

October 25, 2022

## **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 Institutional Equity (Attachment A) 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 an Interim Policy on Title IX Sexual Harassment. (Attachment B) 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 Equity reaches out to the potentially impacted person(s) to offer information and resources, including our resource guides on sexual misconduct. (Attachment C)

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.<sup>1</sup> Northwestern's Policy on Institutional Equity and Interim Policy on Title IX Sexual Harassment apply to both of these campuses. The University's Office of Equity 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 of sexual misconduct occurring within Clery geography or those reported without a known location.<sup>2</sup>

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<sup>1</sup> In addition to the geographic size difference between our Chicago and Evanston campuses, there are no residential facilities on the Chicago campus.

<sup>2</sup> 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

## **Part A.**

Please find Northwestern's policies and concise, written notification of a survivor's rights and options attached. (Attachments A, B, and C)

## **Part B.**

### **I. Campus Training, Education and Awareness**

Please see the attached spreadsheets (Attachment D) which detail campus trainings intended to prevent sexual violence that were provided to students in 2021.

### **II. Reports**

- From January 1, 2021 – December 31, 2021, the Title IX Coordinator/responsible employees received 36 reports of sexual violence (reports of sexual penetration without consent or sexual contact without consent under Northwestern's Policy on Institutional Equity, or reports of Title IX sexual assault under Northwestern's Interim 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, 29 were made on the Evanston campus, while 7 reports were made on the Chicago campus.
- From January 1, 2021 – December 31, 2021, the Title IX Coordinator/responsible employees received 9 reports of dating/domestic violence (under either Northwestern's Policy on Institutional Equity, or Northwestern's Interim 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. 7 of these reports were made on the Evanston campus, while 2 reports were made on the Chicago campus.
- From January 1, 2021 – December 31, 2021, the Title IX Coordinator/responsible employees received 30 reports of stalking (under either Northwestern's Policy on Institutional Equity, or Northwestern's Interim 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. 24 of these reports were made on the Evanston campus, while 6 were made on the Chicago campus.

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, 2021 – December 31, 2021, consistent with any applicable professional privilege. Northwestern's confidential resources provided aggregate data for reports from students in 2021 reflecting the receipt of 116 reports of sexual violence, 83 reports of dating/domestic violence, and 35 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.

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concerns reported by or on behalf of students and includes reports made to confidential resources.

## **A. 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 36 reports of sexual violence (reports of sexual penetration without consent or sexual contact without consent under Northwestern's Policy on Institutional Equity, or reports of sexual assault under Northwestern's Interim Policy on Title IX Sexual Harassment) received by the Title IX Coordinator or responsible employees, 16 students did not respond to outreach and follow up; 14 students responded and requested not to proceed with the complaint resolution process, and 3 reports listed an anonymous student as the complainant. 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. Of these 33 reports, 26 came from the Evanston campus, while 7 reports came from the Chicago campus. The University formally investigated 3 reports of sexual violence (and resolved 1 of them during the 2021 calendar year) under its complaint resolution process. All of these reports came from the Evanston campus.
- Of the 9 reports of dating/domestic violence received by the Title IX Coordinator or responsible employees, 3 students did not respond to outreach and follow up; 3 students responded and requested not to proceed with the complaint resolution process, and one report listed an anonymous student as the complainant. 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. 5 of these reports came from the Evanston campus, and 2 came from the Chicago campus. 1 student received a referral to the Northwestern University Police Department (NUPD); that report came from the Evanston campus. The University formally investigated (but did not resolve by the end of the 2021 calendar year) 1 report of dating/domestic violence under its complaint resolution process. That report came from the Evanston campus.
- Of the 30 reports of stalking received by the Title IX Coordinator or responsible employees, 10 students did not respond to outreach and follow up; 18 students responded and requested not to proceed with the complaint resolution process. 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. 12 of the reports came from the Evanston campus, while 6 came from the Chicago campus. 1 student received a referral to the Northwestern University Police Department (NUPD); that report came from the Evanston campus. The University formally investigated (but did not resolve by the end of the 2021 calendar year) 1 report of stalking under its complaint resolution process. That report came from the Evanston campus.

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.

## **B. Complaint Resolution Procedure Outcomes**

- Of the 3 reports of sexual violence received in 2021 that went through the University's complaint resolution process, 1 investigation was completed and resolved in 2021. In this matter, the respondent was found not responsible. This report came from the Evanston campus.
- The University received 1 report of dating or domestic violence in 2021 for which an investigation was opened. However, that investigation was not resolved in 2021. This report came from the Evanston campus.
- The University received 1 report of stalking in 2021 for which an investigation was opened. However, that investigation was not resolved in 2021. This report came from the Evanston campus. Additionally, 1 report of stalking received in 2020 was resolved through the complaint resolution process in 2021. In that matter, 1 respondent was found not responsible. This report came from the Evanston campus.

## **Part C.**

Additional information about Northwestern's response to sexual misconduct can be found on our website at: [www.northwestern.edu/sexual-misconduct](http://www.northwestern.edu/sexual-misconduct). Questions or concerns can be directed to Northwestern's Interim Title IX Coordinator, Jessica Galanos, at [Jessica.galanos@northwestern.edu](mailto:Jessica.galanos@northwestern.edu).

Attachment A:

Northwestern's Policy on Institutional Equity



Northwestern University

Approving University Officials: Provost; Executive Vice President

Responsible Office: Provost; Human Resources; Student Affairs; Office of Equity

Effective Date: September 7, 2022

Next Review Date: September 1, 2023

POLICY ON INSTITUTIONAL EQUITY

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## **I. Policy**

### **A. Policy Statement**

Northwestern 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 (referred to as “protected classes”) in matters of admissions, employment, housing, or services, or in the educational programs or activities Northwestern operates. Prohibited discrimination based on sex includes sexual misconduct, including but not limited to, sexual harassment, sexual assault, sexual exploitation, stalking, and dating or domestic violence. Such conduct violates Northwestern’s values and disrupts the living, learning, and working environment for students, faculty, staff, and other community members.

Pursuant to the Department of Education’s 2020 regulations implementing Title IX, the University has adopted an [Interim Policy on Title IX Sexual Harassment](#), which governs certain instances of sexual misconduct. 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. Other forms of misconduct not covered by this policy or the Interim Policy on Title IX Sexual Harassment may be addressed by other Northwestern policies (e.g. Student Handbook, Faculty Handbook, and Staff Handbook).

The 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, volunteers, interns, and third parties.

### **B. Jurisdiction**

The Office of Equity oversees the University’s response to reports of discrimination and harassment, including sexual misconduct, as described below.

Northwestern may investigate any reported 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 the reported conduct occurred on or off campus. Reports of violations of other University policies will be referred to the appropriate office.

For every report, the Office of Equity will review the circumstances of the reported conduct to determine the following:

- Whether the University has jurisdiction over the parties involved;
- Which University policy is applicable to the parties and the conduct being reported; and
- The actions within the University’s control necessary to eliminate, prevent, and address the reported conduct. (Note: In circumstances where the Office of Equity finds a violation of policy, the Office refers the matter to the appropriate body/office for sanctioning as described in Section III(E))

Specific conduct covered by the Title IX Regulations on Sexual Harassment is governed by the University’s Interim Policy on Title IX Sexual Harassment and will be addressed according to the

processes stated therein. All other forms of sex-based discrimination are governed by this Policy, including sexual harassment, as defined in this Policy that does not rise to the level of Title IX Sexual Harassment as defined in the Interim Policy on Title IX Sexual Harassment.

Conduct that is initially raised through a formal complaint under the Interim Policy on Title IX Sexual Harassment may also be addressed under this Policy, in the University's discretion, when: (i) the conduct at issue, or some part of it, may constitute a violation of this Policy irrespective of whether it constitutes Title IX Sexual Harassment under the Interim Policy on Title IX Sexual Harassment; (ii) the formal complaint, or some part of it, has been dismissed under the Interim Policy on Title IX Sexual Harassment; or (iii) a final determination of a formal complaint has been made under the Interim Policy on Title IX Sexual Harassment and separate or additional action may be necessary to enforce this policy.

If the Respondent is not a member of the University community or is no longer affiliated with the University at the time of the report or at the time the Complaint Resolution Process is initiated (including when the Respondent has graduated or left the University), the University typically is unable to take disciplinary action or conduct an investigation. **Individuals impacted by any form of discrimination, harassment or sexual misconduct, irrespective of whether it falls under this policy, may contact the Office of Equity to receive support, resources, and information.**

Allegations of misconduct alleged to have occurred prior to August 14, 2020 will be assessed under the policy definitions in place at the time of the conduct and resolved in accordance with this policy.

Individuals impacted by discrimination, harassment or sexual misconduct may contact the Office of Equity to receive support, resources, and information even if they do not wish to move forward with the Complaint Resolution Process described in Section III below.

### **C. Purpose**

Northwestern is committed to fostering an environment in which all members of our community are safe, secure, and free from prohibited harassment, discrimination and sexual misconduct in any form. When learning of conduct or behavior that may not meet these standards, community members and the University are expected to take an active role in upholding this policy and promoting the dignity of all individuals.

### **D. Accessibility**

The Office of Equity is committed to making our services accessible to all members of the Northwestern community. The Office is cognizant of the physical accessibility of our space, the cultural competency of our staff, and the method and tone of the services we provide. Accessibility includes but is not limited to: providing reasonable accommodations to persons with disabilities, including mental health concerns, ensuring our online resources are accessible, providing translation services, and providing competent, respectful, and trauma informed service to people of all identities and expressions.

### **E. Definitions**

The following includes definitions of prohibited conduct under this policy. The Interim Policy on

Title IX Sexual Harassment, criminal and other applicable state laws may use different definitions of these terms.<sup>1</sup>

## 1. Discrimination and Harassment

- a. **Discrimination:** Prohibited discrimination is treating someone differently because of their race, color, religion, national origin, sex, pregnancy, sexual orientation, gender identity, genderexpression, parental status, marital status, age, disability, citizenship status, veteran status, genetic information, reproductive health decision making, or any other classification protected by law (referred to as “protected classes”) in matters of admissions, employment, housing, or services, or in the educational programs or activities Northwestern operates.

In determining whether discrimination occurred, the Office of Equity examines the following:

- Whether there was an adverse impact on the individual’s work or education environment; and
- Whether individuals outside of the protected class received more favorable treatment. If the first two conditions are met, the Office of Equity will consider whether there is a legitimate, non-discriminatory reason for the action.

Examples of discrimination can include:

- Refusing to hire or promote someone because of their membership in a protected class;
- Denying someone a raise or employment benefit because of their membership in a protected class;
- Reducing someone’s job responsibilities because of their membership in a protected class;
- Denying someone access to an educational program based on their membership in a protected class; or
- Denying someone access to a University facility based on their membership in a protected class.

- b. **Harassment:** Prohibited harassment is verbal or physical conduct or conduct using technology based on a protected class that has the purpose or effect of:

- Substantially interfering with, limiting or depriving a member of the community from accessing or participating in the academic or employment environment, and/or substantially interfering with an individual’s academic performance or work performance; or
- Creating an academic or working environment that a reasonable person would consider to be intimidating, hostile, or offensive.

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<sup>1</sup>Information on the applicable state law definitions in Illinois, Florida, California, New York, and Washington, D.C. can be found at <https://www.northwestern.edu/sexual-misconduct/title-IX/relevant-laws.html>

In determining whether the conduct is sufficiently severe or pervasive so as to meet the above standards, OE examines the context, nature, scope, frequency, duration, and location of incidents, as well as the relationships of the persons involved. A person's subjective belief that behavior is intimidating, hostile, or offensive does not make that behavior prohibited harassment under this Policy. The behavior must create a hostile environment and/or substantially interfere with access to a University program or activity from an objective perspective.

Examples of harassment include

- offensive jokes related to a protected class;
- the use of slurs and stereotypes related to a protected class;
- name calling related to a protected class;
- intimidation, ridicule, or mockery connected to a protected class;
- displaying or circulating offensive objects and pictures that are based on a protected class

Please note, general bullying or uncivil behavior that is not based on a protected class does not fall within the purview of this policy or the Office of Equity. However, such behavior may violate the University's expectations regarding [Civility and Mutual Respect](#), [Standards for Business Conduct](#), Northwestern's [Student Handbook](#), or other University policy and should be reported to Human Resources and/or an individual's supervisor (for employees) or Community Standards (for students).

## 2. Sexual Misconduct

- a. **Consent:** Consent represents the cornerstone of respectful and healthy intimate relationships. Northwestern expects 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 initiating a new type of sexual activity within an encounter to ensure that consent is present before acting and that consent is ongoing during sexual activity.

### i. Capacity to consent

Consent is not present when an individual does not have the capacity to give consent, voluntarily or involuntarily, due to age (generally, the age of consent is 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

“Incapacitated” refers to the state where a person does not understand the nature or fact of sexual activity due to the effect of drugs or alcohol

consumption, medical condition or disability, or due to a state of unconsciousness or sleep. **When alcohol is involved, incapacitation is a state beyond drunkenness or intoxication. When drug use is involved, incapacitation is a state beyond being under the influence or impaired by use of the drug.** Alcohol and other drugs impact each individual differently, and determining whether an individual is incapacitated requires an individualized determination.

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, slurred speech, difficulty finding words).

A person may appear to be giving consent but may not have the capacity to do so. **When determining whether a person has the capacity to provide consent, the University will consider whether a sober, reasonable person in the same position knew or should have known whether the other party could or could not consent to the sexual activity.** It is especially important, therefore, that anyone initiating sexual activity is aware of their own level of intoxication as it may impact their ability to assess another person's 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. Aspects of Valid Consent

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

- **Knowing:** All individuals understand, are aware of, and agree as 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 Respondent's intimidation (extortion, menacing behavior, bullying), coercion (severe or persistent pressure causing fear of significant consequences from Respondent if one does not engage in sexual activity), force (violence, physical restraint, or the presence of a weapon), threats (indications of intent to harm, whether direct or indirect), 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 to engage in sexual activity with one person does not constitute consent to engage in sexual activity with another person.

Consent may also be withdrawn at any time, provided the person withdrawing consent makes that known in clearly understandable words or actions.

**b. Sexual Assault**

- Sexual penetration without consent:* Any penetration of the sex organs or anus of another person when consent is not present; any penetration of the mouth of another person with a sex organ when consent is not present; or performing oral sex on another person when consent is not present. This includes penetration or intrusion, however slight, of the sex organs or anus of another person by an object or any part of the body.
- Sexual contact without consent:* Knowingly touching or fondling a person's genitals, breasts, or anus, or knowingly touching a person with one's own genitals or breasts, 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.
- Statutory rape:* Sexual intercourse with a person who is under the statutory age of consent under the laws of the state<sup>2</sup> in which the incident occurred. In Illinois, the age of consent is 17 years old. However, if the offender is in a position of authority or trust over the victim, the age of consent is 18.
- Incest:* Sexual intercourse between persons who are related to each other within the degrees wherein marriage is prohibited by law.

- c. Sexual Exploitation:** Taking sexual advantage of another person or violating the sexual privacy of another when consent is not present.

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<sup>2</sup> 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<sup>3</sup>;
- 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 for the purpose of engaging in sexual conduct with someone who lacks capacity to consent, regardless of whether prohibited sexual conduct actually occurs.

- d. **Dating/Domestic Violence:** Dating violence is any violence (including but not limited to emotional, physical, sexual, and financial abuse or threat of abuse) between two people who are or have been in a social relationship of a romantic or intimate nature. The existence of such a relationship will depend on the length and type of the relationship and the frequency of interactions between the persons involved.

Domestic violence is violence between two people who are or have been in an intimate or romantic relationship, who share a child in common, or who live or have lived together as spouses or intimate partners. Violence against any person by that person's caretaker or guardian (such as abuse against an elderly, young, or disabled person) may also be considered domestic violence. Examples of domestic violence include but are not limited to physical, emotional, sexual, technological and economic abuse or threat of abuse.

- e. **Stalking:** Knowingly engaging in a course of conduct directed at a specific person that one knows or should know would cause a reasonable person to fear for their safety (or the safety of a third party) or suffer substantial emotional distress. "Substantial emotional distress" means significant mental suffering, anxiety or alarm.

Conduct that can amount to stalking may include two or more actions directed at another person<sup>4</sup>, whether done directly, indirectly, through others, via devices, or via any other methods or means (specifically including electronic means e.g. cyberstalking), including but not limited to:

- Following a person;

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<sup>3</sup> Breast-feeding a child is not indecent.

<sup>4</sup> Please note that actions need not be sexual in nature to constitute stalking.

- 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 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.

f. **Sexual Harassment**<sup>5</sup>: Sexual harassment is any unwelcome conduct of a sexual nature where:

- i. Submission to or rejection of such conduct is made, either explicitly or implicitly, a term or condition of a person's employment, academic standing, or participation in any University program and/or activity, or is used as the basis for University decisions affecting the individual (often referred to as "quid pro quo" harassment); or
- ii. The conduct has the purpose or effect of:
  - Substantially interfering with, limiting or depriving a member of the community from accessing or participating in the academic or employment environment, and/or substantially interfering with an individual's academic performance or work performance; or
  - Creating an academic or working environment that a reasonable person would consider to be intimidating, hostile, or offensive.

Examples of conduct that may constitute sexual harassment 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;
- Sexual innuendoes, gestures, or humor; or
- Sexual graffiti, pictures, or posters.

## F. Implementation

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<sup>5</sup> Sexual harassment is illegal in Chicago. Chicago law defines sexual harassment as: "any (i) unwelcome sexual advances or unwelcome conduct of a sexual nature; or (ii) requests for sexual favors or conduct of a sexual nature when (1) submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment, or (2) submission to or rejection of such conduct by an individual is used as the basis for any employment decision affecting the individual, or (3) such conduct has the purpose or effect of substantially interfering with an individual's work performance or creating an intimidating, hostile or offensive working environment; or (iii) sexual misconduct, which means any behavior of a sexual nature which also involves coercion, abuse of authority, or misuse of an individual's employment position."

## 1. Reporting

### a. Reporting Options

The University encourages reporting of discrimination, harassment and sexual misconduct. Members of the University community who believe they have experienced, witnessed or otherwise become aware of discrimination, harassment and sexual misconduct have the right to choose whether or not to report the incident to the University or law enforcement, and have the right to choose whether to engage with the University once the University receives a report.

#### i. Reporting Incidents to the University

Any individual may report alleged or suspected discrimination, harassment or sexual misconduct to the Office of Equity. Reports to the Office of Equity may be made in person, by email, by regular mail, by phone, or electronically as explained below.

**Individuals impacted by discrimination, harassment or sexual misconduct may contact the Office of Equity to receive support, resources, and information even if they do not wish to move forward with the Complaint Resolution Process described in Section III below.** Please see section III(A) (“Participation in Process”) for more information. To speak to someone confidentially without making a report to the University, please see the Confidential Resources listed in Section II(A) below.

While anonymous reports will be reviewed by the Office of Equity, the University’s ability to address misconduct reported by anonymous sources may be significantly limited.

There is no time limit for reporting an incident of discrimination, harassment or sexual misconduct. However, the University encourages reports be made as soon as possible after the incident. The passing of time makes reviewing the evidence more difficult and the memories of involved parties may become less reliable. The Office of Equity reserves the right to investigate or otherwise address any report, regardless of when it is made, based on concern for the safety or well-being of the University community.

The staff identified below are specially trained to work with individuals who report or are accused of discrimination, harassment and sexual misconduct and have knowledge about on- and off-campus resources, services, and options—including the availability of interim measures, as discussed below in Section I(F)(4).

#### **Interim Title IX Coordinator**

Contact: Jessica Galanos

Location: Office of Equity, 1800 Sherman, Suite 4-500, Evanston

Phone: (847) 467-6165

Email: [jessica.galanos@northwestern.edu](mailto:jessica.galanos@northwestern.edu)

### **To File a Report Electronically**

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

<https://bit.ly/NUReportSexualMisconduct>

Individuals may use the form at the following link to electronically file a report of discrimination or harassment with the Office of Equity:

<https://bit.ly/NUReportDiscrimination>

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

### **Other University Reporting Options**

#### **EthicsPoint**

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

Phone: (866) 294-3545

Website: <https://www.northwestern.edu/risk/compliance/report-a-concern/ethicspoint.html>

Upon receipt of a report, an Office of Equity staff member will contact the person who may have experienced discrimination, harassment or sexual misconduct. The outreach from the Office of Equity staff member will generally include information about the reporter's rights and options, as well as resources available to them. For incidents involving sexual misconduct the outreach will also include information regarding medical and confidential counseling and support resources; options for pursuing a complaint and/or reporting the incident to law enforcement; how to request a protective order or no-contact directive; how to request interim measures from the University; how to preserve evidence; and where to access more information.

The outreach will also include an invitation to meet with or provide additional information to an Office of Equity staff member.

#### ii. Reporting Incidents to Law Enforcement

An individual who has experienced sexual misconduct or discriminatory conduct constituting a crime has the right to choose whether to file a police report. Northwestern University encourages individuals to report such incidents to University Police or local law enforcement. Filing a police report can result in the investigation of whether sexual violence or other related crimes occurred and the prosecution of the perpetrator. Timely reporting to the police is an important factor in successful investigation and prosecution of crimes, including sexual violence.

