculty and Staff by Basis

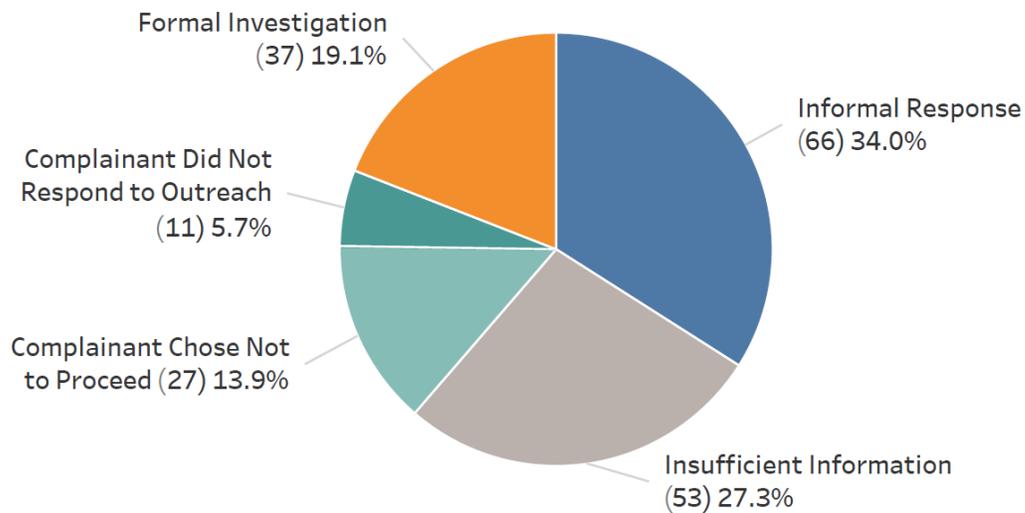


2. How Complainants Elected to Proceed

As described above, when the Office of Equity receives a report from any source, including directly from impacted individuals and indirectly through others, the Office of Equity reaches out to the individual(s) who may have experienced misconduct to make them aware of their options and the resources that are available to them. In cases where an individual reporting misconduct requests anonymity or does not wish to proceed with an investigation, the Office of Equity will attempt to honor that request but, in some cases, the Office of Equity may determine that it needs to proceed with an investigation. In such cases, the Office of Equity will not compel an individual to participate.

The following chart illustrates how reports of sexual misconduct, discrimination and harassment against faculty and staff were handled. In cases where a complainant wished to proceed with adjudication of a complaint against a faculty or staff member, and there was reasonable information to suggest a policy violation may have occurred, the case was handled through **formal resolution**, which involved an investigation. In some cases where formal resolution was not desired by the complainant or when there was not enough information to proceed with formal resolution, **informal action** was used as a way to prevent the recurrence of discrimination, harassment, or sexual misconduct and remediate its impact. Informal action does not result in findings related to responsibility, or in sanctions. For example, informal action may have included educational or advisory meetings with respondents, or educational programming for departments or units.