### **The Office of Equity provides information on contacting local and**

**campus law enforcement and will assist an individual in doing so. However, the Office of Equity will not compel an individual to go to law enforcement.**

The Northwestern University Police has a written [statement](http://www.northwestern.edu/up/your-safety/sexual-violence/university-police-guarantee.html) for sexual violence survivors (<http://www.northwestern.edu/up/your-safety/sexual-violence/university-police-guarantee.html>) that reflects its commitment to sensitivity and privacy. University Police can also assist in reviewing options with survivors and identifying and facilitating resources related to: Seeking medical attention;

- Seeking support, advocacy, and counseling services;
- Seeking protective orders from a court;
- Pursuing options under the University's sexual misconduct investigation process.

Employees of the University Police are University employees and therefore are obligated to promptly report incidents of sexual misconduct of which they become aware during the scope of their work as explained below. Employees of the University Police will make reports to the Office of Equity 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: <https://www.northwestern.edu/up/>

#### **Evanston Police Department**

Evanston Campus: 1454 Elmwood Avenue, Evanston  
Phone: 911 or (847) 866-5000 (24 hours)  
Website: <https://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: <https://www.chicagopolice.org/about/police-districts/18th-district-near-north/>

### **b. Reporting Obligations**

- i. Discrimination and Harassment

*All University employees (including student employees) and graduate*

*students with teaching or supervisory authority, are obligated to promptly report incidents of discrimination and harassment of which they become aware in the scope of their work for the University to the Office of Equity unless they are a resource listed in Section II(A). Note: This does not require a person experiencing harm to report the incident.* Failure to fulfill this reporting obligation will be referred to the appropriate office for corrective action. The University encourages all individuals – including students not referenced above – to report discrimination and harassment.

ii. Sexual misconduct

*All University employees (including student employees) and graduate students with teaching or supervisory authority, are obligated to promptly report sexual misconduct of which they become aware in the scope of their work for the University to the Office of Equity unless they are a resource listed in Section II(A). Note: This does not require a person experiencing harm to report the incident.* Failure to fulfill this reporting obligation will be referred to the appropriate office for corrective action. The University encourages all individuals – including students not referenced above – to report sexual misconduct.

iii. Incidents involving minors

As stated in the University's [Policy on Minors at Northwestern](#) all University employees, students, volunteers, and third-party contractors are obligated to report to the Illinois Department of Children & Family Services or applicable state agency (as well as University Police, in emergency situations) any suspected abuse and/or neglect of a child. This includes any and all incidents of sexual misconduct involving minors, which should be reported to the Office of Equity as well.

Reporters should also contact their supervisor (if the reporter is an employee) or the Dean of Students (if the reporter is a student), as well as notifying the Office of Risk Management and the Office of Compliance, Audit, and Advisory Services in writing that a report has been made.

## 2. Supportive Measures

Supportive Measures are non-disciplinary, non-punitive individualized services offered as appropriate, as reasonably available, and without fee or charge to the Complainant or the Respondent before or after the initiation of an investigation, or where no investigation has been initiated. Such measures are designed to restore or preserve equal access to the University's education programs or activities without unreasonably burdening the other party, including measures designed to protect the safety of all parties or the University's educational environment, or deter discrimination, harassment and/or sexual misconduct.

Supportive Measures may include counseling, extensions of deadlines or other course-related adjustments, modifications of work or class schedules, campus escort services, mutual restrictions on contact between the parties, changes in

work or housing locations, leaves of absence, increased security and monitoring of certain areas of the campus, other changes to academic, living, dining, transportation, and working situations, honoring an order of protection or no contact order entered by a State civil or criminal court, and other similar measures. In providing Supportive Measures, the Office of Equity will make every effort to avoid depriving any student of their education or access to the University's program or activities. The Supportive Measures needed by each party may change over time, and the Office of Equity will communicate with parties to ensure that any Supportive Measures in place are necessary and effective based on the parties' evolving needs.

The University will maintain the confidentiality of Supportive Measures provided to either a Complainant or Respondent, to the extent that maintaining such confidentiality does not impair the University's ability to provide the Supportive Measures in question. As noted above, an individual may request to receive support – including the Supportive Measures mentioned in this section – even if they do not choose to participate in the University's Complaint Resolution Process.

### **3. Interim Removal**

At any time after receiving a report of an alleged violation of this policy, the University may remove a student Respondent from the University's Education Programs and Activities on an emergency basis if an individualized safety and risk analysis determines that an immediate threat to the physical health or safety of any student or other individual arising from the allegations justifies removal. In the event the University imposes an interim removal, it will provide the Respondent with notice and an opportunity to challenge the removal decision immediately following the removal. Any emergency removal of a student will involve consultation with the Behavioral Consultation Team and the Division of Student Affairs.

In the case of a Respondent who is a non-student employee, and in the University's discretion, the University may place the Respondent on administrative leave at any time after receiving a report, including during the pendency of the investigation and hearing process. The decision to place a non-student employee on administrative leave will be made by the employee's unit director and the Office of the Provost (for faculty Respondents) or Human Resources (for staff Respondents) upon recommendation of the Office of Equity.

For all other Respondents, including third-party affiliates and guests, the University retains broad discretion to prohibit such persons from entering onto its campus and other properties at any time, and for any reason, whether after receiving a report or otherwise. Such individuals are generally not entitled to any process set forth in this policy, particularly upon removal from campus.

### **4. Retaliation<sup>6</sup>**

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<sup>6</sup> Retaliation for reporting sexual harassment is illegal in Chicago.

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

Members of the community are prohibited from engaging in actions, directly or through others, which are aimed to deter a reasonable party or a witness from reporting discrimination, harassment or sexual misconduct or participating in an investigation or hearing or done in retribution for such activities. A detailed definition of retaliation and examples of retaliatory conduct are provided in the [University's Policy on Non-Retaliation](#).

The Northwestern community is strongly encouraged to report any potential incident of retaliation under this policy to the Office of Equity, who shall assess the matter and take appropriate actions to address such conduct.

#### **5. Amnesty for Sexual Misconduct Complainants and Witnesses**

Northwestern encourages reporting of sexual misconduct and seeks to remove any barriers to making a report. The University recognizes that an individual who has been consuming alcohol (including underage consumption) or using drugs at the time of the incident may be hesitant to make a report because of potential consequences for that conduct. To encourage reporting, an individual who makes a good faith report of sexual misconduct that was directed at them or another person or participates in an investigation as a witness will not be subject to disciplinary action by the University for a conduct or policy violation that is related to and revealed in the sexual misconduct report or investigation, unless the University determines that the violation was serious and/or placed the health or safety of others at risk. This Amnesty provision does not preclude or prevent action by police or other legal authorities. This Amnesty provision may also apply to student groups making a report of sexual misconduct.

#### **6. Free Expression and Academic Freedom**

Northwestern is firmly committed to free expression and academic freedom. The University is equally committed to creating and maintaining a safe, healthy, and harassment-free environment for all members of its community, and firmly believes that these two legitimate interests can coexist.

Discrimination, harassment, sexual misconduct, 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 discrimination, harassment, sexual misconduct or retaliation that involve an individual's statements or speech.

#### **7. Title IX and VAWA Statement**

It is the policy of Northwestern to comply with Title IX of the Education

Amendments of 1972 (and all other applicable laws regarding unlawful discrimination and harassment including, but not limited to, Title VII of the Civil Rights Act of 1964 and the Illinois Human Rights Act), which prohibits discrimination (including sexual harassment and sexual violence) based on sex in the University's educational programs and activities. The University's Interim Policy on Title IX Sexual Harassment may be found here:

<https://www.northwestern.edu/equity/documents/interim-policy-on-title-ix.pdf>.

It is also Northwestern's policy to comply with the Jeanne Clery Disclosure of Campus Security Policy and Campus Crimes Statistics Act, as amended by the Violence Against Women Act. Title IX prohibits retaliation for asserting or otherwise participating in claims of sex discrimination.

VAWA imposes additional duties on universities and colleges to investigate and respond to reports of sexual assault, stalking, and dating or domestic violence, and to publish policies and procedures related to the way these reports are handled. Northwestern has designated the [Title IX Coordinator](#), with assistance of the [Deputy Title IX Coordinators](#), to coordinate Northwestern's compliance with Title IX and VAWA and to respond to reports of violations. The University has directed its Clery Program Manager to coordinate Northwestern's compliance with the Clery reporting related VAWA requirements. 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](http://www2.ed.gov/about/offices/list/ocr/complaintintro.html) or calling 1-800- 421-3481. Employees may also file a charge with the Equal Employment Opportunity Commission regarding an alleged violation of Title VII by calling 1-800-669-4000 or visiting <https://www.eeoc.gov/employees/howtofile.cfm>. Employees may also file a charge with the Illinois Department of Human Rights (IDHR) regarding an alleged violation of the Illinois Human Rights Act by calling 1-800-662-3942 or 1-866-740-3953 (TTY). In addition, after the IDHR has completed its investigation of the complaint, an appeal process is available through the Illinois Human Rights Commission, which can be contacted by calling 312-814-6269 or 312-814-4760 (TTY). Employees may also file a complaint with the Chicago Commission on Human Relations regarding an alleged violation of the Chicago Human Rights Ordinance by calling 312-744-4111 or via email at [cchrfilings@cityofchicago.org](mailto:cchrfilings@cityofchicago.org).

## **G. Consequences of Violating this Policy**

When a determination has been made that an individual has violated this policy, sanctions are determined based on several factors, including the severity of the conduct and any prior policy violations. Sanctions and corrective actions can include, but are not limited to:

- Verbal warning
- Written warning
- Advisory letter
- Conduct review
- Disciplinary hold on academic and/or financial records
- Performance improvement/management process
- Required counseling or coaching

- Required training or education
- Campus access restrictions
- Referral to the Fitness for Duty process
- No trespass order issued by NUPD (with respect to campus locations)
- No-contact directive (with respect to an individual)
- Loss of privileges
- Loss of oversight, teaching or supervisory responsibility
- Probation
- Demotion
- Loss of pay increase
- Transfer (employment)
- Revocation of offer (employment or admissions)
- Disciplinary suspension
- Suspension with pay
- Suspension without pay
- Expulsion
- Termination of employment
- Revocation of tenure
- Termination of contract (for contractors)

The University may assign other sanctions as appropriate to the 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 to imposing sanctions, the University may take steps to remediate the effects of a violation on the impacted parties and others.

Following an investigation, the University may offer additional measures, and/or take other action to eliminate any hostile environment caused by the discrimination, harassment or sexual misconduct, prevent the recurrence of any such conduct, and remedy the effects of any such conduct on the Complainant and the University community. Such measures may include, but are not limited to, the actions referenced above in Section I(F)(2), as well as training or other measures.

**1. Violations of Directives Related to Supportive Measures and Interim Restrictions**

Violations of directives related to supportive measures or interim restrictions may lead to an investigation and disciplinary action, which may include, but is not limited to, any of the sanctions and corrective actions listed in the previous section, including expulsion or dismissal from the University; or termination of employment, including revocation of tenure.

**2. Violations of the Policy on Non-Retaliation**

Individuals who are found to have engaged in retaliation are subject to disciplinary action that may include, but is not limited to, any of the sanctions and corrective actions listed above, up to and including expulsion or dismissal from the University; or termination of employment, including revocation of

tenure. Sanctions for retaliation may be applied regardless of whether there is a finding on the underlying discrimination, harassment, or sexual misconduct complaint.

## **H. Related Information**

### **1. University policies and procedures**

[Interim Policy on Title IX Sexual Harassment Faculty Handbook](#)

[Non-Retaliation](#)

[Policy on Minors at Northwestern](#)

[Policy on Consensual Romantic or Sexual Relationships between Faculty, Staff and Students](#)

[Staff Handbook](#)

[Student Handbook](#)

### **2. Other information**

[Department of Education Office for Civil Rights complaint forms EthicsPoint](#)

[Resource Guide on Non-Title IX Sexual Misconduct Matters](#)

[Resource Guide for Respondents in Non-Title IX Sexual Misconduct Matters](#)

[Resource Guide on Discrimination and Harassment](#)

[Sexual Misconduct Response & Prevention resource page University Police](#)

[Annual Security & Fire Safety Report](#)

[University Police Guarantee for Sexual Assault Victims](#)

## **I. History**

This policy was enacted on August 14, 2020 and updated on September 1, 2021 and September 1, 2022. Midyear updates addressing changes to the City of Chicago's sexual harassment laws were made in July, 2022.

Policy URL: <https://www.northwestern.edu/equity/documents/policy-on-institutional-equity.pdf>

## **II. Resources<sup>7</sup>**

### **A. Confidential Support, Advocacy, and Counseling Resources<sup>5</sup>**

The following Confidential Resources are available for individuals to discuss incidents and issues related to discrimination, harassment, and/or sexual misconduct on a confidential basis. Confidential Resources are not obligated to disclose reports of sexual misconduct to the Office of Equity (under any circumstance) or law enforcement (except in very limited situations, such as when failure to disclose the information would result in

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<sup>7</sup> For additional information, see Northwestern's [Resource Guide on Non-Title IX Sexual Misconduct](http://www.northwestern.edu/sexual-misconduct/docs/NonTitleIXResourceGuide.pdf) (<http://www.northwestern.edu/sexual-misconduct/docs/NonTitleIXResourceGuide.pdf>). Print copies are available by contacting the Office of Equity, at (847) 467-6165.

imminent danger to the individual or to others or as otherwise required by law).

Confidential Resources can provide information about University and off-campus resources, supportservices and other options. As noted above, because of the confidential nature of these resources, disclosing information to or seeking advice from a Confidential Resource does not constitute a report or complaint to the University and will not result in a response or intervention by the University. A person consulting with a Confidential Resource may later decide to make a report to the University and/or law enforcement.

The Medical Resources in Section II(B) are also confidential resources and are not obligated to disclose reports of sexual misconduct to the Office of Equity (under any circumstance) or law enforcement (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 as otherwise required by law).

### **On-Campus Confidential Resources**

<b>Resource</b>	<b>Contact Information</b>	<b>Description</b>
<b>CARE: Center for Awareness, Response &amp; Education</b> <sup>8,9*</sup>	<b>Evanston Campus:</b> 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>	CARE is a confidential space for students impacted by sexual violence, relationship violence, or stalking, including friends or partners of survivors. CARE can be an advisor through the University complaint resolution process. Advocates can provide a space to process, ask questions, safety plan, and learn more about the impact of trauma. CARE also hosts a trauma supportgroup and can connect with legal and medical advocacy, free counseling, and support groups on and off campus
<b>CAPS: Counseling and Psychological Services*</b>	<b>Evanston Campus:</b> 633 Emerson Street, 2nd Floor (847) 491-2151 (24-hours)  <b>Chicago Campus:</b> Abbott Hall, 5th Floor 710 N. Lake Shore Drive (847) 491-2151 (24-hours)	Provides counseling services to students, also provides a counselor on call 24 hours a day.

<sup>8</sup> CARE is designated as the University’s confidential advisor under the Illinois *Preventing Sexual Violence in Higher Education Act*.

<sup>9</sup> Note: Some staff and faculty may be confidential resources in some aspect of their work for the University (e.g. physicians), but are subject to the University’s reporting obligation for information learned in connection with their work for the University outside of a confidential relationship. For example, physicians are confidential resources with respect to information shared with them by patients, but are obligated to report sexual misconduct of which they become aware through work not related to patient care, such as work in labs, classrooms, or student advising.

	<a href="http://www.northwestern.edu/counseling/">www.northwestern.edu/counseling/</a>	
<b>Religious &amp; Spiritual Life</b>	<b>Evanston Campus:</b> 1870 Sheridan Road (847) 491-7256 <a href="mailto:spiritual.life@northwestern.edu">spiritual.life@northwestern.edu</a> <a href="http://www.northwestern.edu/religious-life/">www.northwestern.edu/religious-life/</a>	Provides spiritual guidance for students and other members of the University community.
<b>Faculty Wellness Program*</b>	Director Gaurava Agarwal, MD <a href="mailto:gagarwal@nm.org">gagarwal@nm.org</a> <a href="https://www.northwestern.edu/provost/faculty-resources/work-life/well-being-resources/faculty-wellness.html">https://www.northwestern.edu/provost/faculty-resources/work-life/well-being-resources/faculty-wellness.html</a>	Provides free consultations for faculty members to identify appropriate resources for personal and professional concerns. Resources may be offered over the phone, or faculty members can meet with the Faculty Wellness Program director for further discussion.
<b>Employee Assistance Program</b>	(855) 547-1851 (24 hours) <a href="https://www.northwestern.edu/hr/benefits/well-being/programs/employee-assistance-program/index.html">https://www.northwestern.edu/hr/benefits/well-being/programs/employee-assistance-program/index.html</a>	Provides confidential crisis intervention and short-term counseling for faculty and staff, as well as their household family members at no cost.
<b>Office of the Ombudsperson</b>	<b>Evanston Campus:</b> <a href="mailto:ombuds@northwestern.edu">ombuds@northwestern.edu</a> <a href="https://www.northwestern.edu/ombuds/">https://www.northwestern.edu/ombuds/</a>	Provides confidential and informal assistance for resolving university-related concerns, is independent of the university's formal administrative structure, and considers all sides of an issue in a neutral manner.

### Off-Campus Confidential Resources

Resource	Contact Information	Description
<b>Hotlines</b>	Chicago Metro Rape Crisis Hotline (YWCA): (888) 293-2080  Chicago Domestic Violence Line: (877) 863-6338  Evanston Domestic Violence Line (YWCA): (877) 718-1868  RAINN: Rape, Abuse & Incest National Network (800) 656-HOPE <a href="https://hotline.rainn.org/">https://hotline.rainn.org/</a> (online hotline)	All hotlines provide 24 hour (7 days/week) crisis counseling and information regarding sexual assault, dating violence, and stalking. Survivors and friends of survivors can call.  <i>Note: the hotlines can also provide information on local hospitals, such as what hospitals will have a victim advocate or SANE (Sexual Assault Nurse Examiner) available.</i>

<b>Center on Halsted (LGBTQ Services)</b>	3656 N. Halsted St, Chicago (7 days a week, 8 a.m.to 9 p.m.) LGTBQ Violence Resource Line: (773) 472-6469 <a href="http://www.centeronhalsted.org/avp">http://www.centeronhalsted.org/avp</a>	Services include: counseling services; connecting individuals with professional help, law enforcement, agencies, services, and other providers.
<b>in*power(LGBTQ Survivor Support Services)</b>	4025 N. Sheridan Rd, Chicago (773) 388-1600 ext 3680 <a href="mailto:in.power@howardbrown.org">in.power@howardbrown.org</a> <a href="http://www.howardbrown.org/inpower/">http://www.howardbrown.org/inpower/</a>	Services include: STI testing and treatment,short-term case management, linkage to community resources, holistic health referrals, support groups for young people and adults, legal advocacy
<b>Resilience (Formerly known as Rape Victim Advocates)</b>	Main Office: 180 N. Michigan Ave, Suite 600, Chicago (312) 443-9603 <a href="http://www.ourresilience.org">www.ourresilience.org</a>	Services include: medical and legal advocacy, counseling services (individual and group). Services are free for survivors or friends/partners of survivors.
<b>YWCA- Evanston</b>	1215 Church St, Evanston(847) 864-8445 <a href="https://www.ywca-ens.org">https://www.ywca-ens.org</a>	Services include: counseling and support for survivors of dating/domestic violence, legal advocacy, and residential services (emergency shelter)
<b>Life Span Center for Legal Services and Advocacy</b>	70 E. Lake Street, Suite 600, Chicago (312) 408-1210 <a href="mailto:life-span@life-span.org">life-span@life-span.org</a> <a href="http://www.life-span.org">www.life-span.org</a>	Services include (for survivors of DV, SV, and stalking): legal services, legal advocacy (i.e. assistance with Orders of Protection, etc.), and counseling
<b>Center for Contextual Change</b>	9239 Gross Point Road #300, Skokie (847) 676-4447 x304 (for appointments or a confidential assessment) <a href="http://www.centerforcontextualchange.org">www.centerforcontextualchange.org</a>	Referrals for survivors of sexual and domestic/dating violence: individual and group counseling.  Referrals for perpetrators of sexual and domestic/dating violence: individual and group counseling
<b>Apna Ghar</b>	4350 North Broadway, 2 <sup>nd</sup> Floor Chicago, IL 60613 (773) 334-4663 <a href="http://www.apnaghar.org">www.apnaghar.org</a>	Services include: 24/7 crisis line, legal advocacy, counseling, emergency shelter
<b>Mujeres Latinas en accion</b>	2124 West 21 <sup>st</sup> Place Chicago, IL 60608 (773) 890-7676 <a href="http://www.mujereslatinasenaccion.org">www.mujereslatinasenaccion.org</a>	Services include: counseling, legal advocacy, medical advocacy
<b>Greenlight Family Services (Formerly Porchlight Counseling Services)</b>	(773) 750-7077 confidential helpline and intake <a href="http://greenlightfamilyservices.org/services/counseling">http://greenlightfamilyservices.org/services/counseling</a>	Services include: free counseling for survivors of sexual and/or domestic/dating violence
<b>KAN-WIN</b>	Offices in Chicago and Park Ridge(773) 583-1392 (Chicago) (847) 299-1392 (Park Ridge)	Services include: (multi-lingual) free counseling, legal advocacy (assistance with protective

	24-hour Hotline: (773) 583-0880 <a href="http://www.kanwin.org">www.kanwin.org</a>	orders/court accompaniment), and immigration protection for Asian-American or Asian immigrant survivors of sexual and/or domestic violence.
<b>DC Rape Crisis Center</b>	PO Box 42734 Washington, DC 20015 Business: 202-232-0789 TTY: 202-328-1371 Hotline: 202-333-7273 <a href="http://dcrcc.org/">http://dcrcc.org/</a>	Services include: Individual & group counseling (English and Spanish); a 24-hour crisis hotline; community education & outreach
<b>Network for Victim Recovery of DC</b>	6955 Willow St. NW #501 Washington, DC 20012 (202) 742-1727 <a href="mailto:info@nvrdc.org">info@nvrdc.org</a> <a href="http://nvrdc.org">http://nvrdc.org</a>	Services include: free case management and legal services to victims of crime
<b>M.U.J.E.R. (Miami)</b>	27112 South Dixie Highway Naranja, FL 33032 Helpline/Hotline: (305) 763-2459 (305) 247-1388 <a href="http://www.mujerfla.org">http://www.mujerfla.org</a>	Services include: 24-hour hotline, information and referral, crisis intervention, advocacy and accompaniment, crisis counseling, medical referrals, and case management.
<b>Survivors' Pathway (Miami)</b>	1801 Coral Way, Suite 200 Miami, Florida 33145 (786) 275-4364 <a href="http://survivorspathway.org">http://survivorspathway.org</a>	Services include: counseling and social services
<b>San Francisco Women Against Rape</b>	3543 18 <sup>th</sup> Street #7 San Francisco, CA 94110 (415) 861-2024 (415) 647-7273 (24-hour hotline) <a href="http://sfwar.org">http://sfwar.org</a>	Services include: 24-hour crisis hotline, counseling and support groups, legal advocacy, medical accompaniment and advocacy, and case management
<b>Trauma Recovery Center (San Francisco)</b>	2727 Mariposa Street, Suite 100 San Francisco, CA 94110 (415) 437-3000 <a href="http://traumarecoverycenter.org/">http://traumarecoverycenter.org/</a>	Services include: medical services for acute sexual assault and support services to survivors of interpersonal violence.