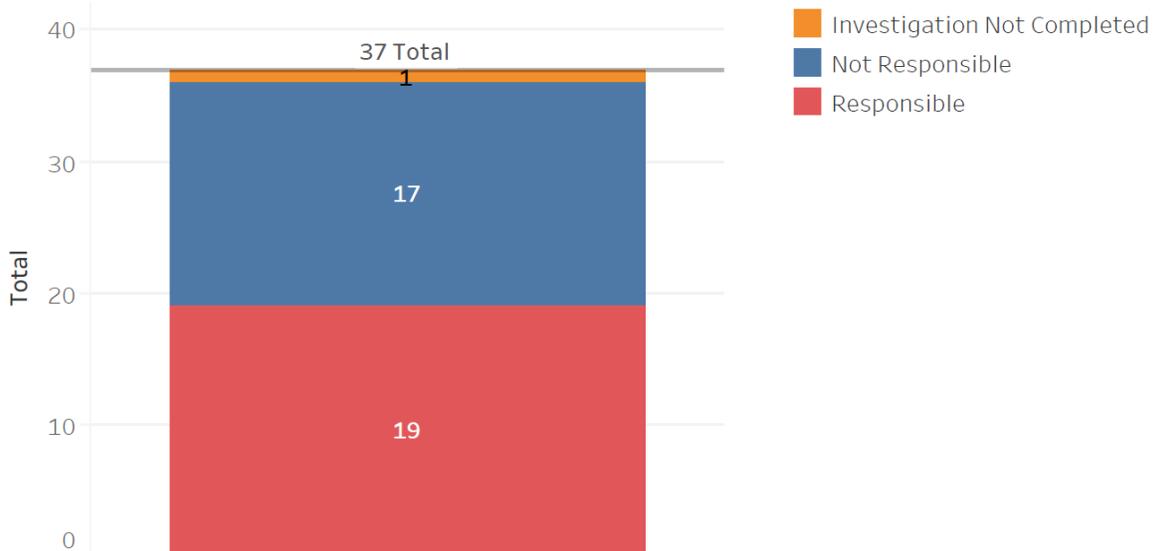
2019-20 Discrimination/Harassment and Sexual Misconduct Reports Against Faculty and Staff by Response Type



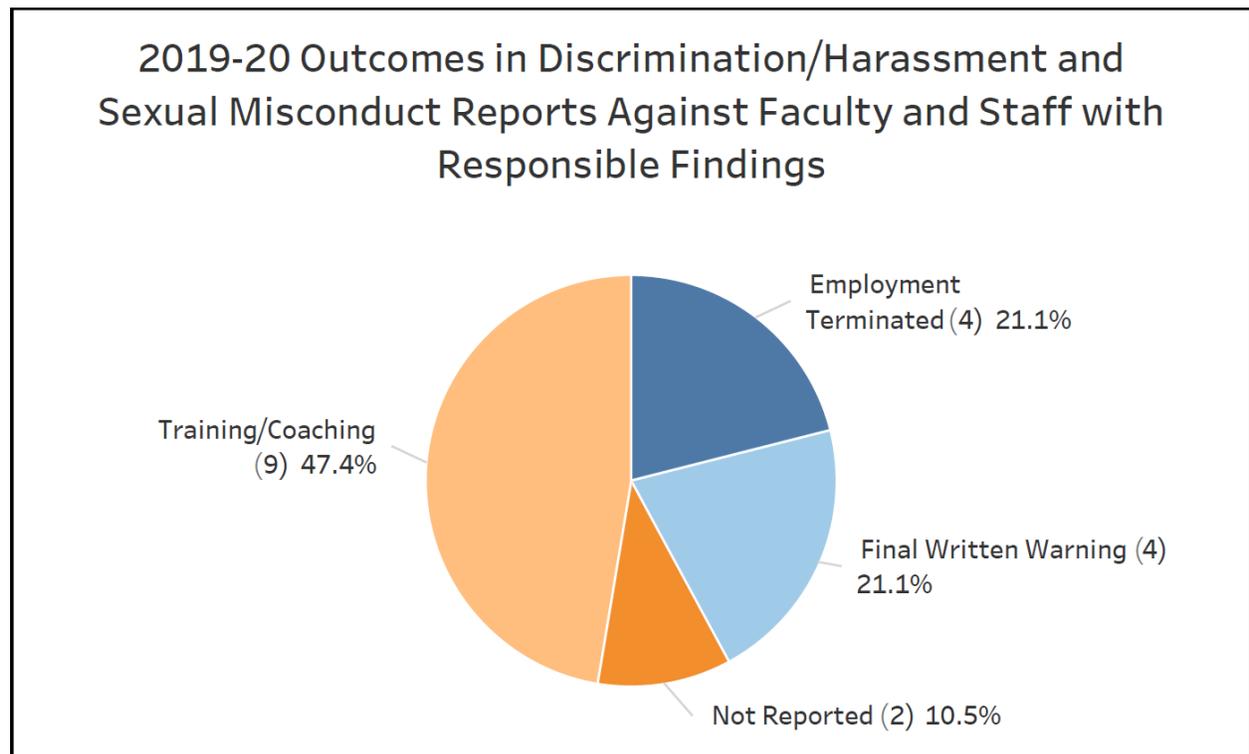
3. Outcomes in Adjudicated Faculty/Staff Cases

The following charts illustrate the findings and outcomes of the 37 reports against faculty and staff that were formally resolved through investigation during the 2019-2020 academic year.

2019-20 Findings in Discrimination/Harassment and Sexual Misconduct Reports Against Faculty and Staff That Proceeded Through Formal Investigation



In matters where a policy violation is found, disciplinary consequences are imposed by the applicable academic department or administrative unit. For staff respondents, the Office of Equity provides findings of a policy violation to the Office of Human Resources and the respondent's supervisor(s), who are responsible for deciding what sanctions or corrective actions should be imposed on the respondent, in accordance with the procedures set forth in the Staff Handbook. For faculty respondents, the Office of Equity makes a recommendation regarding whether the policy violation warrants considering termination or suspension. The report and the recommendation are sent by the Office of Equity to the faculty member's department chair and/or dean, and the Associate Provost for Faculty. Sanctions or corrective actions are determined in accordance with the procedures set forth in the Faculty Handbook.



III. Reasonable accommodations for employees with disabilities and pregnant employees

The Office of Equity works with faculty, staff and job applicants with disabilities to provide reasonable accommodations. The Office of Equity also provides religious accommodations for faculty and staff as well as pregnancy accommodations for faculty, staff, and students. Information and FAQs regarding the reasonable accommodation process administered by the Office of Equity are available at: <https://www.northwestern.edu/equity/policies-procedures/accommodation/index.html>. The Office of Equity also reviews accessibility issues reported by the Northwestern community and visitors. The University supports students with disabilities through AccessibleNU, which is part of the Division of Student Affairs.

When the University instituted its Covid-19 response plan in March 2020, the Office of Equity quickly pivoted to provide accommodations to faculty and staff whose underlying conditions increased their risk from Covid-19 exposure. The Office of Equity also coordinated with Risk Management, OGC, and AccessibleNU to ensure consistent consideration of accessibility in the face of a rapidly-evolving pandemic situation.