## B. Seeking Confidential Medical Assistance in the United States

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

As noted above, the Medical Resources in Sections II(B) are also confidential resources and are not obligated to disclose reports of sexual misconduct to the Office of Equity (under any circumstance) or law enforcement (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 as otherwise required by law).

**1. Medical Services Available On or Near the Evanston and Chicago Campuses**

**Northwestern University Health Service<sup>10</sup>**

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

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

Chicago Campus: 675 North St. Clair Suite 18-200, Chicago  
Phone: (312) 695-8134  
Website: <http://www.northwestern.edu/healthservice-chicago>  
(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 at no charge; Evanston Police Victim Services advocate can be present to provide support services, if desired.*

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

**Northwestern Memorial Hospital, Emergency Department (24 hours)**

*Evidence collection kit available at no charge; Advocate from Resilience will be present to provide support services, if desired.*

Location: 251 E Huron Street, Chicago  
Phone: (312) 926-2000  
Website: <https://www.nm.org/locations/northwestern-memorial-hospital>  
(for more information)

**Amita Health St. Francis Hospital, Emergency Services (24 hours)**

*Evidence collection kit available at no charge; Evanston Police victim services*

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<sup>10</sup>All staff in University Health Services (including team athletic trainers and team physicians) and staff in the Office of Health Promotion and Wellness are considered confidential resources.

*advocate can be present to provide support services, if desired.*

Location: 355 Ridge Avenue, Evanston  
Phone: (847) 316-4000  
Website: <https://www.amitahealth.org/location/amita-health-saint-francis-hospital-evanston-emergency-room>

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. Medical Services Available Near the Miami, Florida Campus**

**Jackson Memorial Hospital Roxcy Bolton Rape Treatment Center (5.8 miles from campus)**

*Evidence collection kit available at no charge.*

Location: 1611 NW 12th Avenue Institute Annex 1st Floor,  
Miami Phone: (305) 585-7273  
Website: <https://jacksonhealth.org/locations/roxcy-bolton-rape-treatment-center/>

**3. Medical Services Available Near the Washington, D.C. Campus**

**MedStar Washington Hospital Center (2.9 miles from campus)**

*Evidence collection kit available at no charge via DC Forensic Nurse Examiners.*

Location: 110 Irving Street NW, Washington, D.C.  
Phone: (202) 877-7000  
Website: <https://www.medstarwashington.org>

**4. Medical Services Available Near the San Francisco Campus**

**Zuckerberg San Francisco General Hospital (7 miles from campus)**

*Evidence collection kit available at no charge; additional/follow-up services available via their Rape Treatment Center.*

Location: 1001 Potrero Avenue, San Francisco  
Phone: (628) 206-8000  
Website: <http://zuckerbergsanfranciscogeneral.org/>

**For information regarding seeking medical assistance at the Doha, Qatar (NU-Q) campus, please see Appendix A. Appendix A contains a complete summary of information regarding reporting sexual misconduct and receiving support (including confidential support) at the NU-Q campus.**

**C. Preserving Physical 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. 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 preserve 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, 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:

**1. General physical evidence preservation suggestions:**

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

**2. Physical evidence preservation suggestions specific to sexual assault:**

- Because some evidence, particularly evidence that may be located on the body, dissipates quickly (within 48-96 hours), individuals who have been sexually assaulted and wish to preserve evidence should go to a hospital or medical facility immediately to seek a medical examination and/or evidence collection. Under Illinois law, any cost for an emergency medical or forensic examination for a victim of sexual violence that is not covered by private

insurance or Illinois Public Aid will be covered by the Illinois Department of Healthcare and Family Services, and should not be billed to the patient.

- An individual who has been sexually assaulted and wishes to preserve evidence should, if possible, not shower, bathe, douche, smoke, brush teeth, eat, drink, use the bathroom, or change clothes or bedding before going to the hospital or seeking medical attention.
- If the individual who has been sexually assaulted decides to change clothes or bedding and wishes to preserve evidence, they should not wash the clothes worn or bedding used during the assault, and should bring them to a hospital, medical facility, or the police in a non-plastic (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.

#### **D. Educational Training, Awareness, and Prevention Programs<sup>11</sup>**

When learning of conduct or behavior that may not meet the standards defined in the Policy, community members and the University are expected to take an active role in upholding this policy and promoting the dignity of all individuals. The University offers a variety of training, awareness, and prevention programs to help prevent discrimination, harassment, and sexual misconduct within the Northwestern community. The University strives to ensure that such programming is developed to be culturally relevant; trauma informed; inclusive of diverse communities and identities; sustainable; responsive to community needs; informed by research or assessed for value, effectiveness, and outcome; and considerate of 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 discrimination, harassment, and sexual misconduct, and the University's investigation and resolution procedures.

For information on educational training, awareness, and prevention programs offered each year, see: <https://www.northwestern.edu/sexual-misconduct/education>.

### **III. Complaint Resolution Process**

#### **A. Introduction and General Procedures**

##### ***Introduction***

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<sup>11</sup> The City of Chicago requires training annually, including: a. A minimum of one hour of sexual harassment prevention training and bystander training for all employees; and b. A minimum of two hours of sexual harassment prevention training for anyone who supervises or manages employees.

The procedures below outline the process the University follows when it receives a report alleging a violation of the *Policy on Institutional Equity* by a member of the Northwestern community<sup>12</sup>. For the purposes of this Policy, “by a member of the Northwestern community” means current students, current faculty (as defined by the Faculty Handbook), current staff members, and current student or employee groups. The Office of Equity retains discretion on whether to extend this process to current third-party affiliates who have a formal (including contractual) relationship with the University. Visitors to campus who are accused of discrimination, harassment or sexual misconduct are not entitled to the process set forth in this policy. The Office of Equity (“the Office”) is responsible for handling reports alleging discrimination, harassment and sexual misconduct. In addition, the Office may consolidate complaints alleging discrimination, harassment, or sexual misconduct under this policy with complaints alleging potential violations of other University policies where the allegations arise out of the same facts or circumstances. The University may apply these complaint resolution procedures to such consolidated complaints in place of the community standards administrative hearing process (UHAS) or other University investigation process that otherwise would apply. University groups, including student groups, and departments are expected to report concerns regarding alleged or suspected discrimination, harassment, or sexual misconduct to the Office of Equity and not to take action to attempt to investigate or resolve such complaints independently. All reports of alleged violations of this policy will be handled in a prompt, fair, and impartial manner in accordance with these complaint resolution procedures, other University policies and processes, and applicable laws and regulations, including Title VII, Title IX<sup>13</sup>, the *Violence Against Women Act*, the *Illinois Preventing Sexual Violence in Higher Education Act*.

The process described below is Northwestern’s internal University process to determine whether Northwestern policy was violated and is not a court system. As such, Northwestern’s process does not use the same rules of procedure and evidence as those used by courts or law enforcement. **A person who has experienced a crime has the right to simultaneously file and pursue a criminal complaint with law enforcement and a complaint with the University if they choose, and to be assisted by the University in notifying law enforcement authorities if they choose, or to decline to notify such authorities.** Parties may also have options to file civil actions in court.

Because allegations of discrimination, harassment and sexual misconduct can sometimes raise challenging new issues, the University reserves discretion to take reasonable actions to address those issues in a manner consistent with the spirit of the applicable policies and procedures, while preserving fairness for both parties and maintaining the integrity of the complaint resolution process.

### ***Participant Roles***

- A **Complainant** is the person who has been impacted by an alleged policy violation and has chosen to participate in the complaint resolution process. (This person is called a **reporter** for purposes of other conduct violations handled in

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<sup>12</sup> When a current Northwestern employee or student is accused of violating this policy in the context of an affiliate organization (e.g. a Northwestern affiliated hospital), the Office of Equity will collaborate with the affiliate organization and the University retains the right to adopt the findings of the affiliate.

<sup>13</sup> Title IX sex and pregnancy based discrimination matters are addressed under this policy, while Title IX Sexual Harassment matters are handled under the University’s Interim Policy on Title IX Sexual Harassment.

the Office of Community Standards.)

- A **Respondent** is the person who is alleged to have violated University policy.
- **Parties** is a term that refers to the Complainant and the Respondent collectively.
- A **witness** is a person who has knowledge related to specific aspects of a case.
- An **advisor** is a support person who may be present to provide support to a Complainant or Respondent throughout an investigation and/or hearing. An advisor may not also serve as a witness in the same matter.

### *Participation in Process*

The University invites Complainants to participate fully in the complaint resolution process. In order for the University to investigate a complaint and/or enable a Respondent to fully respond to the allegations, most situations will require the Complainant's participation and that their identity be disclosed to the Respondent.

When individuals report allegations of discrimination, harassment or 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 reports may be limited. If a Complainant wants the University to conduct an investigation under these procedures but does not wish to participate in the investigation, the University will determine whether it is possible to move forward without the Complainant's participation. In some cases, it will not be possible to do so. If an individual reporting discrimination, harassment or 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 Office of Equity may determine that the University needs to proceed with an investigation, including potentially disclosing the identity of the Complainant. In such cases, the University will not compel an individual to participate in the investigation. The Office will consider the following factors in reaching a determination on whether to proceed:

- The totality of the known circumstances;
- The nature and scope of the alleged conduct, including whether the reported behavior involves the use of a weapon;
- The respective ages and roles of the Complainant and Respondent;
- The risk posed to any individual or to the campus community by not proceeding, including the risk of additional violence;
- Whether there have been other reports of other prohibited conduct or other misconduct by the Respondent;
- Whether the report reveals a pattern of misconduct (e.g., via illicit use of drugs or alcohol) at a given location or by a particular group;
- The Complainant's interest in the University's not pursuing an investigation or disciplinary action and the impact of such actions on the Complainant;
- Whether the University possesses other means to obtain relevant evidence;
- Fairness considerations for both the Complainant and the Respondent;
- The University's obligation to provide a safe and non-discriminatory environment; and
- Any other available and relevant information.

The University invites Respondents to participate fully in all aspects of the complaint resolution process. If a Respondent elects not to participate in any part of the process, the University may proceed without the Respondent's participation. Respondents will be held

accountable for any outcomes issued, even if they decline to participate.

The University invites witnesses to participate in investigation processes. The University will not compel an individual to participate in the investigation.

All participants have the responsibility to be completely truthful with the information they share at all stages of the process. Any individual who knowingly or intentionally provides false information as part of a report or investigation under this Policy will be subject to discipline in accordance with the procedures set forth in the Student Handbook, Faculty Handbook, or Staff Handbook. This provision does not apply to a good faith report that is not substantiated or proven by a preponderance of the evidence.

### ***Privacy and Sharing of Information***

The University considers reports and investigations to be private matters for the parties involved. For that reason, the University will protect the identity of persons involved in reports of alleged violations of this Policy to the best of its ability. The University will only share personally identifiable information with persons with a need to know such information in order for the University to investigate and respond to the report or to provide resources or support services. The identities of witnesses are typically shared with the parties, however, based on the specific facts, requests, and circumstances of a particular case, the Office of Equity has discretion to anonymize witnesses when appropriate. The University does not publish the names nor post identifiable information about persons involved in a report of discrimination, harassment, or sexual misconduct in the University Police Daily Crime Log (Blotter) or elsewhere online.

All participants in an investigation will be informed that privacy enhances the integrity of the investigation, protects the privacy interests of the parties, and protects the participants from statements that might be interpreted to be retaliatory. For these reasons, the complainant and respondent will be asked at the beginning of the investigation to keep the information related to the investigation and resolution private, to the extent consistent with applicable law. Witnesses and advisors will be asked to keep any information learned in an investigation meeting confidential, to the extent consistent with applicable law.

Certain types of policy violations are considered crimes for which the University must disclose crime statistics in its Annual Security Report that is provided to the campus community and available to the public. These disclosures will be made without including personally identifying information.

### ***Case Resolution Timeline***

The University strives to resolve all cases in a prompt and timely manner. Although the length of each investigation will vary based on the circumstances of the case, the University strives to complete each investigation within ninety (90) calendar days of sending the written notice of investigation.

Additionally, the timeline for a case may be affected by breaks in the academic calendar, availability of the parties and witnesses (including due to a leave of absence), scope of the investigation, need for interim actions, and other unforeseen or exigent circumstances.

The parties will be periodically updated on the status of their case. In cases where there is a simultaneous law enforcement investigation, the University may need to temporarily delay its investigation while law enforcement gathers evidence.

However, the University will generally proceed with its investigation and resolution of a complaint during any law enforcement investigation.

### ***Conflicts of Interest, Bias, and Procedural Complaints***

No investigator, panelist, or appeal reviewer will make findings or determinations in a case in which they have a material conflict of interest or material bias. Any party who believes one or more of these University officials has a potential material conflict of interest or material bias must raise the concern to the Office of Equity within two (2) calendar days of discovering the perceived conflict so that the University may evaluate the concern and find a substitute, if appropriate. The Office of Equity will determine whether a conflict of interest exists. The failure of a party to timely raise a concern of a conflict of interest or bias may result in a waiver of the issue for purposes of any appeal.

### ***Standard of Evidence***

The University uses the preponderance of the evidence standard in investigations of complaints alleging discrimination, harassment or sexual misconduct and any related violations. This means that the investigation determines whether it is more likely than not that a violation of the policy occurred.

### ***Advisor/Legal Counsel***

An advisor is a support person who may be present to provide support to a Complainant or Respondent throughout an investigation and/or sanctioning process. Complainants and Respondents may be accompanied by one advisor throughout the investigation and any sanctioning process, provided that the involvement of the advisor does not result in an undue delay of the process. It is the responsibility of each party to coordinate scheduling with their advisor for any meetings. An advisor may not speak, write, or otherwise communicate with an investigator, panelist, or appeal reviewer on behalf of the Complainant or Respondent. Advisors may not engage in behavior or advocacy that harasses, abuses, or intimidates either party, a witness, or individuals involved in resolving the complaint. Advisors who do not abide by these guidelines may be excluded from the process.

In any matter involving a complaint of sexual assault, stalking, or dating or domestic violence, the advisor may be any person of the party's choosing, including an attorney. However, an advisor may not also serve as a witness in the same matter, and the advisor's participation is limited to the supportive and non-participatory role described above. A representative from the University's Office of General Counsel may attend any proceeding where an attorney serving as an advisor for any party is present. In matters not involving a complaint of sexual assault, stalking, or dating or domestic violence, advisors cannot be a witness or party in the matter or a related matter, a family member of the Complainant or Respondent, or an attorney. A union representative may serve as an advisor, where applicable.

## **B. Initial Inquiry**

Upon receipt of a report of discrimination, harassment or sexual misconduct, or when a Complainant otherwise chooses to move forward with the complaint resolution process, the first step is an initial inquiry. An initial inquiry is an assessment by the Office of Equity as to whether the allegations, if substantiated, would rise to the level of a violation of University Policy(ies); a determination of the specific policy(ies) implicated; and an assessment of appropriate University response.

As a result of the initial inquiry, the Office of Equity may determine that the conduct reported falls under the scope of the University's Interim Policy on Title IX Sexual Harassment and proceed to apply the procedures of that policy.

If the Office of Equity determines that the conduct reported cannot fall under the scope of the Interim Policy on Title IX Sexual Harassment but could fall within the scope of this Policy, the possible next steps include:

- Close the Case: The Office may close a case when insufficient information exists to move forward or when the alleged misconduct—even if substantiated— would not be a violation of policy. The Office may, in its discretion, reopen a case in the future if additional information becomes available.
- Educational Response (See section C below)
- Restorative Resolution (See section D below)
- Formal Resolution (See section E below)

## **C. Educational Response**

Educational response involves measures taken by the University in response to a report of discrimination, harassment or sexual misconduct when formal resolution is not desired by the person who may have experienced the misconduct, when there is not enough information to proceed with a formal resolution process against a known Respondent, and/or where the Office of Equity deems it an appropriate response. Educational response is not used where the Office of Equity has determined that the University must proceed with an investigation. (See *Participation in Process*, above)

An educational response does not result in findings related to responsibility or in sanctions. An educational response does not preclude further steps, including formal resolution, if a complaint is later made or additional information is received by the Office of Equity. Educational response may include, but is not limited to:

- An educational meeting with the subject of the report
- Training for a group or unit
- An advisory letter

## **D. Restorative resolution<sup>14</sup>**

In matters where a complaint has been filed and has passed initial inquiry, the parties may

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<sup>14</sup> The University's Restorative Justice Program is currently in development. The restorative resolution option will become available upon the launch of the program.

elect to resolve the matter through the University's Restorative Justice Program. Restorative resolution is voluntary and the University will not require parties to engage in this process. Parties interested in restorative resolution will receive a written notice disclosing: the allegations, the requirements of the restorative process including the circumstances under which it precludes the parties from resuming a complaint arising from the same allegations, and notice that at any time prior to agreeing to a resolution, any party has the right to withdraw from the informal resolution process and resume the Complaint Resolution Process with respect to the complaint. In the event a party withdraws from the restorative process, records from the restorative process will not be shared with those investigating the matter but may be maintained by the Restorative Justice Program. All parties will be asked to provide voluntary, written consent to the restorative process before it begins. This process will not be used to resolve allegations that an employee sexually harassed a student.

## **E. Formal Resolution**

### ***Notification to Respondent***

The Institutional Equity complaint resolution process operates under a standard of fairness for all parties involved. Within seven (7) calendar days of completing an initial inquiry resulting in the decision to begin the Formal Resolution process, the Office of Equity will provide written notice to the parties whose identities are known that includes:

- Notice of Northwestern's complaint resolution process.
- Sufficient details of the allegations known at the time so that the parties may prepare a response before an initial interview with the investigator(s), including:
  - the identifies of the parties involved in the incident, if known;
  - the conduct alleged to constitute a violation of policy; and
  - the date and location of the incident(s), if known.

The written notice will inform the parties of the University's prohibitions on retaliation and knowingly making false statements or knowingly submitting false information during the complaint resolution process.

If, in the course of an investigation, the University decides to investigate additional allegations about the Complainant or Respondent that arise that were not included in the initial notice, the Office of Equity will provide notice of the additional allegations to the parties whose identities are known pursuant to the requirements above.

### ***Acceptance of Responsibility***

Prior to the conclusion of an investigation, the Respondent may elect to take responsibility for the prohibited conduct by contacting the Office of Equity in writing. Following an acceptance of responsibility, the Office of Equity may solicit additional information relating to the matter. The Office of Equity will issue a brief outcome determination to the parties summarizing the allegations and stating the Respondent has accepted responsibility, and will refer the matter to the appropriate office for sanctioning as delineated in the resolution sections below. Following the determination of sanctions, parties may appeal the sanctions imposed but not the finding(s) of responsibility as accepted by Respondent. In the event a Respondent decides to accept responsibility for

some but not all of the allegations, the Office of Equity will determine whether to sever the matter, sending the allegations for which the Respondent has accepted responsibility to the appropriate office for sanctioning and continuing with the formal resolution process for the remaining allegations. Alternatively, the Office may determine it will proceed with the formal resolution process for all allegations.