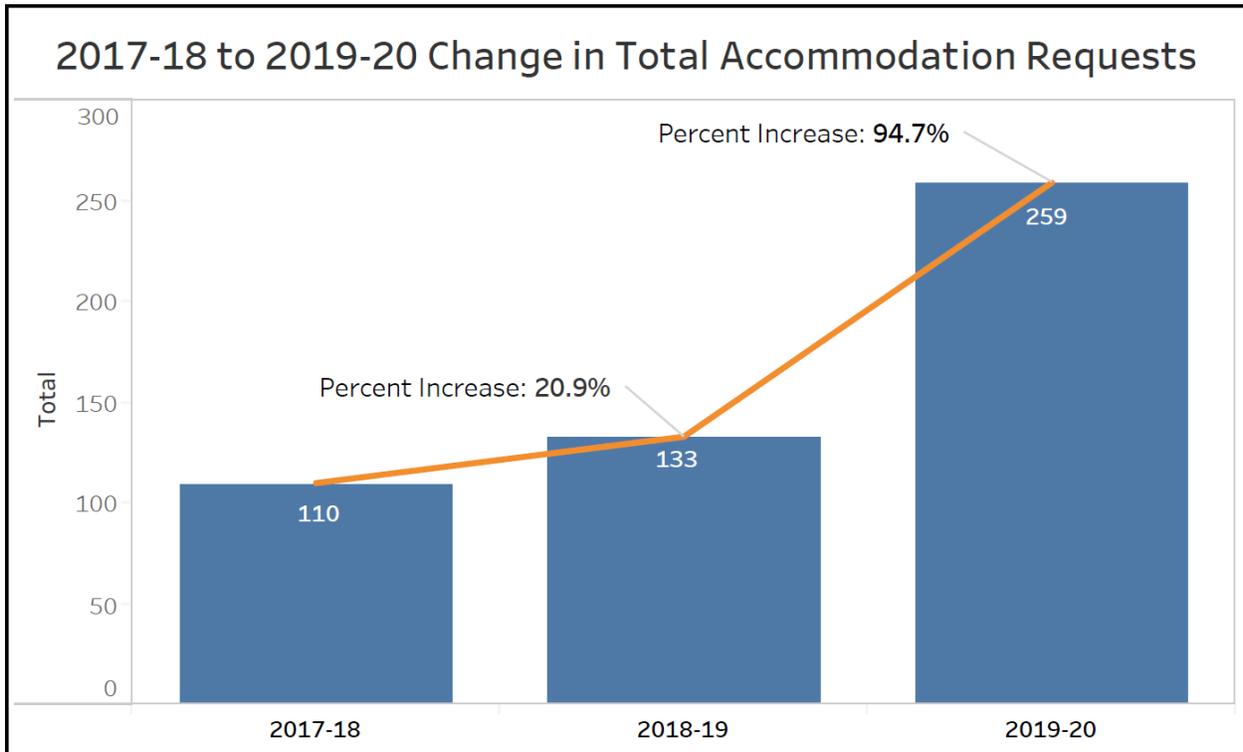
During the 2019-20 academic year, as part of an ongoing effort to ensure a physically accessible campus, the Office of Equity partnered with Risk Management on building inspections. OE recommended the inclusion of specific Americans With Disabilities Act (ADA) requirements in Risk Management's building inspection checklists, to facilitate corrections of common physical access issues in a timely manner (e.g. malfunctioning power openers).

The Office of Equity also took a number of steps to ensure accessibility in Northwestern's digital landscape. The Office of Equity continued its work on the Digital Accessibility Steering Committee (DASC) to obtain, develop and promote a number of resources for the Northwestern community. Those resources include the purchase of SensusAccess, a software that makes it easy for University community members to convert electronic documents to accessible formats; initiation of the Digital Liaison program, to increase in-house knowledge of and implementation of digital accessibility requirements; and enhancements to the University's Accessibility website, which provides a central location where community members and visitors can find resources and report accessibility issues. The Accessibility website is regularly updated with new resources and served as a valuable source of information for staff and faculty shifting to remote operations.

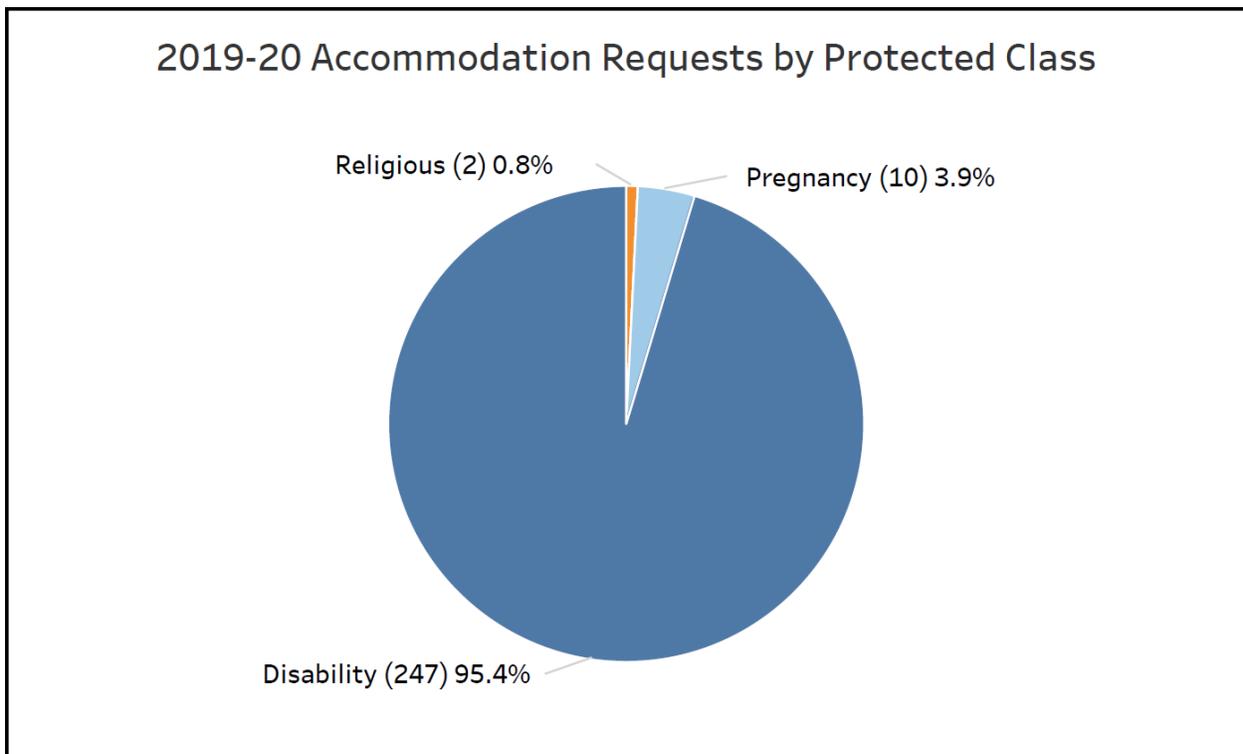
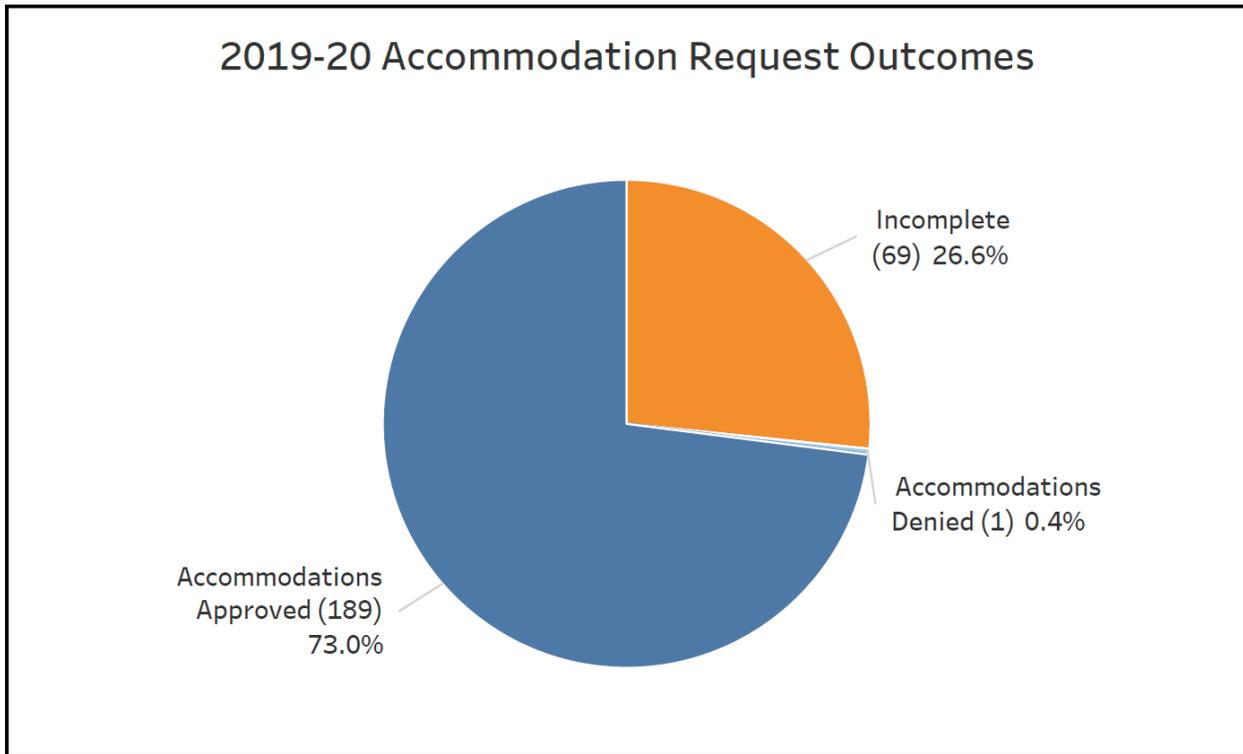
A. Overview of Accommodation Requests