### ***Withdrawal of Complaint***

At any time prior to the conclusion of an investigation, the Complainant may request to withdraw the complaint, or any discrete allegations in the complaint, by contacting the Office of Equity in writing. The Office of Equity will determine whether to close the case or whether it is necessary to continue with the formal resolution process with regard to any or all allegations without the Complainant's continued participation.

### ***Investigation***

The Office of Equity investigates complaints proceeding through formal resolution. Depending upon the circumstances, one or more investigators will be assigned from the Office of Equity. In some cases, another University office may conduct an investigation under the direction of the Office, or an outside investigator may be retained. All investigators are trained on applicable law and the University's policies and procedures. Depending on the circumstances and in its discretion, the University may either consolidate or sever the investigation and/or sanctioning of multiple complaints involving the same Respondent and/or complaints where the parties have made discrimination, harassment or non-Title IX sexual misconduct allegations against each other. In the event a community member with multiple affiliations with the University (e.g., a staff member who is also a student) is found to have violated this policy, the University may initiate multiple sanctioning processes to address the violation in relation to each affiliation.

During the investigation, the investigator(s) will identify, elicit, and gather evidence related to the alleged misconduct, including inculpatory and exculpatory evidence. The burden of gathering evidence sufficient to reach a determination of whether or not a policy violation has occurred lies with the University and not with the parties.

During the investigation, the Complainant will have the opportunity to describe their allegations and present supporting evidence to the investigator(s). The Respondent will have the opportunity to hear the allegations, respond to them, and present supporting evidence to the investigator(s).

Investigation meetings are not audio or video recorded by the University, and may not be recorded by any participant. Parties and witnesses may take notes during investigation meetings. The Complainant and the Respondent will have an equal opportunity to present names of potential witnesses and to propose questions the investigator(s) might ask the other party. Complainants and Respondents may identify potential factual witnesses but may not present character witnesses. The investigator(s) will take the witness lists provided by the Complainant and Respondent into consideration when identifying the witnesses they will interview and what questions they might ask each witness, but these decisions are solely within the investigator's discretion. The investigator(s) retain discretion to limit the number of witness interviews the investigator(s) conduct if the investigator finds that testimony would be unreasonably cumulative, or if the witnesses

do not have information relevant to the allegations at issue. The investigator(s) may also choose to interview other witnesses not identified by the parties.

Generally, the investigator(s) will meet with each party and each witness separately and may hold multiple meetings with a party to obtain all necessary information. The parties may submit additional materials or information to the investigator(s) at any time before the conclusion of the investigation.

### ***Report review procedures***

#### **1. Preliminary Investigative Report:**

After each party has had the opportunity to meet with investigator(s), identify witnesses, and suggest questions, and the investigator(s) have completed witness interviews and the gathering of evidence, the investigator(s) will prepare a preliminary investigative report. The preliminary investigative report will include a summary of the relevant information provided by the Complainant, the Respondent, and each witness, and either a copy or written summary of all relevant evidence collected during the investigation. The preliminary investigative report will not contain any findings.

The parties will be provided with an opportunity to review the preliminary investigative report and respond in writing. Typically, the report will be provided to each party electronically. Parties are expected to maintain the privacy of this document and may not distribute this document. Unauthorized distribution of this document may result in referral to the appropriate office for disciplinary action.

The parties may each submit written comments, feedback, additional documentary evidence, requests or additional steps in the investigation, suggest written relevant questions for any party or witness, names of additional witnesses, or any other information they deem relevant to the investigator(s), up to twenty (20) pages, within ten (10) calendar days after the preliminary report is made available for review. The Office of Equity may, in its discretion, waive or adjust the page or time limit for the feedback.

The investigator(s) will review the written feedback provided by the parties and conduct any additional investigation necessitated by that feedback. In the event new, relevant information has been provided, the investigator(s) will prepare a second preliminary investigative report incorporating the new relevant information. In the event a second preliminary report has been prepared, the parties will be provided a copy of the second preliminary investigative report and will have a second and final opportunity to review the new information and provide any written feedback as described above before the investigator(s) proceed with finalizing the report. The parties may each submit up to ten (10) pages of feedback regarding the new information within ten (10) calendar days after it is made available for review.

The parties are permitted to review the preliminary investigative report and second preliminary investigative report solely for the purposes of this grievance

process and may not photograph or disseminate the report to the public.

### ***Investigation Outcome***

After reviewing all feedback submitted by the parties to the preliminary investigative report(s), the investigator(s) will incorporate all relevant feedback into a final investigative report and provide a copy of the final investigative report to the Office of Equity. The Office of Equity will review the final investigative report and will reach a determination regarding whether the facts that are supported by a preponderance of the evidence constitute one or more violations of the *Policy on Institutional Equity* or other identified policies at issue as alleged in the complaint.

The Complainant and the Respondent will both be notified simultaneously in writing of the outcome of the investigation. The notifications will include findings related to alleged violations of policy and the rationale for all findings. If the complaint presents more than a single allegation of misconduct, a finding will be made separately as to each allegation.

#### **1. Resolution of cases where no violation has been found**

Complainants and Respondents will be notified of their appeal rights and appeal procedures. As noted above, the University encourages the parties to maintain privacy of all communications related to findings.

#### **2. Resolution of cases where a violation has been found**

If the Respondent is found to be responsible for one or more policy violations, the notification of findings will include information regarding the sanctioning process. Sanctions will be recommended and/or determined as follows:

- For student Respondents, in the event a policy violation is found, the Office of Equity will provide the final investigative report to the Office of Community Standards who will determine sanctions and corrective actions in accordance with the procedures set forth in the Student Handbook. The Office of Community Standards will provide written notice of any sanction(s) imposed to the parties for violations of this policy simultaneously within seven (7) calendar days of the sanctioning decision. The notice will reference findings made by the Office of Equity and will include the sanction(s), a summary of the rationale, and information about the appeal process.
- For staff Respondents, in the event a policy violation is found, the Office of Equity will provide the final investigative report to the Office of Human Resources and the Respondent's manager(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, in the event a policy violation is found, the Office of Equity will make a recommendation regarding whether the policy violation warrants considering termination or suspension. The final

investigative report and the recommendation will be sent by the Office of Equity to the faculty member's department chair, the dean, and the Associate Provost for Faculty. Next steps, including sanctions or corrective actions imposed, will be determined in accordance with the procedures set forth in the Faculty Handbook.

- For Respondents holding any other status, sanctions and/or corrective actions will be determined by the appropriate University office, depending on the status of the Respondent.

The Complainant will be notified of remedies offered or provided to the Complainant, sanctions imposed on the Respondent that directly relate to the Complainant, and any other steps the University has taken to prevent the recurrence and eliminate a discriminatory or hostile environment, if one was found to exist. In a case related to alleged sexual assault, stalking, or dating or domestic violence, the notification of sanction to the Complainant will also include all sanctions imposed on the Respondent, not just those directly related to the Complainant.

The Respondent will be informed of all sanctions imposed. The Respondent generally will not be notified of the individual remedies offered or provided to the Complainant.

Both Complainants and Respondents are informed of appeal procedures. As noted above, the University encourages the parties to maintain privacy of all communications related to findings and sanctions.

## **F. Appeals**

The Complainant or Respondent may appeal the findings and/or, if sanctions are imposed, the determination of sanctions. An appeal will be handled in a manner consistent with any applicable terms or procedures in the Faculty Handbook, Staff Handbook, Student Handbook, or applicable contract. Otherwise, the terms and procedures outlined in these guidelines will control.

An appeal must be made within ten (10) calendar days of the date of the written notification of the findings or, if sanctions are imposed, the written notification of the sanctioning determination. An appeal must be in writing and specify the basis for the appeal. An appeal is limited to fifteen (15) pages. The original finding is presumed to have been decided reasonably and appropriately by a preponderance of the evidence. The only grounds for appeal are as follows:

- New information discovered after the investigation that could not have reasonably been available at the time of the investigation and is of a nature that could materially change the outcome;
- Procedural errors within the investigation or resolution process that may have substantially affected the fairness of the process; or
- An outcome (findings or sanctions) that was manifestly contrary to the weight of the information presented (i.e., obviously unreasonable and unsupported by the great weight of information).

If either party submits an appeal, the other party will be provided with a copy of the appeal and given ten (10) calendar days to submit a written response. A written response is limited to fifteen (15) pages. The relevant appeal reviewer may, in their discretion, adjust the time limit for the appeal and/or response.

In the event sanctions were imposed, it shall be in the discretion of the Senior Director, Equal Opportunity and Access and/or the Senior Director, Sexual Misconduct Response and Resources, and the sanctioning office whether the sanctions shall be implemented or stayed pending resolution of an appeal.

Appeals will be handled by the following reviewers, who may delegate the review of an appeal to a designee, and will delegate review in any case in which they cannot serve as an impartial reviewer.

**An appeal of a complaint against a student should be addressed to:**

*Associate Dean/Director of Community Standards*  
*Scott Hall*  
*601 University Place*  
*Evanston, IL 60208*  
[lucas.christain@northwestern.edu](mailto:lucas.christain@northwestern.edu)

**An appeal of a finding in a complaint against a faculty member should be addressed to:**

*Associate Provost for Faculty*  
*Rebecca Crown Center*  
*633 Clark Street*  
*Evanston, IL 60208*  
*(847) 491-8543*  
[assoc-prov-faculty@northwestern.edu](mailto:assoc-prov-faculty@northwestern.edu)

**An appeal of a complaint against a staff member<sup>15</sup> or Respondent of any status not named above should be addressed to:**

*Vice President for Human Resources*  
*720 University Place*  
*Evanston, IL 60208*  
*(847) 491-7505*  
[lorraine.goffe@northwestern.edu](mailto:lorraine.goffe@northwestern.edu)

The appeal will be decided as expeditiously as possible, though the timeframe may vary based on the scope of the appeal or unforeseen circumstances. A written decision regarding the appeal will be issued to the parties simultaneously within seven (7) calendar days of making a decision. The appellate reviewer may review the full case, beyond the aspects of the case outlined in the request for appeal. If the appellate reviewer does not find that any of the three grounds for appeal are present in the case, the outcome will be upheld. If the reviewer finds that any of the grounds for appeal are present in the case, they may amend the outcome, may issue a new outcome, or may refer the matter back to the investigator(s) for further consideration. A final outcome on an appeal is not subject to further appeal.

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<sup>15</sup> The Staff Handbook provides an additional process for staff members appealing a sanction of termination.



## **Appendix A: Summary of Information on Reporting Sexual Misconduct and Receiving Support (including confidential support) and Resources at the NU-Q Campus**

### **Options and Resources**

How can Northwestern help?

Knowing what options and resources are available will be helpful if you or someone you know experiences sexual misconduct.

Persons who may have experienced sexual misconduct have options:

1. Seek Medical Attention
2. Speak with On-Campus Confidential Resources
3. Access Off-Campus Resources
4. Contact the Police
5. Contact the University's Office of Equity
6. Request Interim Measures
7. Preserve Evidence

More detailed information about each of these options is provided below.

#### **1. Seek Medical Attention**

*In Qatar, if a survivor goes to the hospital, they may not retain sole discretion over whether to pursue criminal charges. Medical personnel at hospitals are required to alert the police when it appears that the person seeking treatment has sustained an injury as a result of a criminal offense, including sexual assault. The person seeking treatment then could be required to speak with the police. Survivors should visit a hospital or doctor with whom they feel comfortable. Survivors can talk to the NU-Q Chief Operations Officer for more information.*

If the survivor chooses not to go to the emergency room, s/he should still consider seeing a private doctor or a clinician. Survivors are encouraged to inquire about and understand the extent of confidentiality healthcare providers can provide to the survivor of sexual violence. The confidentiality laws and regulations may differ substantially from those in other countries.

Emergency contraception is not available in Qatar. Rape evidence collection may not be available in Qatar.

Individuals who have been sexually assaulted may choose to go to the emergency room. The nearest hospitals to the Northwestern University in Qatar campus are:

#### **Al-Ahli Hospital (6km from Education City)**

Ahmed Bin Ali Street

Emergency 24 hours a day, 7 days a week

+974 4489 8888

#### **Sidra Medicine (1km from Education City)**

*Women and children only*

Dukhan Road opposite Northwestern University in Qatar

Outpatient: Sunday-Thursday, 7:00 am – 4:00 pm  
+974 4003 3333

There is also medical care available at the following location on campus:

**Qatar Foundation Primary Healthcare Center (QF PHCC)**  
HBKU Student Center  
+974 4454 1244 (call to inquire about hours of operation)

## 2. Speak with On-Campus Confidential Resources

These campus resources keep communications confidential except in very limited situations (e.g. minors, imminent danger).

*Employee Assistance Program (EAP)* (provides confidential short-term counseling services to employees via telephone)

Visit <http://www.livewell.optum.com> and click on ‘My Services’ for more information or call:

+974 4454 5293 or +44 1865 397 074 (UK direct number) Students have the following confidential ~~care~~ available:

Free, short-term and confidential counseling services for students:

NU-Q Counseling, Health and Wellness  
NU-Q 1-320  
+974 4454 5073 or [patricia.collins@northwestern.edu](mailto:patricia.collins@northwestern.edu)

Counseling, Health and Wellness is available as a free confidential counseling option available to Northwestern University in Qatar students who have experienced sexual assault, dating or domestic violence, or any other type of sexual violence. Counseling, Health and Wellness will honor the privacy of your information. If the individual wants to notify the police, Counseling, Health and Wellness staff can be a resource. Regardless of whether the survivor wants to involve police, s/he may benefit from talking to a professional counselor.

Counselors listen and help survivors work through any anger, pain, sadness, relationship issues or coping mechanisms that may be related to sexual misconduct. Sometimes the effects are felt long after an incident occurred. It is never too late to seek counseling, even months or years later.

If you would like to learn more about counseling and other options available to survivors, you can talk to Counseling, Health and Wellness staff member confidentially.

## 3. Access Off-Campus Resources

Regardless of whether an individual wants to officially report sexual misconduct, s/he may explore independent counseling options.

### **Private Hospitals with physical and mental health resources available**

Al Ahli Hospital	+974 4489 8888 / +974 4489 8817
Doha Clinic Hospital	+974 4438 4333

American Hospital	+974 4442 1999
Al Emadi Hospital	+974 4466 6009
Social Protection and Rehabilitation	974 4409 0999 Hotline:108

*(Counseling, psychological and shelter services for women and children)*

**Government Hospitals and Centers with physical and mental health resources available**

Hamad General Hospital	+974 4439 4444
Al Khor Hospital	+974 4474 5555
HMC Customer Service Center	16060 (Sun-Thurs 7am-10pm; Fri 2pm-10pm; Sat 10am-6pm)
Nesma'ak	
Wifaq/Family Consulting Center	+974 4406 9902 (mental health resources only)

Students may also wish to investigate private service providers of their choice, but are encouraged to inquire about and understand the extent of confidentiality they can provide to the survivor of sexual violence. The confidentiality laws and regulations may differ substantially from the protection laws in their home country.

**4. Contact the Police**

Survivors are encouraged to talk to the Chief Operations Officer for more information on what may happen if they file a police report. Generally, once a sexual assault is reported to the police, physical evidence of a struggle is collected and then the case is referred to the prosecutor, who then determines if a crime took place. The amount of physical evidence which shows a struggle will usually decide the case. **If physical evidence is inconclusive, the case would be dismissed, and the survivor might either be asked to sign a statement or be jailed.**

**In an emergency dial +974 4454 0999 (on campus) or 999 (off campus) Police Reports and Respecting the Survivor's Decisions**

There is no right or wrong way for a survivor to proceed. The decision to report an assault to the police is a personal one.

You should help a student or colleague make a police report if they want your help, but if they do not want to, you should also respect that decision. Publicity, concerns over revictimization, historical poor treatment at the hands of the police, or fear of being jailed are examples of reasons a survivor might not want to involve the police.

**5. Contact the Office of Equity**

Whether or not the individual makes a police report, they can contact and make a report to the University. An individual has the right to choose whether to report the incident to the Office of Equity for additional options and support and/or to request an investigation. 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.

**To report sexual misconduct to Northwestern, contact:**

Office of Equity

Reporting form: <https://bit.ly/NUReportSexualMisconduct>

Email: [equity@northwestern.edu](mailto:equity@northwestern.edu)

Qatar Campus Contact

Kathleen Hewett-Smith, Senior Associate Dean and Chief Academic Officer

Phone: +974 4454 5059

Email: [kathleen.hewett-smith@northwestern.edu](mailto:kathleen.hewett-smith@northwestern.edu)

Under Northwestern policy, all University employees (including student employees), as well as graduate students with teaching or supervisory authority, are obligated to promptly report sexual misconduct of which they become aware in the scope of their work for the University to the Office of Equity. The Confidential Resources listed above are not subject to this reporting requirement.

## 6. Support Services

Support services are individualized measures offered as appropriate to either or both the reporting and responding parties involved in an incident of sexual misconduct, prior to an investigation or while an investigation is pending. Support services include counseling, extensions of time or other course-related adjustments, modifications of work or class schedules, campus escort services, restrictions on contact between the parties, changes in work or housing locations, leaves of absence, increased security and monitoring of certain areas of campus, and other similar accommodations.

Support services will be individualized and appropriate based on the information gathered by the Office of Equity, making every effort to avoid depriving any student of their education. The measures needed by each party may change over time, and the Office of Equity will communicate with parties throughout an investigation to ensure that any interim measures are necessary and effective based on the parties' evolving needs.

As noted above, an individual may request to receive support – including the measures mentioned in this section – even if they do not choose to participate in the University's Complaint Resolution Process.

## 7. Preserve Evidence

Northwestern encourages individuals who have experienced sexual misconduct to preserve evidence to the greatest extent possible as this may preserve more options for them in the future. Below are suggestions for preserving evidence related to an incident of sexual misconduct.

Outside of Qatar, a forensic rape exam is a consideration for many survivors of sexual violence. Within the State of Qatar, it is a possible consideration for survivors of sexual violence.

**In the State of Qatar, forensic evidence for a conviction of rape may require that there was resistance, i.e. skin of the perpetrator under the fingernails, bruises. If there is no evidence of a struggle, then an incident may not be classified as rape under Qatar law and the survivor may be accused of sex outside of marriage, which is illegal in the State of Qatar.**

It is important to keep in mind that each suggestion may not apply in every incident:

Preserve evidence of electronic communications like text messages, pictures, and/or social networking pages by saving them and/or taking screen shots.

If there is a suspicion that a drink may have been drugged, inform a medical assistance provider and/or police as soon as possible so they can collect evidence (e.g. from the drink, through urine or blood sample).

Because evidence that may be located on the body can dissipate quickly, consider going to a hospital or medical facility immediately to seek a medical exam. If possible, do not shower, brush teeth, or eat before going to the hospital or seeking medical attention, and do not washclothes or bedding.

Attachment B:

Northwestern's Interim Policy on Title IX Sexual  
Harassment



**Approving University Officials:** Provost; Executive Vice President  
**Responsible Office:** Provost; Human Resources; Student Affairs; Office of Equity  
**Effective Date:** September 7, 2022  
**Next Review Date:** September 1, 2023

**INTERIM POLICY ON TITLE IX SEXUAL HARASSMENT**

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## I. Policy

### A. Policy Statement

On May 6, 2020, the United States Department of Education issued new regulations, effective August 14, 2020, defining sexual harassment under Title IX of the Education Amendments of 1972 (“Title IX”) to include three categories of misconduct on the basis of sex that occur within the University’s education programs or activities: *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.

While Northwestern prohibits all forms of discrimination and harassment, including sexual misconduct, this policy applies only to Sexual Harassment under Title IX as defined below. Discriminatory and/or harassing conduct falling outside of the purview of this policy is addressed under the University’s Policy on Institutional Equity. Other forms of misconduct may be addressed by other Northwestern policies (e.g. Student Handbook, Faculty Handbook, and Staff Handbook).

### B. Jurisdiction

This policy applies to Title IX Sexual Harassment as defined below that occurs in the University’s Education Programs or Activities and that is committed by any student, faculty member, staff member, or third-party affiliate who has a formal (including contractual) relationship with the University community. As defined by the U.S. Department of Education, the University’s Education Programs or Activities include locations, events, or circumstances in the United States in which Northwestern exercised substantial control over both the Respondent (the person accused of violating the policy) and the context in which the alleged violation occurred (including any building owned or controlled by a student organization that is officially recognized by Northwestern).

Misconduct occurring outside of the jurisdiction of this policy may be addressed by other University policies, which may include but are not necessarily limited to the University’s Policy on Institutional Equity. **Individuals impacted by any form of sexual misconduct, irrespective of whether it falls under this policy, may contact the Office of Equity to receive support, resources, and information.**

This policy does not apply to Sexual Harassment committed by visitors or guests to the University, or to Sexual Harassment that occurs outside the geographic boundaries of the United States, even if the Sexual Harassment occurs in the University’s Education Programs or Activities, such as a study abroad program. Sexual Harassment that occurs outside the geographic boundaries of the United States is governed by the University’s Policy on Institutional Equity.