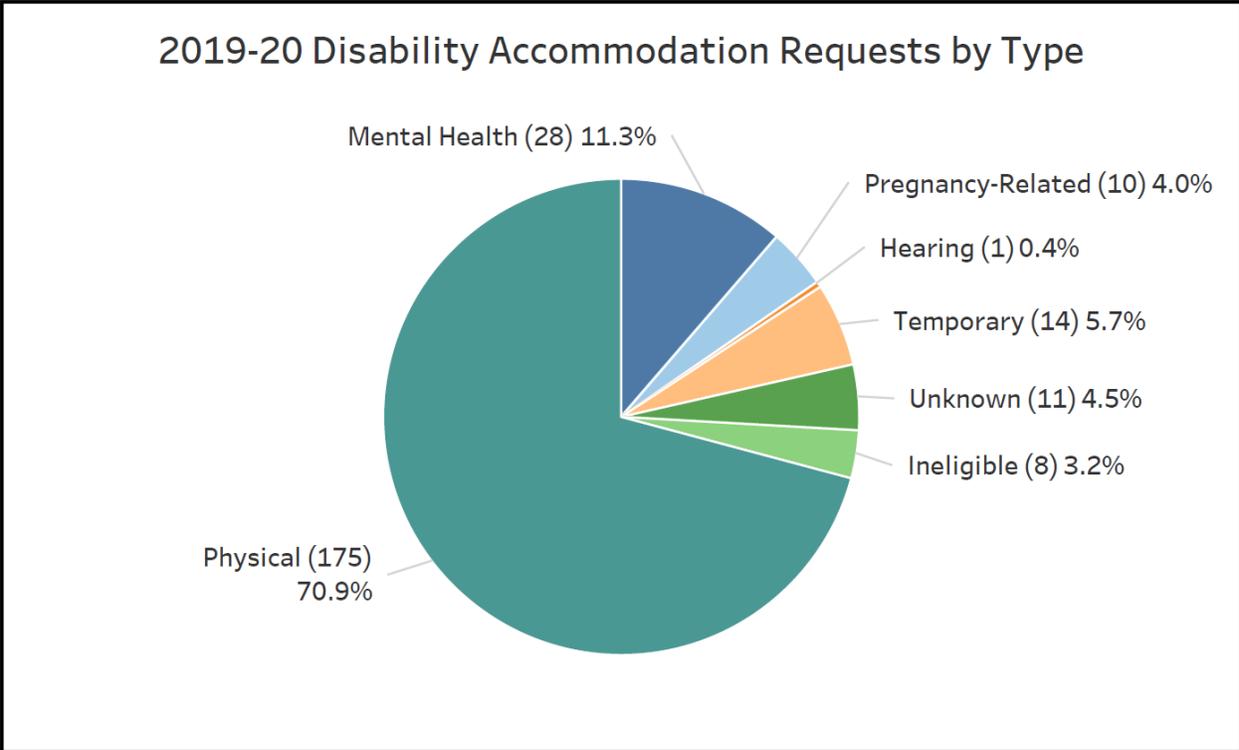
During the 2019-2020 fiscal year, the Office of Equity received 259 requests for workplace accommodations, including 247 requests for disability accommodations. This number includes new accommodation requests, alternative accommodations, extension requests, and adjustments to existing accommodations. When the Office of Equity receives a request for a workplace accommodation, the Office engages in an interactive process with the requestor of the accommodation. That interactive process involves consultation with the requestor, the requestor's health care providers, and relevant University departments (such as Parking, Facilities, etc.). The Office of Equity seeks to implement the requestor's preferred accommodations when possible. In some cases when the preferred accommodation may not be an option, the Office of Equity engages with all parties to identify effective alternative accommodations. Denial of accommodation requests is a rare occurrence because the interactive process succeeds in identifying reasonable