Pursuant to guidance from the U.S. Department of Education, this policy applies to Title IX Sexual Harassment alleged to have occurred on or after August 14, 2020. Allegations of conduct occurring prior to this date will be subject to the University policy in place at the time of the alleged conduct.

**Individuals impacted by Title IX Sexual Harassment may contact the Office of Equity to receive support, resources, and information even if they do not wish to move forward with**

**the Complaint Resolution Process described in Section III below.**

**C. Purpose**

Northwestern is committed to fostering an environment in which all members of our community are free from sexual misconduct in any form. The University expects that all interpersonal relationships and interactions—especially those of an intimate nature—will be based on mutual respect, open communication, and clear consent. Additionally, Northwestern is committed to complying with Title IX of the Education Amendments of 1972 and its implementing regulations, the Violence Against Women Reauthorization Act of 2013, and the Illinois Preventing Sexual Violence in Higher Education Act.

**D. Accessibility**

The Office of Equity is committed to making our services accessible to all members of the Northwestern community. The Office is cognizant of the physical accessibility of our space, the cultural competency of our staff, and the method and tone of the services we provide. Accessibility includes but is not limited to: providing reasonable accommodations to persons with disabilities, including mental health concerns, ensuring our online resources are accessible, providing translation services, and providing competent, respectful, and effective service to people of all identities and expressions. To request an accommodation related to the University’s Title IX Sexual Harassment policy or procedure, or to discuss any questions or concerns about the accessibility of the Office of Equity’s services or resources, please contact the Title IX Coordinator.

**E. Definitions**

The following terms and definitions are important components of this policy. The definitions are intended to give meaning to these terms in the context of Northwestern’s policy. Criminal and other applicable state laws may use different definitions of these terms.<sup>1</sup>

**1. Consent**

Consent represents the cornerstone of respectful and healthy intimate relationships. Northwestern expects 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 initiating a new type of sexual activity within an encounter to ensure that consent is present before acting and that consent is ongoing during sexual activity.

**Capacity to consent**

Consent is not present when an individual does not have the capacity to give consent, voluntarily or involuntarily, due to age (generally, the age of consent is

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<sup>1</sup> Information on the applicable state law definitions in Illinois, Florida, California, New York and Washington, D.C. can be found at <https://www.northwestern.edu/sexual-misconduct/title-IX/relevant-laws.html>

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.

"Incapacitated" refers to the state where a person does not understand the nature or fact of sexual activity due to the effect of drugs or alcohol consumption, medical condition or disability, or due to a state of unconsciousness or sleep.

**When alcohol is involved, incapacitation is a state beyond drunkenness or intoxication. When drug use is involved, incapacitation is a state beyond being under the influence or impaired by use of the drug.** Alcohol and other drugs impact each individual differently, and determining whether an individual is incapacitated requires an individualized determination.

Some indicators of incapacitation 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, slurred speech, difficulty finding words).

A person may appear to be giving consent but may not have the capacity to do so. **When determining whether a person has the capacity to provide consent, the University will consider whether a sober, reasonable person in the same position knew or should have known whether the other party could or could not consent to the sexual activity.** It is especially important, therefore, that anyone initiating sexual activity is aware of their own level of intoxication as it may impact their ability to assess another person's 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.

### **Aspects of Valid Consent**

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

Consent must be all of the following:

- **Knowing:** All individuals understand, are aware of, and agree as 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 Respondent’s intimidation (extortion, menacing behavior, bullying), coercion (severe or persistent pressure causing fear of significant consequences from Respondent if one does not engage in sexual activity), force (violence, physical restraint, or the presence of a weapon), threats (indications of intent to harm, whether direct or indirect), 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 to engage in sexual activity with one person does not constitute consent to engage in sexual activity with another person.

Consent may also be withdrawn at any time, provided the person withdrawing consent makes that known in clearly understandable words or actions.

## 2. Prohibited Conduct

Northwestern prohibits all forms of sexual misconduct. Such conduct violates our community values and disrupts the living, learning, and working environment for students, faculty, staff, and other community members. Consistent with the U.S. Department of Education’s implementing regulations for Title IX and the Illinois Preventing Sexual Violence in Higher Education Act, the University prohibits Title IX Sexual Harassment that occurs within its Education Programs and Activities. As further defined below, Title IX Sexual Harassment includes Quid Pro Quo Sexual Harassment, Hostile Environment Sexual Harassment, Sexual Assault, Domestic Violence, Dating Violence, and Stalking. Conduct that is not covered by this policy may be addressed by other University policies, including but not necessarily limited to the University’s Policy on Institutional Equity. An act may violate one or more parts of this policy or one or more University policies.

**a. Title IX Sexual Harassment:** Conduct on the basis of sex that satisfies one or more of the following:

- i. **Quid Pro Quo Sexual Harassment:** An employee of Northwestern conditioning the provision of an aid, benefit, or service of the University on an individual’s participation in unwelcome sexual conduct.

- ii. **Hostile Environment Sexual Harassment:** Unwelcome conduct on the basis of sex determined by a reasonable person to be so severe, pervasive, and objectively offensive that it effectively denies a person equal access to Northwestern’s Education Program or Activity.
- iii. **Title IX Sexual Assault:** Title IX Sexual Assault as defined in 20 U.S.C. 1092(f)(6)(A)(v). Under 20 U.S.C. 1092(f)(6)(A)(v), the term “sexual assault” means an offense classified as a forcible or nonforcible sex offense under the uniform crime reporting system of the Federal Bureau of Investigation. The Uniform Crime Reporting System includes the following offenses as forcible or nonforcible sex offenses:
  - **Rape:** The penetration, no matter how slight, of the vagina or anus with any body part or object or instrument, or oral penetration by a sex organ of another person, without the consent of the victim or where the victim is incapable of giving consent, including instances where the victim is incapable of giving consent because of their age or because of their temporary or permanent mental or physical incapacity. Attempted rape is included. An “object” or “instrument” is anything used by the offender other than the offender’s genitalia.
  - **Fondling:** The touching of the private body parts of another person for the purpose of sexual gratification, without the consent of the victim, including instances where the victim is incapable of giving consent because of their age or because of their temporary or permanent mental incapacity.
  - **Incest:** Non-forcible sexual intercourse between persons who are related to each other within the degrees wherein marriage is prohibited by law.
  - **Statutory Rape:** Non-forcible sexual intercourse with a person who is under the statutory age of consent.
- iv. **Title IX Dating Violence:** “dating violence” as defined in 34 U.S.C. 12291(a)(10). Under 34 U.S.C. 12291(a)(10), 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.
- v. **Title IX Domestic Violence:** “domestic violence” as defined in 34 U.S.C. 12291(a)(8).

Under 34 U.S.C. 12291(a)(8), the term “domestic violence” includes felony or misdemeanor crimes of violence committed by a current or former spouse or intimate partner of the victim, by a person with whom the victim shares a child in common, by a person who is cohabitating with or has cohabitated with the victim as a spouse or intimate partner, by a person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction receiving grant monies, or 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 of the jurisdiction.

vi. **Title IX Stalking:** “stalking” as defined in 34 U.S.C. 12291(a)(30).

Under 34 U.S.C. 12291(a)(30), the term “stalking” means engaging in a course of conduct directed at a specific person that would cause a reasonable person to—

(A) fear for their safety or the safety of others; or

(B) suffer substantial emotional distress.

### 3. **Participants**

*Complainant* means an individual who is alleged to be the victim of conduct that could constitute Title IX Sexual Harassment under this policy.

*Respondent* means an individual who has been reported to be the perpetrator of conduct that could constitute Title IX Sexual Harassment under this policy.

*Parties* is a term that refers to the Complainant and Respondent collectively.

### 4. **Supportive Measures**

*Supportive Measures* are non-disciplinary, non-punitive individualized services offered as appropriate, as reasonably available, and without fee or charge to the Complainant or the Respondent before or after the filing of a Formal Complaint or where no Formal Complaint has been filed. Such measures are designed to restore or preserve equal access to the University’s Education Programs or Activities without unreasonably burdening the other party, including measures designed to protect the safety of all parties or the University’s educational environment, or deter Title IX Sexual Harassment. Supportive Measures may include counseling, extensions of deadlines or other course-related adjustments, modifications of work or class schedules, campus escort services, mutual restrictions on contact between the parties, changes in work or housing locations, leaves of absence, increased security and monitoring of certain areas of the campus, other changes to academic, living, dining, transportation, and working situations, honoring an order of protection or no contact order entered by a State civil or criminal court, and other similar measures. In providing Supportive Measures, the Office of Equity will make every effort to avoid depriving any student of their education or access to the University’s program or activities. The

Supportive Measures needed by each party may change over time, and the Office of Equity will communicate with parties to ensure that any Supportive Measures in place are necessary and effective based on the parties' evolving needs.

The University will maintain the confidentiality of Supportive Measures provided to either a Complainant or Respondent, to the extent that maintaining such confidentiality does not impair the University's ability to provide the Supportive Measures in question. As noted above, an individual may request to receive support – including the Supportive Measures mentioned in this section – even if they do not choose to participate in the University's Complaint Resolution Process.

## 5. **Formal Complaint**

A *Formal Complaint* is a document filed by a Complainant or signed by the Title IX Coordinator alleging Title IX Sexual Harassment against a Respondent and requesting that Northwestern investigate the allegation of Title IX Sexual Harassment. **In order for Northwestern to proceed to an investigation, at the time of filing a Formal Complaint, a Complainant must be participating in or attempting to participate in Northwestern's Education Programs or Activities (see I(B), above).** A "document filed by a Complainant" means a document or electronic submission (such as an email) that contains the Complainant's physical or electronic signature or otherwise indicates that the Complainant is the person filing the Formal Complaint.

## F. **Reporting**

### 1. **Title IX Sexual Harassment Reporting Options**

The University encourages reporting of Title IX Sexual Harassment. Members of the University community who believe they have experienced Title IX Sexual Harassment have the right to choose whether or not to report the incident to the University, law enforcement, or both, and have the right to choose whether to engage with the University once the University receives a report. The information below is for individuals who wish to report incidents of Title IX Sexual Harassment. Reporting Title IX Sexual Harassment in the manners set forth below is not equivalent to filing a "Formal Complaint of Title IX Sexual Harassment" as defined above. Information on how to file a Formal Complaint can be found in the Complaint Resolution Process described in Section III below.

Information regarding reporting options and procedures for incidents of sexual misconduct that are not covered by this policy can be found in the Policy on Institutional Equity available at:

<https://www.northwestern.edu/equity/documents/policy-on-institutional-equity.pdf>

### **Reporting Incidents to the University**

Any individual may report Title IX Sexual Harassment to the Title IX Coordinator. Reports may be made in person, by email, by regular mail, by

phone, or electronically as explained below, or by any other means that results in the Title IX Coordinator receiving the person's verbal or written report. In-person reports must be made during normal business hours, but reports can be made by regular mail, telephone, or electronic mail at any time, including outside normal business hours.

**Individuals impacted by Title IX Sexual Harassment may contact the Office of Equity to receive support, resources, and information even if they do not wish to move forward with the Formal Complaint Resolution Process described in Section III below.** Please see section III for more information. To speak to someone confidentially without making a report to the University, please see the Confidential Resources listed in Section II(A) below.

While anonymous reports will be reviewed by the Office of Equity, the University's ability to address Title IX Sexual Harassment reported by anonymous sources is significantly limited.

There is no time limit for reporting an incident of Title IX Sexual Harassment. However, in order for Northwestern to proceed to an investigation, at the time of filing a Formal Complaint, a Complainant must be participating in or attempting to participate in Northwestern's Education Programs or Activities. The University encourages reports be made as soon as possible after the incident.

The staff identified below are specially trained to work with individuals who report or are accused of Title IX Sexual Harassment and have knowledge about on- and off- campus resources, services, and options—including the availability of supportive measures, as discussed above in Section I(E)(4).

#### **Interim Title IX Coordinator**

Contact: Jessica Galanos

Location: Office of Equity, 1800 Sherman, Suite 4-500, Evanston, IL 60208

Phone: (847) 467-6165

Email: [jessica.galanos@northwestern.edu](mailto:jessica.galanos@northwestern.edu)

Email: [equity@northwestern.edu](mailto:equity@northwestern.edu)

#### **To File a Report Electronically**

Individuals may use the form at the following link to electronically file a report of Title IX Sexual Harassment with the Office of Equity:

<https://bit.ly/NUReportSexualMisconduct>

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

#### **Other University Reporting Options**

##### **EthicsPoint**

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

Phone: (866) 294-3545

Website: <https://www.northwestern.edu/risk/compliance/report-a-concern/ethicspoint.html>

Upon receipt of a report, an Office of Equity staff member will contact the person who may have experienced Title IX Sexual Harassment. The outreach from the Office of Equity staff member will generally include information about: medical and confidential counseling and support resources; options for filing a Formal Complaint and/or reporting the incident to law enforcement; how to request a protective order or no-contact directive; how to request Supportive Measures from the University with or without filing a Formal Complaint; how to preserve evidence; and where to access more information. The outreach will also include an invitation to meet with or provide additional information to an Office of Equity staff member.

### **Reporting Incidents to Law Enforcement**

An individual who has experienced Sexual Assault, Dating Violence, Domestic Violence, or Stalking has the right to choose whether to file a police report. Northwestern University encourages individuals to report such incidents to University Police or local law enforcement. Filing a police report can result in the investigation of whether sexual violence or related crimes occurred and the prosecution of the perpetrator. Timely reporting to the police is an important factor in successful investigation and prosecution of crimes, including sexual violence.

**The Office of Equity can provide information on contacting local and campus law enforcement and can assist an individual in doing so. However, the Office of Equity will not compel an individual to go to law enforcement.**

The Northwestern University Police has a written [statement](#) for individuals who report Sexual Assault/Sexual Violence, Domestic Violence, Dating Violence, or Stalking (<http://www.northwestern.edu/up/your-safety/sexual-violence/university-police-guarantee.html>) that reflects its commitment to sensitivity and privacy. University Police can also assist in reviewing options with individuals who report such conduct and identifying and facilitating resources related to:

- Seeking medical attention;
- Seeking support, advocacy, and counseling services;
- Seeking protective orders from a court;
- Pursuing options under the University's investigation process.

Employees of the University Police are University employees and therefore are obligated to promptly report incidents of Title IX Sexual Harassment of

which they become aware during the scope of their work as explained below. Employees of the University Police will make reports to the Office of Equity regardless of whether the individual who experienced the Title IX Sexual Harassment 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: <https://www.northwestern.edu/up/>

### **Evanston Police Department**

Evanston Campus: 1454 Elmwood Avenue, Evanston  
Phone: 911 or (847) 866-5000 (24 hours)  
Website: <https://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: <https://www.chicagopolice.org/about/police-districts/18th-district-near-north/>

## **2. Reporting Obligations**

### **Sexual Misconduct**

*All University employees (including student employees) and graduate students with teaching or supervisory authority, are obligated to promptly report sexual misconduct (including Title IX Sexual Harassment) of which they become aware in the scope of their work for the University to the Office of Equity unless they are a Confidential Resource listed in Section II(A). Note: This does not require a person experiencing harm to report the incident.* Failure to fulfill this reporting obligation will be referred to the appropriate office for corrective action. The University encourages all individuals – including students not referenced above – to report sexual misconduct (including Title IX Sexual Harassment) of which they become aware to the Office of Equity.

### **Incidents Involving Minors**

As stated in the University's [Policy on Minors at Northwestern](#), all University employees, students, volunteers, and third-party contractors are obligated to report to the Illinois Department of Children & Family Services or applicable state agency (as well as University Police, in emergency situations) any suspected abuse and/or neglect of a child. This includes any and all incidents of sexual misconduct (including Title IX Sexual

Harassment) involving minors, which should be reported to the Office of Equity as well. Reporters should also advise their supervisor (if the reporter is an employee) or the Dean of Students (if the reporter is a student), as well as notifying the Office of Risk Management and the Office of Compliance, Audit, and Advisory Services in writing that a report has been made.

### **3. Interim Removal**

At any time after receiving a report of Title IX Sexual Harassment, the University may remove a student Respondent from the University's Education Programs and Activities on an emergency basis if an individualized safety and risk analysis determines that an immediate threat to the physical health or safety of any student or other individual arising from the allegations of Title IX Sexual Harassment justifies removal. In the event the University imposes an interim removal, it will provide the Respondent with notice and an opportunity to challenge the removal decision immediately following the removal. Any emergency removal of a student will involve consultation with the Behavioral Consultation Team and the Division of Student Affairs.

In the case of a Respondent who is a non-student employee, and in the University's discretion, the University may place the Respondent on administrative leave at any time after receiving a report of Title IX Sexual Harassment, including during the pendency of the investigation and hearing process. The decision to place a non-student employee on administrative leave will be made by the employee's unit director and the Office of the Provost (for faculty Respondents) or Human Resources (for staff Respondents) upon recommendation of the Office of Equity.

For all other Respondents, including third-party affiliates and guests, the University retains broad discretion to prohibit such persons from entering onto its campus and other properties at any time, and for any reason, whether after receiving a report of Title IX Sexual Harassment or otherwise.

### **4. Title IX Retaliation**

Neither Northwestern nor any other person may intimidate, threaten, coerce, or discriminate against any individual for the purpose of interfering with any right or privilege secured by Title IX and its implementing regulations or this policy, or because the individual has, in good faith, made a report or complaint, testified, assisted, or participated or refused to participate in any manner in an investigation, proceeding, or hearing under this policy. Intimidation, threats, coercion, or discrimination, including charges against an individual for code of conduct violations that do not involve sex discrimination or sexual harassment, but arise out of the same facts or circumstances as a report or complaint of sex discrimination, or a report or Formal Complaint of Title IX Sexual Harassment, for the purpose of interfering with any right or privilege secured by Title IX or this policy, constitutes Title IX Retaliation under this Policy. A detailed definition of retaliation and examples of retaliatory conduct are provided in the [University's Policy on Non-Retaliation](#).

Complaints of Title IX Retaliation may be made by contacting the Title IX

Coordinator. The University will process any report or complaint of Title IX Retaliation in the same manner as a report or complaint of sex discrimination under the University's Policy on Institutional Equity. Individuals who are found to have engaged in Title IX Retaliation as defined by this policy are subject to disciplinary action that may include, but is not limited to, the sanctions listed in Section I(G). The University retains discretion to consolidate a Formal Complaint of Title IX Retaliation with a Formal Complaint of Title IX Sexual Harassment for investigation and/or adjudication purposes.

**5. Amnesty for Title IX Sexual Harassment Complainants and Witnesses**

Northwestern encourages reporting of Title IX Sexual Harassment and seeks to remove any barriers to making a report. The University recognizes that an individual who has been consuming alcohol (including underage consumption) or using drugs at the time of an incident may be hesitant to make a report because of potential consequences for that conduct. To encourage reporting, an individual who makes a good faith report of Title IX Sexual Harassment that was directed at them or another person, or participates in an investigation as a witness, will not be subject to disciplinary action by the University for a conduct or policy violation that is related to and revealed in the sexual misconduct report or investigation, unless the University determines that the violation was serious and/or placed the health or safety of others at risk. Amnesty does not preclude or prevent action by police or other legal authorities. This Amnesty provision may also apply to student groups making a report of Title IX Sexual Harassment.

**6. Free Expression and Academic Freedom**

Northwestern is firmly committed to free expression and academic freedom. The University is equally committed to creating and maintaining a safe, healthy, and harassment-free environment for all members of its community, and firmly believes 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 Title IX Sexual Harassment or retaliation that involve an individual's statements or speech.

**7. Title IX and VAWA Statement**

It is the policy of Northwestern to comply with Title IX of the Education Amendments of 1972 and its implementing regulations (and all other applicable laws regarding unlawful discrimination and harassment including, but not limited to, Title VII of the Civil Rights Act of 1964 and the Illinois Human Rights Act), which prohibits discrimination (including sexual harassment and sexual violence) based on sex in the University's educational programs and activities. It is also Northwestern's policy to comply with the Jeanne Clery Disclosure of Campus Security Policy and Campus Crimes Statistics Act, as amended by the Violence Against Women Act. Title IX prohibits retaliation for asserting or otherwise participating in claims of sex discrimination. VAWA imposes additional duties

on universities and colleges to investigate and respond to reports of sexual assault, stalking, and dating or domestic violence, and to publish policies and procedures related to the way these reports are handled.

Northwestern has designated the Title IX Coordinator, with assistance of the Deputy Title IX Coordinators, to coordinate Northwestern's compliance with Title IX and VAWA and to respond to reports of violations. The University has directed its Clery Program Manager to coordinate Northwestern's compliance with the Clery reporting related VAWA requirements. 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](http://www2.ed.gov/about/offices/list/ocr/complaintintro.html) or calling 1-800- 421-3481.

Employees may also file a charge with the Equal Employment Opportunity Commission regarding an alleged violation of Title VII by calling 1-800-669-4000 or visiting <https://www.eeoc.gov/employees/howtofile.cfm>. Employees may also file a charge with the Illinois Department of Human Rights (IDHR) regarding an alleged violation of the Illinois Human Rights Act by calling 1-800-662-3942 or 1-866-740-3953 (TTY). In addition, after the IDHR has completed its investigation of the complaint, an appeal process is available through the Illinois Human Rights Commission, which can be contacted by calling 312-814-6269 or 312-814-4760 (TTY).

## **G. Potential Consequences Following a Finding of a Policy Violation**

### **1. Sanctions**

When a final determination is made that an individual has violated this policy, as determined by the Complaint Resolution Process in Section III, the appropriate sanctions are determined based on several factors, including the severity of the conduct and any prior policy violations. Sanctions and corrective actions can include, but are not limited to:

- Verbal warning
- Written warning
- Advisory letter
- Conduct review
- Disciplinary hold on academic and/or financial records
- Performance improvement/management process
- Required counseling or coaching
- Required training or education
- Campus access restrictions
- Referral to the Fitness for Duty process
- No trespass order issued by NUPD (with respect to campus locations)

- No-contact directive (with respect to an individual)
- Loss of privileges
- Loss of title and/or honors
- Loss of oversight, teaching or supervisory responsibility
- Probation
- Demotion
- Loss of pay increase
- Decrease in pay
- Transfer (employment)
- Revocation of offer (employment or admissions)
- Disciplinary suspension
- Suspension with pay
- Suspension without pay
- Expulsion
- Termination of employment
- Revocation of tenure
- Termination of contract (for contractors)

The University may assign other sanctions as appropriate in each particular situation. Sanctions and corrective actions will be imposed in accordance with relevant policies and/or procedures and other requirements set forth in the applicable Staff Handbook, Faculty Handbook, Student Handbook, other policies or handbooks that may be developed over time, or contracts. In addition to imposing sanctions, the University may take steps to remediate the effects of a violation on the impacted parties and others.

## **2. Remedies**

*Remedies* refers to measures provided to a Complainant where a determination of responsibility for Title IX Sexual Harassment has been made against the Respondent. After a final decision is made that an individual has violated this policy as determined by the Complaint Resolution Process in Section III, the University may also offer additional measures, and/or take other action, to eliminate any hostile environment caused by the Title IX Sexual Harassment, prevent the recurrence of any Title IX Sexual Harassment, and remedy the effects of the Title IX Sexual Harassment on the Complainant and the University community. Remedies will be provided to persons who have experienced Title IX Sexual Harassment as reasonably necessary to restore or preserve access to the University's Education Programs or Activities. Remedies that may be offered or provided to a Complainant may include counseling, extensions of deadlines or other course-related adjustments, modifications of work or class schedules, campus escort services, mutual restrictions on contact between the parties,

changes in work or housing locations, leaves of absence, increased security and monitoring of certain areas of the campus, other changes to academic, living, dining, transportation, and working situations, honoring an order of protection or no contact order entered by a State civil or criminal court, and other similar measures. The University may provide other remedies as appropriate in each particular situation. However, remedies need not be non-disciplinary or non-punitive and need not avoid burdening the Respondent.

## **H. Related Information**

### **1. University policies and procedures**

[Policy on Institutional Equity](#)

[Faculty Handbook](#)

[Non-Retaliation](#)

[Policy on Minors at Northwestern](#)

[Policy on Consensual Romantic or Sexual Relationships between Faculty, Staff and Students](#)

[Staff Handbook](#)

[Student Handbook](#)

### **2. Other information**

[Department of Education Office for Civil Rights complaint forms](#)

[EthicsPoint](#)

[Resource Guide on Title IX Sexual Harassment](#)

[Resource Guide for Respondents in Title IX Sexual Harassment Matters](#)

[Sexual Misconduct Response & Prevention resource page](#)

[University Police Annual Security & Fire Safety Report](#)  
[University Police Guarantee for Sexual Assault Victims](#)

## **I. History**

This policy was enacted on August 14, 2020 and updated on September 1, 2021 and September 1, 2022.

**Policy URL:** <https://www.northwestern.edu/equity/documents/interim-policy-on-title-ix.pdf>

## **II. Resources<sup>2</sup>**

### **A. Confidential Support, Advocacy, and Counseling Resources**

The following Confidential Resources are available for individuals to discuss incidents and issues related to Title IX Sexual Harassment on a confidential basis. Confidential

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<sup>2</sup> For additional information, see Northwestern's [Resource Guide on Title IX Sexual Harassment](http://www.northwestern.edu/equity/documents/interim-policy-on-title-ix.pdf) (<http://www.northwestern.edu/sexual-misconduct/docs/TitleIXResourceGuide.pdf>). Print copies are available by contacting the Office of Equity, at (847) 467-6165.

Resources are not obligated to disclose reports of Title IX Sexual Harassment to the Title IX Coordinator for the University (under any circumstance) or law enforcement (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 as otherwise required by law).

Confidential Resources can provide information about University and off-campus resources, support services and other options. As noted above, because of the confidential nature of these Resources, disclosing information to or seeking advice from a Confidential Resource does not constitute making a report or complaint to the University and will not result in a response or intervention by the University. A person consulting with a Confidential Resource may later decide to make a report to the University and/or law enforcement.

The Medical Resources in Section II(B) are also Confidential Resources and are not obligated to disclose reports of Title IX Sexual Harassment to the Title IX Coordinator for the University (under any circumstance) or law enforcement (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 as otherwise required by law).

### **On-Campus Confidential Resources**

<b>Resource</b>	<b>Contact Information</b>	<b>Description</b>
<b>CARE: Center for Awareness, Response &amp; Education</b> <sup>3,4*</sup>	<b>Evanston Campus:</b> 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>	CARE is a confidential space for students impacted by sexual violence, relationship violence, or stalking, including friends or partners of survivors. CARE can be an advisor through the University complaint resolution process. Advocates can provide a space to process, ask questions, safety plan, and learn more about the impact of trauma. CARE also hosts a trauma support group and can connect with legal and medical advocacy, free counseling, and support groups on and off campus
<b>CAPS: Counseling and Psychological Services*</b>	<b>Evanston Campus:</b> 633 Emerson Street, 2nd Floor (847) 491-2151 (24-hours)  <b>Chicago Campus:</b>	Provides counseling services to students, also provides a counselor on call 24 hours a day.

<sup>3</sup> CARE is designated as the University’s confidential advisor under the Illinois *Preventing Sexual Violence in Higher Education Act*.

<sup>4</sup> \* Note: Some staff and faculty may be confidential resources in some aspect of their work for the University (e.g. physicians), but are subject to the University’s reporting obligation for information learned in connection with their work for the University outside of a confidential relationship. For example, physicians are confidential resources with respect to information shared with them by patients, but are obligated to report sexual misconduct of which they become aware through work not related to patient care, such as work in labs, classrooms, or student advising.

	Abbott Hall, 5th Floor 710 N. Lake Shore Drive (847) 491-2151 (24-hours) <a href="http://www.northwestern.edu/counseling/">www.northwestern.edu/counseling/</a>	
<b>Religious &amp; Spiritual Life</b>	<b>Evanston Campus:</b> 1870 Sheridan Road (847) 491-7256 <a href="mailto:spiritual.life@northwestern.edu">spiritual.life@northwestern.edu</a> <a href="http://www.northwestern.edu/religious-life/">www.northwestern.edu/religious-life/</a>	Provides spiritual guidance for students and other members of the University community.
<b>Faculty Wellness Program*</b>	Director Gaurava Agarwal, MD <a href="mailto:gagarwal@nm.org">gagarwal@nm.org</a> <a href="mailto:rcarroll@nm.org">rcarroll@nm.org</a> <a href="https://www.northwestern.edu/provost/faculty-resources/work-life/well-being-resources/faculty-wellness.html">https://www.northwestern.edu/provost/faculty-resources/work-life/well-being-resources/faculty-wellness.html</a>	Provides free consultations for faculty members to identify appropriate resources for personal and professional concerns. Resources may be offered over the phone, or faculty members can meet with the Faculty Wellness Program director for further discussion.
<b>Employee Assistance Program</b>	(855) 547-1851 (24 hours) <a href="https://www.northwestern.edu/hr/benefits/well-being/programs/employee-assistance-program/index.html">https://www.northwestern.edu/hr/benefits/well-being/programs/employee-assistance-program/index.html</a>	Provides confidential crisis intervention and short-term counseling for faculty and staff, as well as their household family members at no cost.
<b>Office of the Ombudsperson</b>	<b>Evanston Campus:</b> <a href="mailto:ombuds@northwestern.edu">ombuds@northwestern.edu</a> <a href="https://www.northwestern.edu/ombuds/">https://www.northwestern.edu/ombuds/</a>	Provides confidential and informal assistance for resolving university-related concerns, is independent of the university's formal administrative structure, and considers all sides of an issue in a neutral manner.

**Off-Campus Confidential Resources**

<b>Resource</b>	<b>Contact Information</b>	<b>Description</b>
<b>Hotlines</b>	<p>Chicago Metro Rape Crisis Hotline (YWCA): (888) 293-2080</p> <p>Chicago Domestic Violence Line: (877) 863-6338</p> <p>Evanston Domestic Violence Line (YWCA): (877) 718-1868</p> <p>RAINN: Rape, Abuse &amp; Incest National Network (800) 656-HOPE  <a href="https://hotline.rainn.org/">https://hotline.rainn.org/</a> (online hotline)</p>	<p>All hotlines provide 24 hour (7 days/week) crisis counseling and information regarding sexual assault, dating violence, and stalking. Survivors and friends of survivors can call.</p> <p><i>Note: the hotlines can also provide information on local hospitals, such as what hospitals will have a victim advocate or SANE (Sexual Assault Nurse Examiner) available.</i></p>
<b>Center on Halsted (LGBTQ Services)</b>	<p>3656 N. Halsted St, Chicago (7 days a week, 8 a.m. to 9 p.m.)</p> <p>LGBTQ Violence Resource Line: (773) 472-6469  <a href="http://www.centeronhalsted.org/avp">http://www.centeronhalsted.org/avp</a></p>	<p>Services include: counseling services; connecting individuals with professional help, law enforcement, agencies, services, and other providers.</p>
<b>in*power (LGBTQ Survivor Support Services)</b>	<p>4025 N. Sheridan Rd, Chicago (773) 388-1600 ext 3680  <a href="mailto:in.power@howardbrown.org">in.power@howardbrown.org</a>  <a href="http://www.howardbrown.org/inpower/">http://www.howardbrown.org/inpower/</a></p>	<p>Services include: STI testing and treatment, short-term case management, linkage to community resources, holistic health referrals, support groups for young people and adults, legal advocacy</p>
<b>Resilience (Formerly known as Rape Victim Advocates)</b>	<p>Main Office:            180 N. Michigan Ave, Suite 600, Chicago (312) 443-9603  <a href="http://www.ourresilience.org">www.ourresilience.org</a></p>	<p>Services include: medical and legal advocacy, counseling services (individual and group). Services are free for survivors or friends/partners of survivors.</p>
<b>YWCA- Evanston</b>	<p>1215 Church St, Evanston (847) 864-8445  <a href="https://www.ywca-ens.org">https://www.ywca-ens.org</a></p>	<p>Services include: counseling and support for survivors of dating/domestic violence, legal advocacy, and residential services (emergency shelter)</p>
<b>Life Span Center for Legal Services and Advocacy</b>	<p>70 E. Lake Street, Suite 600, Chicago (312) 408-1210  <a href="mailto:life-span@life-span.org">life-span@life-span.org</a>  <a href="http://www.life-span.org">www.life-span.org</a></p>	<p>Services include (for survivors of DV, SV, and stalking): legal services, legal advocacy (i.e. assistance with Orders of Protection, etc.), and counseling</p>
<b>Center for Contextual Change</b>	<p>9239 Gross Point Road #300, Skokie (847) 676-4447 x304 (for appointments or a confidential assessment)  <a href="http://www.centerforcontextualchange.org">www.centerforcontextualchange.org</a></p>	<p>Referrals for survivors of sexual and domestic/dating violence: individual and group counseling.</p> <p>Referrals for perpetrators of sexual and domestic/dating violence: individual and group counseling</p>

<b>Apna Ghar</b>	4350 North Broadway, 2 <sup>nd</sup> Floor Chicago, IL 60613 (773) 334-4663 <a href="http://www.apnaghar.org">www.apnaghar.org</a>	Services include: 24/7 crisis line, legal advocacy, counseling, emergency shelter
<b>Mujeres Latinas en accion</b>	2124 West 21 <sup>st</sup> Place Chicago, IL 60608 (773) 890-7676 <a href="http://www.mujereslatinasenaccion.org">www.mujereslatinasenaccion.org</a>	Services include: counseling, legal advocacy, medical advocacy
<b>Greenlight Family Services (Formerly Porchlight Counseling Services)</b>	(773) 750-7077 confidential helpline and intake <a href="http://greenlightfamilyservices.org/services/counseling">http://greenlightfamilyservices.org/services/counseling</a>	Services include: free counseling for survivors of sexual and/or domestic/dating violence
<b>KAN-WIN</b>	Offices in Chicago and Park Ridge (773) 583-1392 (Chicago) (847) 299-1392 (Park Ridge) 24-hour Hotline: (773) 583-0880 <a href="http://www.kanwin.org">www.kanwin.org</a>	Services include: (multi-lingual) free counseling, legal advocacy (assistance with protective orders/court accompaniment), and immigration protection for Asian-American or Asian immigrant survivors of sexual and/or domestic violence.
<b>DC Rape Crisis Center</b>	PO Box 42734 Washington, DC 20015 Business: 202-232-0789 TTY: 202-328-1371 Hotline: 202-333-7273 <a href="http://dcrcc.org/">http://dcrcc.org/</a>	Services include: Individual & group counseling (English and Spanish); a 24-hour crisis hotline; community education & outreach
<b>Network for Victim Recovery of DC</b>	6955 Willow St. NW #501 Washington, DC 20012 (202) 742-1727 <a href="mailto:info@nvrdc.org">info@nvrdc.org</a> <a href="http://nvrdc.org">http://nvrdc.org</a>	Services include: free case management and legal services to victims of crime
<b>M.U.J.E.R. (Miami)</b>	27112 South Dixie Highway Naranja, FL 33032 Helpline/Hotline: (305) 763-2459 (305) 247-1388 <a href="http://www.mujerfla.org">http://www.mujerfla.org</a>	Services include: 24-hour hotline, information and referral, crisis intervention, advocacy and accompaniment, crisis counseling, medical referrals, and case management.
<b>Survivors' Pathway (Miami)</b>	1801 Coral Way, Suite 200 Miami, Florida 33145 (786) 275-4364 <a href="http://survivorspathway.org">http://survivorspathway.org</a>	Services include: counseling and social services
<b>San Francisco Women Against Rape</b>	3543 18 <sup>th</sup> Street #7 San Francisco, CA 94110 (415) 861-2024 (415) 647-7273 (24-hour hotline) <a href="http://sfwar.org">http://sfwar.org</a>	Services include: 24-hour crisis hotline, counseling and support groups, legal advocacy, medical accompaniment and advocacy, and case management

<b>Trauma Recovery Center (San Francisco)</b>	2727 Mariposa Street, Suite 100 San Francisco, CA 94110 (415) 437-3000 <a href="http://traumarecoverycenter.org/">http://traumarecoverycenter.org/</a>	Services include: medical services for acutesexual assault and support services to survivors of interpersonal violence.
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**B. Seeking Confidential Medical Assistance**

Experiencing any form of Title IX Sexual Harassment can be difficult and overwhelming. Individuals 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 to the University and/or to law enforcement, the University strongly encourages individuals who believe they are victims of Sexual Assault, Dating Violence, Domestic Violence, or Stalking to seek medical attention as soon as possible, even if they feel no injury was sustained. Medical assistance providers can treat visible physical injuries and identify injuries that may not be visible, and, where appropriate, also address concerns regarding sexually transmitted infections and pregnancy, and provide emergency contraception (if requested). In addition, a hospital can test for the presence of alcohol or drugs (e.g., “date rape” drugs) and perform a rape evidence collection procedure (see Section II(D)(2)), which are also strongly recommended to preserve all legal remedies.

As noted above, the Medical Resources in Sections II(B) are also Confidential Resources and are not obligated to disclose reports of Title IX Sexual Harassment to the Title IX Coordinator for the University (under any circumstance) or law enforcement (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 as otherwise required by law).

**1. Medical Services Available On or Near the Evanston and Chicago Campuses**

**Northwestern University Health Service<sup>5</sup>**

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

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

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

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<sup>5</sup> All staff in University Health Services (including team athletic trainers and team physicians) and staff in the Office of Health Promotion and Wellness are considered confidential resources.

**NorthShore University Health System/ Evanston Hospital, Emergency Dept. (24 hours)**

*Evidence collection kit available at no charge; Evanston Police Victim Services advocate can be present to provide support services, if desired.*

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

**Northwestern Memorial Hospital, Emergency Department (24 hours)**

*Evidence collection kit available at no charge; Advocate from Resilience will be present to provide support services, if desired.*

Location: 251 E Huron Street, Chicago  
Phone: (312) 926-2000  
Website: <https://www.nm.org/locations/northwestern-memorial-hospital>  
(for more information)

**Amita Health St. Francis Hospital, Emergency Services (24 hours)**

*Evidence collection kit available at no charge; Evanston Police victim services advocate can be present to provide support services, if desired.*

Location: 355 Ridge Avenue, Evanston  
Phone: (847) 316-4000  
Website: <https://www.amitahealth.org/location/amita-health-saint-francis-hospital-evanston-emergency-room>

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. Medical Services Available Near the Miami, Florida Campus**

**Jackson Memorial Hospital Roxcy Bolton Rape Treatment Center (5.8 miles from campus)**

*Evidence collection kit available at no charge.*

Location: 1611 NW 12th Avenue Institute Annex 1st Floor,  
Miami  
Phone: (305) 585-7273

Website: <https://jacksonhealth.org/locations/roxcy-bolton-rape-treatment-center/>

**3. Medical Services Available Near the Washington, D.C. Campus**

**MedStar Washington Hospital Center (2.9 miles from campus)**

*Evidence collection kit available at no charge via DC Forensic Nurse Examiners.*

Location: 110 Irving Street NW, Washington, D.C.  
Phone: (202) 877-7000  
Website: <https://www.medstarwashington.org>

**4. Medical Services Available Near the San Francisco Campus**

**Zuckerberg San Francisco General Hospital (7 miles from campus)**

*Evidence collection kit available at no charge; additional/follow-up services available via their Rape Treatment Center.*

Location: 1001 Potrero Avenue, San Francisco  
Phone: (628) 206-8000  
Website: <http://zuckerbergsanfranciscogeneral.org/>

**C. Preserving Physical Evidence**

Many Title IX Sexual Harassment offenses also are crimes in the state or locality in which the incident occurred. For that reason, individuals who believe they are victims of Sexual Assault, Dating Violence, Domestic Violence, or Stalking often have legal options that they can pursue. For example, an individual 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 Assault, Dating Violence, Domestic Violence, or Stalking is reported to the police or the University, Northwestern strongly encourages individuals who have experienced such conduct to preserve evidence to the greatest extent possible, as this will best preserve 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 Title IX Sexual Harassment, 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 Assault, Dating Violence, Domestic Violence, or Stalking. It is important to keep in mind that each suggestion may not apply in every incident:

**1. General physical evidence preservation suggestions:**

- In order to best preserve their legal options in the future, individuals should consider not altering, disposing of, or destroying any physical evidence of the incident.
- If there is suspicion that a drink may have been drugged, an individual should inform a medical assistance provider and/or law enforcement as soon as possible so they can attempt to collect possible evidence (e.g., from the drink, through urine or blood sample).
- Individuals can preserve evidence of electronic communications by saving them and/or by taking screen shots of text messages, instant messages, social networking pages, or other electronic communications, and by keeping pictures, logs, or copies of documents that relate to the incident and/or perpetrator.
- Even if individuals choose not to make a complaint with the University, they may consider speaking with University Police or other law enforcement to preserve evidence. Please note that, as University employees, University Police would have to inform the Title IX Coordinator of any reports of Title IX Sexual Harassment of which they are made aware.

## **2. Physical evidence preservation suggestions specific to Sexual Assault:**

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

## **D. Educational Training, Awareness, and Prevention Programs**

The University offers a variety of training, awareness, and prevention programs to help prevent Title IX Sexual Harassment within the Northwestern community. The University strives to ensure that such programming is developed to be culturally relevant; trauma

informed; inclusive of diverse communities and identities; sustainable; responsive to community needs; informed by research or assessed for value, effectiveness, and outcome; and considerate of environmental risk and protective factors as they occur on the individual, relationship, institutional, community, and societal levels.

Additionally, the University will ensure that University officials acting under this policy, including but not limited to the Title IX Coordinator, investigators, decision makers, University provided advisors, and appeal reviewers receive training in compliance with 34 C.F.R. §106.45(b)(1)(iii), the Illinois Preventing Sexual Violence in Higher Education Act, and any other applicable state or federal law.