accommodations in most cases. The following charts illustrate the outcomes of these requests and the types of medical conditions accommodated.



The following charts illustrate the outcomes of these requests and the types of medical conditions accommodated.





Accommodations related to the above conditions vary based on the impact of the condition on the individual who is seeking an accommodation. The accommodations approved in the 2019-2020 fiscal year included (among many others):

- Ergonomic equipment for individuals with chronic musculoskeletal conditions and sciatica;
- Provision of Communication Access Realtime Translation (CART) captioning services and clear face masks for deaf and hard-of-hearing employees;
- Mics, keyboards, and text-to-speech software to facilitate remote teaching and work;
- Temporary reserved parking spots due to broken bones and to reduce Covid-19 exposure;
- Remote work due to underlying medical conditions that increase Covid-19 risk; and
- Flexible scheduling to attend medical appointments and treatment programs, and to reduce Covid-19 exposure.

IV. Affirmative Action Planning

The Office of Equity is responsible for developing the University’s annual Affirmative Action Plan for Women and Minorities and the Affirmative Action Plan for Individuals with Disabilities and Protected Veterans (collectively referred to as “AAPs”), which provides a comprehensive analysis of the diversity of the University’s workforce. The affirmative action program is designed to help the University identify areas in which progress can be made, recognize areas in which progress has been made, and assist Northwestern in its continued efforts to develop initiatives that foster a diverse and inclusive community.

During the 2019-20 academic year, the Office of Equity worked with the HR Talent Acquisition office, the HR Support, Process & Analytics office, and the Faculty Operations office to

implement and refine processes for the flow of data and information stemming from diversity data requests from across the University. Focus was placed on establishing processes for working with recruiters and search committees for the analysis of data as it relates to AAP requirements for focusing outreach and recruitment efforts. These efforts are essential to the AAP component designed to increase the diversity of applicant pools in areas of underutilization at the University.

As part of efforts to refine the flow of data, a major project was undertaken to assign and update job grouping classification codes in the myHR system corresponding to AAP job groupings. These efforts focused this year on the system job group assignments for the almost 2000 unique active job titles currently utilized for faculty and staff positions, and will continue into the current year to assign and update the data for all 7000 unique job titles listed in the myHR system. Having this data set updated in the system was an essential component to integrating the information into Talent Acquisition's regular reporting structure as part of their strategic planning in the recruiting process for open positions.

The process for coordination information related to recruiting data requests was also streamlined in this past academic year with the establishment of Talent Acquisition's dedicated Lead Diversity Equity and Inclusion Partner role, as well as three additional TA Partner roles which received training through diversity recruiter certification programs. Discussions with Talent Acquisition were also implemented to begin work on establishing data sets for more accurately tracking applicant sourcing. These discussions are part of an ongoing effort to establish ways for monitoring the effectiveness of outreach and recruiting efforts with specific recruiting organizations.

Similarly, requests for data related to faculty recruiting are now being coordinated through the Faculty Operations office to ensure a smooth process involving the appropriate stakeholders and accurate data from the now established Faculty Recruiting System (FRS). With FRS in its third year of implementation, the Office of Equity was targeted this year to participate in the Faculty Operations review of the system to ensure the accuracy of data as it flows through the recruitment stages and into the myHR database. Work with the Faculty Operations team will continue this year to provide utilization/availability reporting to search committees as part of the annual faculty hiring planning process.