For information on educational training, awareness, and prevention programs offered each year, see: <https://www.northwestern.edu/sexual-misconduct/education>.

### III. Title IX Sexual Harassment Complaint Resolution Process

#### A. Introduction

The procedures below outline the process the University follows when it receives a report alleging a violation of the *Interim Policy on Title IX Sexual Harassment* committed by a member of the Northwestern community. For the purposes of this Policy, “by a member of the Northwestern community” means current students (as defined by the Student Handbook), current faculty (as defined by the Faculty Handbook), current staff members, and current third-party affiliates who have a formal (including contractual) relationship with the University.

The procedures below do not apply to reports alleging violations of this policy committed by visitors to campus or by former students, former faculty, former staff members, or former third-party affiliates. The procedures below also do not apply to Sexual Harassment that occurs outside the geographic boundaries of the United States. As indicated above, misconduct occurring outside of the jurisdiction of this policy may be addressed by other University policies, which may include but are not necessarily limited to the University’s [Policy on Institutional Equity](#).

The Office of Equity (“the Office”) is responsible for handling reports alleging violations of this policy. University groups, including student groups, and departments are expected to report to the Office of Equity any concerns of Title IX Sexual Harassment of which they become aware, and are not to take independent action to seek to resolve any such concerns or reports. All reports will be handled in a prompt, fair, and impartial manner in accordance with Title IX, the *Violence Against Women Act*, the *Illinois Preventing Sexual Violence in Higher Education Act*, and other relevant laws and regulations, applicable University policies, and this process.

The process described below is Northwestern’s internal University process to determine whether Northwestern’s policy was violated and is not a court system. As such, Northwestern’s process does not use the same rules of procedure and evidence as those used by courts or law enforcement. **A person who has experienced Title IX Sexual Harassment or any potential crime has the right to simultaneously file and pursue both a criminal complaint with law enforcement and a complaint with the University if they choose, and to be assisted by the University in notifying law**

**enforcement authorities if they choose, or to decline to notify such authorities.**  
Parties may also have options to file civil actions in court.

**B. Response to Reports**

As explained in Section I(F)(1)(a) above, upon receipt of a report, an Office of Equity staff member will contact the person who may have been impacted by the concern. The outreach from the Office of Equity staff member will generally include information about: medical and confidential counseling and support resources; options for filing a Formal Complaint and/or reporting the incident to law enforcement; how to request a protective order or no-contact directive; how to request Supportive Measures from the University with or without filing a Formal Complaint; how to preserve evidence; and where to access more information. The outreach will also include an invitation to meet with or provide additional information to an Office of Equity staff member. [Note: The Process for response to Formal Complaints is detailed below in Section F.]

The Office may, in its discretion, reopen a case in the future as appropriate and if additional information becomes available. The closure of a case at the preliminary assessment stage does not prevent the Office from making non-punitive, educational outreach to those involved.

**C. Offer of Supportive Measures**

The University will offer and make available Supportive Measures to the Complainant regardless of whether the Complainant elects to file a Formal Complaint.

In the event a Formal Complaint is filed, contemporaneously with the Respondent being notified, the Office of Equity will notify the Respondent of the availability of Supportive Measures for the Respondent. The University will offer and make available Supportive Measures to the Respondent in the same manner in which it offers and makes them available to the Complainant. The University will also offer and make available Supportive Measures to the Respondent prior to the Respondent being notified of a Formal Complaint, if the Respondent requests such measures.

The University will maintain the confidentiality of Supportive Measures provided to either a Complainant or Respondent, to the extent that maintaining such confidentiality does not impair the University's ability to provide the Supportive Measures in question.

**D. Formal Complaint**

A Complainant may file a Formal Complaint with the Office of Equity requesting that the University investigate and adjudicate a report of Title IX Sexual Harassment in accordance with the provisions of this section. At the time the Complainant submits a Formal Complaint, the Complainant must be participating in, or attempting to participate in, one or more of the University's Education Programs or Activities.

A Complainant may file a Formal Complaint with the Office of Equity in person, by regular mail, or by email using the contact information specified in Section I(F) above, or by using the Formal Complaint form available at <http://bit.ly/NUFormalTitleIXComplaint>. No person may submit a Formal Complaint on

the Complainant's behalf.

In cases where an individual reporting Title IX Sexual Harassment requests anonymity or does not wish to file a Formal Complaint, the University will attempt to honor that request but, in some cases, the Title IX Coordinator may determine that the University needs to proceed with an investigation and will thereby sign a Formal Complaint.

The Office will consider the following factors in reaching a determination on whether to have the Title IX Coordinator sign a Formal Complaint:

- The totality of the known circumstances;
- The nature and scope of the alleged conduct, including whether the reported behavior involves the use of a weapon;
- The respective ages and roles of the Complainant and Respondent;
- The risk posed to any individual or to the campus community by not proceeding, including the risk of additional violence;
- Whether there have been other reports of other prohibited conduct or other misconduct by the Respondent;
- Whether the report reveals a pattern of misconduct (e.g., via illicit use of drugs or alcohol) at a given location or by a particular group;
- The Complainant's interest in the University's not pursuing an investigation or disciplinary action and the impact of such actions on the Complainant;
- Whether the University possesses other means to obtain relevant evidence;
- Fairness considerations for both the Complainant and the Respondent;
- The University's obligation to provide a safe and non-discriminatory environment; and
- Any other available and relevant information.

Where the Title IX Coordinator signs a Formal Complaint, the Title IX Coordinator is not a Complainant or otherwise a party for purposes of the investigation and adjudication processes. In such cases, the University will not compel an individual to participate, but will proceed with the available information. In all cases where a Formal Complaint is filed, the Complainant will be treated as a party, irrespective of the party's level of participation.

#### **E. Consolidation of Formal Complaints**

The University may consolidate the investigation of Formal Complaints as to allegations of Title IX Sexual Harassment against more than one Respondent, or by more than one Complainant against one or more Respondents, or by one party against the other party, where the allegations of Title IX Sexual Harassment arise out of the same facts or circumstances. Where the investigation and adjudication process involve more than one Complainant or more than one Respondent, references in this policy to the singular "party," "Complainant," or "Respondent" include the plural, as applicable. A Formal Complaint of Title IX Retaliation may be consolidated with a Formal Complaint of Title

## IX Sexual Harassment.

Additionally, the University may consolidate the investigation of a Formal Complaint as to allegations of Title IX Sexual Harassment and allegations of conduct covered by other University policies if arising out of the same or similar circumstances, and/or the allegations are substantially related.

### F. Initial Inquiry and Dismissal Prior to Commencement of Investigation

In a case where the Complainant files a Formal Complaint, the Office of Equity will conduct an initial inquiry. An initial inquiry is an assessment by the Office of Equity as to whether the allegations, if substantiated, would rise to the level of a violation of University Policy; a determination of the specific policy implicated; and an assessment of appropriate University response.

Following an initial inquiry, possible next steps include:

- **Dismiss the Formal Complaint:** If the conduct alleged in the Formal Complaint would not constitute a violation of this policy even if proved, if it did not occur in Northwestern's Education Program or Activities, or did not occur against a person in the United States, the Office of Equity must dismiss the Formal Complaint with regard to that conduct under this policy.

Such a dismissal does not preclude action under other University policies.

In the event the Office of Equity determines the Formal Complaint must be dismissed pursuant to this Section, the Office of Equity will provide written notice of dismissal, including the reasons for the dismissal, to the parties and advise them of their right to appeal pursuant to the appeal procedures detailed below. The Office of Equity may refer the subject matter of the Formal Complaint to other University offices, as appropriate. A dismissal pursuant to this Section is presumptively a final determination for purposes of this policy, unless otherwise specified in writing by the Title IX Coordinator in the written notice of dismissal. The dismissal of a case does not prevent the office from making non-punitive, educational outreach to those involved.

- **Restorative resolution<sup>6</sup>:** In matters where a Formal Complaint has been filed and has passed initial inquiry, the parties may elect to resolve the matter through the University's Restorative Justice Program. Restorative resolution is voluntary and the University will not require parties to engage in this process. Parties interested in restorative resolution will receive a written notice disclosing: the allegations, the requirements of the restorative process including the circumstances under which it precludes the parties from resuming a Formal Complaint arising from the same allegations, and notice that at any time prior to agreeing to a resolution, any party has the right to withdraw from the informal resolution process and resume the Complaint Resolution Process with respect to the Formal Complaint. In the event a party withdraws from the restorative process, records from the restorative process will not

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<sup>6</sup> The University's Restorative Justice Program is currently in development. The restorative resolution option will become available upon the launch of the program.

be shared with those investigating the matter but may be maintained by the Restorative Justice Program. All parties will be asked to provide voluntary, written consent to the restorative process before it begins. This process will not be used to resolve allegations that an employee sexually harassed a student.

- **Open an investigation:** If the conduct alleged in the Formal Complaint passes initial inquiry or the Title IX Coordinator has signed a Formal Complaint, and the parties have not elected restorative resolution, the office will proceed with a formal investigation and hearing under these procedures.

## **G. Investigation**

The University invites parties to participate fully in all aspects of the investigation and hearing processes outlined below.

### **1. Notification**

Within seven (7) calendar days of completing an initial inquiry resulting in the opening of an investigation, the Office of Equity will provide written notice to the parties who are known that includes:

- Notice of Northwestern's complaint resolution process.
- Sufficient details of the allegations known at the time so that the parties may prepare a response before an initial interview with the investigator(s), including:
  - The identifies of the parties involved in the incident, if known;
  - The conduct alleged to constitute Title IX Sexual Harassment under this policy; and
  - The date and location of the incident(s), if known.

The notice will include statements that the Respondent is presumed not responsible for the alleged conduct; the Complainant is presumed to have brought forward the complaint in good faith; and a determination regarding responsibility is made at the conclusion of the complaint resolution process.

The written notice will inform the parties of their right to inspect and review evidence as specified in Section III(G)(5) below, and that they may have an advisor of their choice, who may be, but is not required to be, an attorney.

The written notice will inform the parties of the University's prohibitions on retaliation and knowingly making false statements or knowingly submitting false information during the complaint resolution process.

If, in the course of an investigation, the University decides to investigate additional allegations about the Complainant or Respondent that arise that were not included in the initial notice, the Office of Equity will provide notice of the additional allegations to the parties whose identities are known pursuant to the requirements above.

### **2. Dismissal of Formal Complaint During Investigation or Adjudication**

The University may dismiss a Formal Complaint or any allegations therein at any point during the investigation or hearing process if:

- The Complainant requests to withdraw the Formal Complaint or any discrete allegations therein (in which case those discrete allegations may be dismissed) by contacting the Title IX Coordinator in writing. The Title IX Coordinator or designee will determine whether to dismiss the Formal Complaint or allegations or conclude the investigation and hearing without the Complainant's continued participation.
- The Respondent is no longer enrolled or employed by the University, as the case may be; or
- Specific circumstances prevent the University from gathering evidence sufficient to reach a determination as to the Formal Complaint, or any discrete allegations therein (in which case those discrete allegations may be dismissed).

In the event the Title IX Coordinator determines that a Formal Complaint should be dismissed pursuant to this Section, the Title IX Coordinator will provide written notice of dismissal, including the reasons for the dismissal, to the parties and advise them of their right to appeal as specified in Section III(I). The Title IX Coordinator may refer the subject matter of the Formal Complaint to other University offices, as appropriate. A dismissal pursuant to this Section is presumptively a final determination as it pertains to this policy, unless otherwise specified in writing by the Title IX Coordinator in the written notice of dismissal.

### **3. Investigation Process**

The Office of Equity investigates Formal Complaints. Depending upon the circumstances, the Office of Equity may assign one or more investigators from the Office of Equity. In some cases, an investigator from another University office may conduct the investigation under the direction of the Office of Equity, or an outside investigator may be retained. All investigators are trained on Title IX and the University's policies and procedures. Depending on the circumstances and in its discretion, the University may consolidate or sever for investigation and/or resolution allegations involving this and other University policies involving the same Respondent and/or Complainant. Any alleged violations of this policy will be investigated and resolved pursuant to the process articulated by this policy.

During the investigation, the investigator(s) will identify, elicit, and gather evidence related to the alleged misconduct, including inculpatory and exculpatory evidence. The burden of gathering evidence sufficient to reach a determination in the adjudication of whether or not a policy determination has occurred lies with the University and not with the parties. However, it is important for all individuals involved in an investigation to identify relevant evidence it would like the University to consider.

During the investigation, the Complainant will have the opportunity to describe their allegations and present supporting evidence to the investigator(s). The Respondent will have the opportunity to hear the allegations, respond to them,

and present supporting evidence to the investigator(s).

Investigation meetings are not audio or video recorded by the University, and may not be recorded by any participant. Parties and witnesses may take notes during investigation meetings. The Complainant and the Respondent will have an equal opportunity to present names of potential witnesses and to propose questions the investigator(s) might ask the other party or witnesses.

Complainants and Respondents may identify potential factual and/or expert witnesses but may not present character witnesses. The investigator(s) will take the witness lists provided by the Complainant and Respondent into consideration when identifying the witnesses they will interview and what questions they might ask each witness, but these decisions are solely within the investigator's discretion. The investigator(s) retains discretion to limit the number of witness interviews the investigator(s) conducts if the investigator(s) finds that testimony would be unreasonably cumulative, if the witnesses are offered solely as character references and do not have information relevant to the allegations at issue, or if the witnesses are offered to render testimony that is categorically inadmissible, such as testimony concerning sexual history of the Complainant. The investigator(s) may also choose to interview other witnesses not identified by the parties. The investigator(s) will not restrict the ability of the parties to gather and present relevant evidence on their own.

Generally, the investigator(s) will meet with each party and each witness separately and may hold multiple meetings with a party to obtain all necessary information. The parties may submit additional materials or information to the investigator(s) at any time before the conclusion of the investigation. In all cases, both the Complainant and Respondent will have equal opportunities to share information and have their information considered. The Complainant, Respondent, and witnesses should be advised that for their statements to be considered, they must participate in the live-hearing.

Information about treatment records and other privileged information appears in Section III(K) below.

Parties and witnesses whose participation is invited or expected at any interview or other meeting as part of the investigation will receive written notice of the date, time, location, participants, and purpose of all such investigative interviews or other meetings, with sufficient time for the party to prepare to participate.

#### **4. Investigation Timeline**

Though the University strives to resolve all cases in a prompt and timely manner, the timeline and length of each investigation may vary based on the totality of the circumstances of the case, including breaks in the academic calendar, availability of the parties and witnesses (including due to a leave of absence), the scope of the investigation, the need for supportive measures, and unforeseen or exigent circumstances.

Although the length of each investigation will vary, the University strives to complete the investigation portion of the resolution process within ninety (90) calendar days of sending the written notice of Formal Complaint. The timeline for

the hearing portion of the resolution process is explained below.

The parties will be periodically updated on the status of the investigation. In cases where there is a simultaneous law enforcement investigation, the University may need to temporarily delay its investigation while law enforcement gathers evidence. However, the University investigation will generally proceed with its investigation and resolution of a Formal Complaint during any law enforcement investigation.

**5. Opportunity to Inspect and Review Evidence**

At the conclusion of the evidence-gathering phase of the investigation but prior to the completion of the investigation report, the investigator(s) will provide both parties an equal opportunity to inspect and review any evidence obtained as part of the investigation that is directly related to the allegations raised in the Formal Complaint. This includes evidence upon which Northwestern may choose not to rely in reaching a determination regarding responsibility and inculpatory or exculpatory evidence, whether obtained from a party or other source. The investigator(s) will send this evidence, in either electronic or hard copy form, to each party and each party's advisor, if any. The parties may each submit to the investigator(s) a written response including comments, feedback, or any other information they deem relevant, comprising up to twenty (20) pages, within ten (10) calendar days after the evidence is made available for their review. The Title IX Coordinator or designee may, in their discretion, waive or extend the page or time limit for the written response. The investigator(s) will consider the written responses prior to completing the investigation report.

The parties and their advisors are permitted to review the evidence solely for the purposes of this grievance process and may not photograph or disseminate the evidence.

**6. Investigative Report**

After the period for the parties to provide any written response to the evidence has expired, the investigator(s) will create a written investigative report that fairly summarizes the relevant evidence collected (both inculpatory and exculpatory). The Office of Equity will provide a copy of the investigative report to each party and each party's advisor, if any, in either electronic or hard copy form.

**H. Hearings**

**1. Purpose**

The purpose of the hearing is for the University's decision maker to resolve any outstanding issues of contested facts, assess the credibility of parties and witnesses, and using a preponderance of the evidence standard, determine whether it is more likely than not that a policy violation or violations occurred.

**2. Appointment of Decision Maker**

Upon completion of the investigation, the Title IX Coordinator will promptly appoint a trained decision maker, who cannot be the same person as the Title IX

Coordinator or investigators, who will oversee the hearing process and render a determination of responsibility for the allegations in the Formal Complaint, at the conclusion of the hearing process. The Title IX Coordinator will see that the decision maker is provided a copy of the investigative report and a copy of all evidence transmitted to the parties by the investigator(s).

### **3. Hearing Notice and Response to the Investigation Report**

After the decision maker is appointed by the Title IX Coordinator, the Office of Equity will promptly transmit written notice to the parties notifying the parties of the decision maker's appointment; setting a deadline for the parties to submit any written response to the investigation report; setting a date for the pre-hearing conference; setting a date and time for the hearing; and providing a copy of the University's Hearing Procedures. Neither the pre-hearing conference, nor the hearing itself, may be held any earlier than ten (10) calendar days from the date of transmittal of the written notice specified in this Section.

A party's written response to the investigative report must include:

- To the extent the party disagrees with the investigative report, any argument or commentary regarding such disagreement;
- Any argument that evidence should be categorically excluded from consideration at the hearing based on privilege, relevancy, the prohibition on the use of sexual history specified in Section III(L), or for any other reason;
- A list of any witnesses that the party contends should be requested to attend the hearing pursuant to an attendance notice issued by the decision maker;
- A list of any witnesses that the party intends to bring to the hearing without an attendance notice issued by the decision maker;
- Any objection that the party has to the University's Hearing Procedures;
- Any request that the parties be separated physically during the pre-hearing conference and/or hearing;
- Any other accommodations that the party seeks with respect to the pre-hearing conference and/or hearing;
- The name and contact information of the advisor who will accompany the party at the pre-hearing conference and hearing;
- If the party does not have an advisor who will accompany the party at the hearing, a request that the University provide an advisor for purposes of conducting questioning as specified in Section III(J).

A party's written response to the investigation report may also include:

- Argument regarding whether any of the allegations in the Formal Complaint are supported by a preponderance of the evidence; and
- Argument regarding whether any of the allegations in the Formal

Complaint constitute Title IX Sexual Harassment.

**4. Pre-Hearing Conference**

Prior to the hearing, the decision maker will conduct a pre-hearing conference with the parties and their advisors. The pre-hearing conference will be conducted live, with simultaneous and contemporaneous participation by the parties and their advisors. However, upon request of either party, the parties will be separated into different rooms with technology enabling the parties to participate simultaneously and contemporaneously by video and audio.

In the decision maker's discretion, the pre-hearing conference may be conducted virtually, by use of video and audio technology, where all participants participate simultaneously and contemporaneously by use of such technology.

During the pre-hearing conference, the decision maker will discuss the hearing procedures with the parties; address matters raised in the parties' written responses to the investigation report, as the decision maker deems appropriate; discuss whether any stipulations may be made to expedite the hearing; discuss the witnesses the parties have requested be served with notices of attendance and/or witnesses the parties plan to bring to the hearing without a notice of attendance; and resolve any other matters that the decision maker determines, in the decision maker's discretion, should be resolved before the hearing.

**5. Issuance of Notices of Attendance**

After the pre-hearing conference, the decision maker or the Office of Equity will transmit notices of attendance to any University employee or student whose attendance is requested at the hearing as a witness, at least ten (10) calendar days prior to the hearing. The notice will advise the subject of the specified date and time of the hearing and advise the subject to contact the decision maker immediately if there is a material and unavoidable conflict.

The subject of an attendance notice should notify any manager, faculty member, coach, or other supervisor, as necessary, if attendance at the hearing will conflict with job duties, classes, or other obligations. All such managers, faculty members, coaches, and other supervisors are required to excuse the subject of the obligation, or provide some other accommodation, so that the subject may attend the hearing as specified in the notice.

The University will not issue a notice of attendance to any witness who is not an employee or a student.

**6. Participation**

Parties and witnesses will be asked to attend the hearing where they may be questioned by the decision maker and cross-examined by a party's advisor. In the event that a party or witness does not appear at or answer questions at the hearing, the decision maker will rely on relevant evidence available through the investigation and hearing in making the ultimate determination of responsibility. The decision maker may not draw any inference solely from a party's or witness's absence from the hearing or refusal to submit to cross-examination or

answer other questions.

## 7. **Format**

The decision maker will facilitate the hearing process. The hearing will be conducted live, with simultaneous and contemporaneous participation by the parties and their advisors. At Northwestern's discretion, the live hearing may be conducted in-person, with the decision maker, the parties, the advisors, witnesses, and other necessary University personnel together in the same physical location, or any or all parties, witnesses, and other participants may appear at the hearing virtually, with technology enabling them to participate simultaneously and contemporaneously.