Training Initiatives

During academic year 2019-2020, the Office of Equity provided live training, either in-person or virtual, to 8,134 people. These trainings were primarily provided by Kate Harrington-Rosen, Director, Equity Outreach and Education and Shá Norman, Equity Outreach and Education Coordinator, with support from other members of the Office of Equity as well, notably Ish Orkar, Senior Equity Specialist, and Laura Conway, ADA Coordinator. Many trainings were provided in partnership with other units and student groups, including the Center for Awareness, Response, and Education (CARE), Associated Student Government (ASG), Well-being, Engagement, Learning and Leadership (WELL), the Women's Center, and the Office of the Provost. These trainings reached the following populations:

- Students: 5,029
- Staff: 1,832
- Faculty: 588

- Third parties: 685

The Office also reached a total of 5,900 people through in-person and virtual resource fairs and tabling events, which includes 4,750 students and 1,150 faculty/staff.

Training and outreach of note included:

- In response to the Covid-19 pandemic, the Office of Equity partnered with the Well-being, Engagement, Learning and Leadership (WELL) team in HR and the Women's Center to provide a monthly dialogue series for staff entitled Caring for Ourselves and Others While We Navigate Change. Starting in April 2020, this series provided valuable space for hundreds of staff members to come together, share resources, and build community.
- In Fall 2019 the Office of Equity toured campus, meeting with various student, staff, and faculty groups to share the results of the April 2019 Campus Climate Survey on Sexual Assault and Misconduct, offered a number of open listening sessions for community members, and tabled around campus to share information and answer community questions.
- In Fall 2019 the Office of Equity partnered with the graduate student group Women in Science, Engineering, and Research (WISER) to offer the Resource Navigator program, through which volunteer graduate students receive extensive training from the Office of Equity and the Center for Awareness, Response, and Education, in order to serve as liaisons back to the Office of Equity by providing department-level, on-the-ground information and resources to fellow students.
- In Winter 2019, the Office of Equity launched a pilot version of the Equity Series, a 6-month foundational training program designed for teams, units, and departments that are ready to engage in long-term dialogue and change work to shift their norms and practices towards equity. Series topics may include: power, privilege, and oppression: building a common language; understanding implicit bias; tools for interrupting harm; and action planning for justice and inclusivity. Health Professions Advising, a staff unit, completed the pilot in July 2020.
- With the advent of the Covid-19 pandemic, in March 2020 the Office of Equity pivoted all trainings to live, synchronous online sessions.
- In Spring 2020, staff from the Office of Equity worked with partners in the Well-being, Engagement, Learning and Leadership (WELL) to offer live, virtual Unconscious Bias trainings.
- In June 2020, the Northwestern Alumni Association hosted Kate Harrington-Rosen for a live webinar on Becoming an Active Bystander: A Framework and Tools for Interrupting Harm. The webinar was their most widely attended online event ever, reaching 480 people live.
- Fall 2019: McCormick faculty; all Compass employees; NU Marching Band; new football players; new TAs; new Medill part-time graduate students; all Facilities leads and staff; all IT staff; Art History faculty; The Family Institute Faculty; all Center for Comparative Medicine staff.
- Winter 2019: All Department of Athletics and Recreation staff; Medill faculty; German faculty; Prosthetics and Orthotics graduate students; all ASG-funded student groups.

- Spring 2020: Performance Studies faculty; Earth and Planetary Sciences graduate students, faculty, and postdocs; Fraternity and Sorority Life Risk Managers (undergraduate students); Mesulam Institute staff (Feinberg); Pathology faculty (Feinberg); Acting faculty.
- Summer 2020: New York Alumni Relations staff; Faculty Teaching Practicum; all NU-Qatar students, faculty, and staff; Driskil graduate students; Radio, TV, Film faculty.

Additionally, the Office of Equity provided online, asynchronous sexual misconduct prevention training to 10,208 members of the community:

- Students: 6,808
- Staff and Faculty: 3,400