At the request of either party, the live hearing will occur with the parties located in separate rooms with technology enabling the decision maker and parties to simultaneously see and hear the party or the witness answering questions. The parties will not be compelled to be present or testify in the same physical location as the other party.

An audio or audiovisual recording or transcript will be made of the live hearing, and the recording or transcript will be made available to the parties for inspection and review upon request.

The hearing will proceed as follows:

- The decision maker will begin by asking questions of each witness.
- After the decision maker's questioning of a witness, the advisors may then cross-examine the witness, asking all relevant questions and follow-up questions, including those challenging credibility. The advisors will have the opportunity to conduct this questioning directly, orally, and in real time.
- The decision maker will then ask questions of the Complainant.
- The Respondent's advisor may then cross-examine the Complainant, asking all relevant questions and follow-up questions, including those challenging credibility.
- The decision maker will then question the Respondent.
- The Complainant's advisor may then cross-examine the Respondent, asking all relevant questions and follow-up questions, including those challenging credibility.
- At their discretion, the decision maker may ask additional follow up questions of each party after cross examination concludes.

If a party does not have an advisor present at the hearing, the University will provide an advisor of the University's choice to ask questions prepared by the party on the party's behalf. The parties will not be permitted to question the other party directly.

Except as otherwise permitted by the decision maker, the hearing will be closed

to all persons except the parties, their advisors, the investigator(s), the decision maker, the Title IX Coordinator or designee, and other necessary University personnel. With the exception of the investigator(s) and the parties, witnesses will only be present during their testimony.

During the hearing, the parties and their advisors will have access to the investigation report and evidence that was transmitted to them pursuant to Section III(G)(5) and III(G)(6).

While a party has the right to attend and participate in the hearing with an advisor, a party and/or advisor who materially and repeatedly violates the rules of the hearing in such a way as to be materially disruptive, may be barred from further participation and/or have their participation limited, as the case may be, in the discretion of the decision maker.

Subject to the minimum requirements specified in this Section, the decision maker will have sole discretion to determine the manner and particulars of any given hearing, including with respect to the length of the hearing, the order of the hearing, and questions of admissibility.

The hearing is not a formal judicial proceeding and strict rules of evidence do not apply. The decision maker will have discretion to modify the Hearing Procedures, when good cause exists to do so, and provided the minimal requirements specified in this Section are met.

#### **8. Relevancy of Questions**

Only relevant cross-examination and other questions may be asked of a party or witness. The decision maker will determine the relevancy of all questions asked during the hearing. Before a Complainant, Respondent, or witness answers a cross-examination or other question, the decision maker must first determine whether the question is relevant and explain any decision to exclude a question as not relevant. Parties and advisors may not challenge these determinations during the hearing. The decision maker must permit each party's advisor to ask the other party and any witnesses all relevant questions and follow-up questions, including those challenging credibility. Questions that are duplicative or repetitive of those already asked may be deemed not relevant and thus excluded.

#### **9. Deliberation and Determination Regarding Responsibility**

After the hearing is complete, the decision maker will objectively evaluate all relevant evidence collected during the investigation, including both inculpatory and exculpatory evidence, together with testimony and non-testimony evidence received at the hearing, and ensure that any credibility determinations made are not based on a person's status as a Complainant, Respondent, or witness. The decision maker will take care to exclude from consideration any evidence that was ruled inadmissible at the pre-hearing conference, during the hearing, or by operation of Sections III(K) or III(L). The decision maker will resolve disputed facts using a preponderance of the evidence (i.e., "more likely than not") standard and reach a determination regarding whether the facts that are supported by a preponderance of the evidence constitute one or more violations of the policy

as alleged in the Formal Complaint.

#### **10. Sanctions and Remedies**

In the event the decision maker determines that the Respondent is responsible for violating this policy, the decision maker will, prior to issuing a written decision, consult with the appropriate University personnel with disciplinary authority over the Respondent and such personnel will determine any sanctions to be imposed:

- For student Respondents, in the event a policy violation is found, the decision maker will consult with a UHAS Sanctioning Panel comprised of three faculty or staff members.
- For staff Respondents, in the event a policy violation is found, the decision maker will consult the HR Business Partner and the Respondent's manager or unit leader.
- For faculty Respondents, in the event a policy violation is found, the decision maker will consult with a faculty sanctioning panel.

The decision maker will also, prior to issuing a written decision, consult with the Title IX Coordinator who will determine whether and to what extent ongoing Supportive Measures or other remedies will be provided to the Complainant. All consultation should occur within seven (7) calendar days of the hearing.

#### **11. Written Decision**

After reaching a determination and consulting with the appropriate University personnel and Title IX Coordinator, the decision maker will issue a written determination regarding responsibility applying the preponderance of the evidence standard within seven (7) calendar days of a decision. The written determination will be provided to the parties simultaneously and will include:

- Identification of the allegations potentially constituting Title IX Sexual Harassment and, if applicable, other University policy violations;
- A description of the procedural steps taken from the receipt of the Formal Complaint through the determination, including any notifications to the parties, interviews with parties and witnesses, site visits, methods used to gather other evidence, and hearings held;
- Findings of fact supporting the determination;
- Conclusions regarding the application of Northwestern's policy to the facts;
- A statement of, and rationale for, the result as to each allegation, including a determination regarding responsibility for each separate potential incident;
- Any disciplinary sanctions imposed on the Respondent;
- Whether remedies designed to restore or preserve equal access to the recipient's Education Program or Activity will be provided to the Complainant; and
- The procedures and permissible bases for the Complainant and Respondent to

appeal.

The determination regarding responsibility becomes final either on the date that the appeal reviewer provides the parties with the written determination of the result of the appeal, if an appeal is filed, or if an appeal is not filed, the date on which an appeal would no longer be considered timely.

The Title IX Coordinator is responsible for effective implementation of any remedies.

## **I. Appeals**

Either party may appeal the dismissal of a Formal Complaint or any allegations therein or the determination regarding responsibility. The only bases for appeal are as follows:

- Procedural irregularity that affected the outcome of the matter;
- New evidence that was not reasonably available at the time the determination regarding responsibility or dismissal was made, that could affect the outcome of the matter;
- The Title IX Coordinator, investigator(s), or decision-maker(s) had a conflict of interest or bias for or against Complainants or Respondents generally or the individual Complainant or Respondent that affected the outcome of the matter; or
- The sanction is disproportionate with the violation.

A party must file an appeal within ten (10) calendar days of the date the dismissal or hearing determination is issued. The appeal must be submitted in writing to the appropriate appeal reviewer identified below.

The appeal is not a rehearing of the case; it is a written statement specifically stating the grounds for the appeal and any supporting information. If either party submits an appeal, the other party will be notified in writing that the appeal has been filed, provided with a copy of the appeal, and given ten (10) calendar days to submit a written response. A written response is limited to fifteen (15) pages. The relevant appeal reviewer may, in their discretion, adjust the time limit for the appeal and/or response.

In the event sanctions were imposed, the sanctions will be stayed pending resolution of an appeal.

Appeals will be handled by the following reviewers, who may delegate the review of an appeal to a designee and will delegate review in any case in which they cannot serve as an impartial reviewer.

**An appeal of a finding in a complaint against a student should be addressed to:**

*Associate Dean/Director of Community Standards*  
*Scott Hall*  
*601 University Place*  
*Evanston, IL 60208*  
[lucas.christain@northwestern.edu](mailto:lucas.christain@northwestern.edu)

**An appeal of a finding in a complaint against a faculty member should be addressed to:**

*Associate Provost for Faculty  
Rebecca Crown Center  
633 Clark Street  
Evanston, IL 60208  
(847) 491-8543  
[assoc-prov-faculty@northwestern.edu](mailto:assoc-prov-faculty@northwestern.edu)*

**An appeal of a complaint against a staff member<sup>7</sup> or third-party affiliate should be addressed to:**

*Vice President for Human Resources  
720 University Place  
Evanston, IL 60208  
(847) 491-7505  
[lorraine.goffe@northwestern.edu](mailto:lorraine.goffe@northwestern.edu)*

The appeal is solely conducted via written statements. Neither the Respondent nor the Complainant will be allowed to request an in-person meeting with the appeal reviewer. In an extraordinary circumstance, the appeal reviewer may request an in-person meeting with the Complainant and Respondent. Should the appeal reviewer request a meeting with one party, a meeting will also be requested with the other party.

In the event the appeal includes the appeal of a sanction, the appeal reviewer will, prior to issuing a written decision, consult with the appropriate University personnel with disciplinary authority over the Respondent and such officials will evaluate any sanctions to be imposed:

- For student Respondents, in the event of an appeal of a sanction, the appeal reviewer will consult with a UHAS Appeals Panel comprised of three faculty or staff members.
- For staff Respondents, in the event of an appeal of a sanction, the appeal reviewer will consult with the HR Business Partner and the Respondent's manager or unit leader.
- For faculty Respondents, in the event of an appeal of a sanction, the appeal reviewer will consult with the Executive Committee of the Faculty Appeals Panel who will review the basis of the appeal. The Executive Committee may review all documentation from the investigation and sanctioning process and any appeal statements received from the parties, and it may pose questions of the Office of Equity and the Sanctioning Panel if needed. The Committee may, at its discretion, call individual meetings with the faculty member and complainant or any other individual with firsthand information. The Executive Committee will make their recommendation to the Provost as to whether one or more of the grounds of the appeal has been met. The Provost will then make a decision whether to uphold the Sanctioning Panel's decision and what sanctions to impose. The Provost's decision is final.

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<sup>7</sup> The Staff Handbook provides an additional process for staff members appealing a sanction of termination.

The written decision on an appeal will be issued simultaneously to the parties as expeditiously as possible, usually within seven (7) calendar days of making a decision, though this may vary based on the scope of the appeal or unforeseen circumstances. The reviewer may review the full case, beyond the aspects of the case outlined in the request for appeal. If the reviewer does not find that any of the three grounds for appeal are present in the case, the outcome will be upheld. If the reviewer finds that any of the grounds for appeal are present in the case, they may amend the outcome, may issue a new outcome, or may refer the matter back to the decision maker for further consideration. No further review beyond the appeal is permitted.

**J. Advisor of Choice**

From the point a Formal Complaint is made, and until an investigation, adjudication, and appeal are complete, the Complainant and Respondent will have the right to be accompanied by an advisor of their choice to all meetings, interviews, and hearings that are part of the investigation, adjudication, and appeal process. The advisor may be, but is not required to be, an attorney.

Except for the questioning of witnesses during the hearing specified in Section III(H)(7), the advisor will play a passive role and is not permitted to communicate on behalf of a party, insist that communication flow through the advisor, or communicate with the University about the matter. In the event a party's advisor of choice engages in material violation of the parameters specified in this Section, the University may preclude the advisor from further participation, in which case the party may select a new advisor of their choice.

While a party has the right to attend and participate in the hearing with an advisor, an advisor who materially and repeatedly violates the rules of the hearing in such a way as to be materially disruptive, may be barred from further participation and/or have their participation limited, as the case may be, in the discretion of the decision maker.

In the event a party is not able to secure an advisor to attend the live hearing specified in Section III(H), the University will provide the party an advisor, without fee or charge, who will conduct questioning on behalf of the party at the hearing. The University will have sole discretion to select the advisor it provides. The advisor the University provides may be, but is not required to be, an attorney.

The University is not required to provide a party with an advisor in any circumstance except where the party does not have an advisor present at the hearing specified in Section III(H) and requests that the University provide an advisor.

**K. Treatment Records and Other Privileged Information**

During the investigation and adjudication processes, the investigator(s) and adjudicator, as the case may be, are not permitted to access, consider, disclose, permit questioning concerning, or otherwise use:

- A party's records that are made or maintained by a physician, psychiatrist, psychologist, or other recognized professional or paraprofessional acting in the professional or paraprofessional's capacity, or assisting in that capacity, and which

are made and maintained in connection with the provision of treatment to the party; or

- Information or records protected from disclosure by any other legally-recognized privilege, such as the attorney-client privilege;

unless the University has obtained the party's voluntary, written consent to do so for the purposes of the investigation and adjudication process.

Notwithstanding the foregoing, the investigator(s) and/or adjudicator, as the case may be, may consider any such records or information otherwise covered by this Section if the party holding the privilege affirmatively discloses the records or information to support their allegation or defense, as the case may be.

#### **L. Sexual History**

During the investigation and adjudication processes, questioning regarding a Complainant's sexual predisposition or prior sexual behavior are not relevant, unless such questions and evidence about the Complainant's prior sexual behavior are offered to prove that someone other than the Respondent committed the conduct alleged, or if the questions and evidence concern specific incidents of the Complainant's prior sexual behavior with respect to the Respondent and are offered to prove consent.

Notwithstanding the foregoing, a Complainant who affirmatively uses information otherwise considered irrelevant by this Section for the purpose of supporting the Complainant's allegations, may be deemed to have waived the protections of this Section.

#### **M. Neutrality**

From the time a report or Formal Complaint is made, a Respondent is presumed not responsible for the alleged misconduct until a determination regarding responsibility is made final; the Complainant is presumed to have brought forward the complaint in good faith, and a conclusion will not be made until the resolution process concludes.

#### **N. Bad Faith Complaints and False Information**

It is a violation of this policy for any person to submit a report or Formal Complaint that the person knows, at the time the report or Formal Complaint is submitted, to be false. It is also a violation of this policy for any person to knowingly make a materially false statement during the course of an investigation, adjudication, or appeal under this policy. Violations of this Section are not subject to the investigation and adjudication processes in this policy; instead, they will be addressed under the appropriate University policies.

#### **O. Deadlines, Notices, and Method of Transmittal**

All deadlines and other time periods specified in this policy are subject to modification by the University where, in the University's sole discretion, good cause exists. Good cause may include, but is not limited to, the unavailability of parties or witnesses; the complexities of a given case; extended holidays or closures; sickness of the investigator(s), adjudicator, or the parties; unforeseen weather events; and the like.

Any party who wishes to seek an extension of any deadline or other time period may do so by filing a request with the investigator(s), decision maker, administrative officer,

appeal reviewer, or Title IX Coordinator, as the case may be, depending on the phase of the process. Such request must state the extension sought and explain what good cause exists for the requested extension. The University officer resolving the request for extension may, but is not required to, give the other party an opportunity to object. Whether to grant such a requested extension will be in the sole discretion of the University.

The parties will be provided written notice of the modification of any deadline or time period specified in this policy, along with the reasons for the modification.

Unless otherwise specified in this policy, the default method of transmission for all notices, reports, responses, and other forms of communication specified in this policy will be email using University email addresses.

A party is deemed to have received notice upon transmittal of an email to their University email address. In the event notice is provided by mail, a party will be deemed to have received notice three (3) calendar days after the notice in question is postmarked.

Any notice inviting or requiring a party or witness to attend a meeting, interview, or hearing will be provided with sufficient time for the party to prepare for the meeting, interview, or hearing as the case may be, and will include relevant details such as the date, time, location, purpose, and participants.

Unless a specific number of days is specified elsewhere in this policy, the sufficient time to be provided will be determined in the sole discretion of the University, considering all the facts and circumstances, including, but not limited to, the nature of the meeting, interview, or hearing; the nature and complexity of the allegations at issue; the schedules of relevant University officials; approaching holidays or closures; and the number and length of extensions already granted.

#### **P. Privacy and Sharing of Information**

The University considers reports and investigations to be private matters for the parties involved. All participants in an investigation will be informed that privacy 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. Witnesses and advisors will be asked to keep any information learned in an investigation meeting confidential, to the extent consistent with applicable law. While the University will maintain confidentiality specified in this Section, the University will not limit the ability of the parties to discuss the allegations at issue in a particular case. Parties are advised, however, that the manner in which they communicate about, or discuss a particular case, may constitute Title IX Sexual Harassment or Retaliation in certain circumstances and be subject to discipline pursuant to the processes specified in this policy.

The University will keep confidential the identity of any individual who has made a report or Formal Complaint of Title IX Sexual Harassment or Retaliation including any Complainant, the identity of any individual who has been reported to be a perpetrator of Title IX Sexual Harassment or Retaliation including any Respondent, and the identity of any witness, to the extent possible. The University will also maintain the confidentiality

of its various records generated in response to reports and Formal Complaints, including, but not limited to, information concerning Supportive Measures, notices, investigation materials, adjudication records, and appeal records, to the extent possible. Notwithstanding the foregoing, the University may reveal the identity of any person or the contents of any record if permitted by FERPA, if necessary to carry out the University's obligations under Title IX and its implementing regulations including providing Supportive Measures, conducting any investigation, adjudication, or appeal under this policy or any subsequent judicial proceeding, or as otherwise required by law. Further, notwithstanding the University's general obligation to maintain confidentiality as specified herein, the parties to a report or Formal Complaint will be given access to investigation and adjudication materials in the circumstances specified in this policy.

Note that certain types of Title IX Sexual Harassment are considered crimes for which the University must disclose crime statistics in its Annual Security Report that is provided to the campus community and available to the public. These disclosures will be made without including personally identifying information.

**Q. Conflicts of Interest, Bias, and Procedural Complaints**

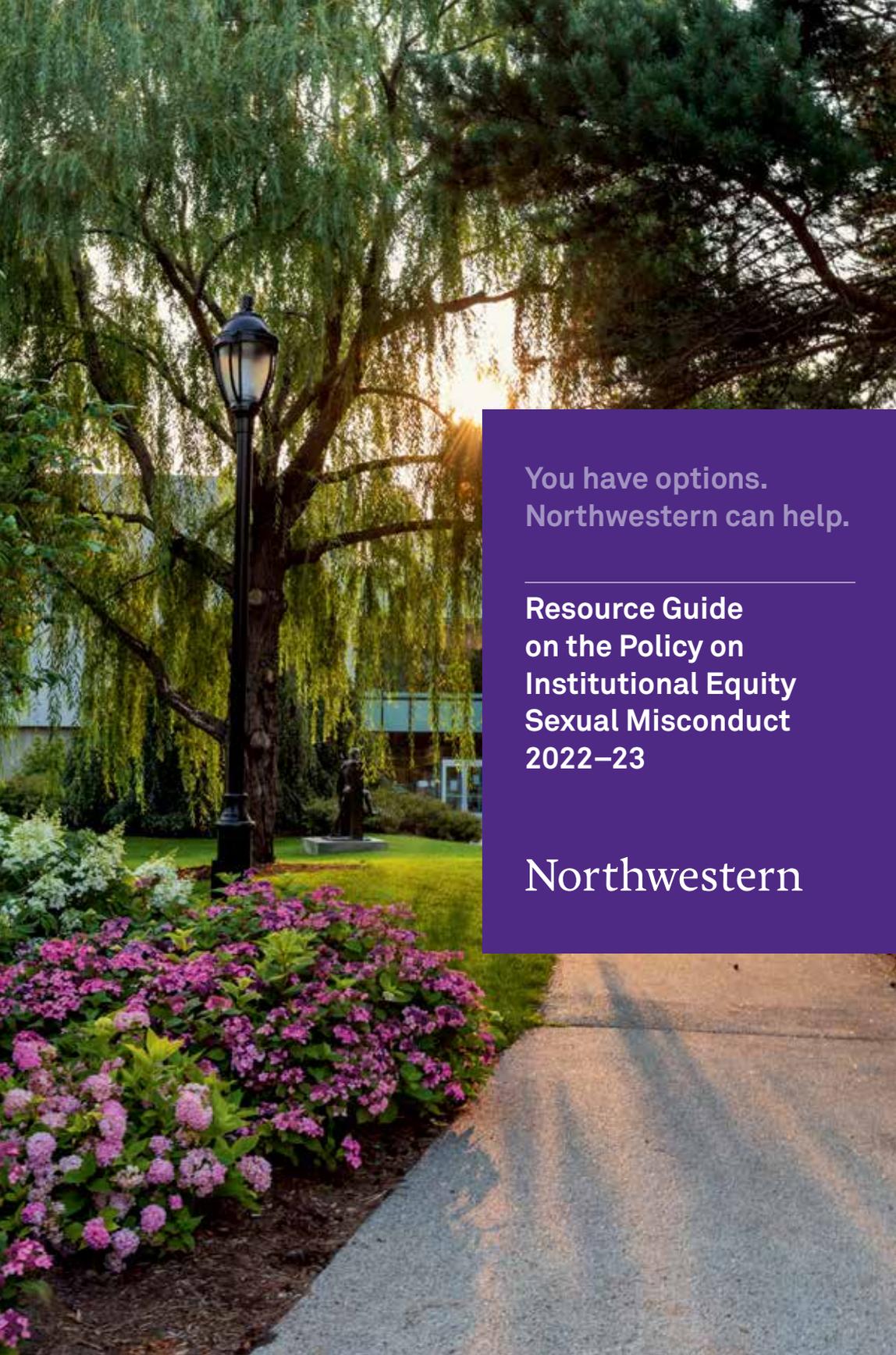
Neither the Title IX Coordinator nor any investigator, decision maker, or appeal reviewer will make findings or determinations in a case in which they have a material conflict of interest or material bias. Any party who believes one or more of these University officials has a potential material conflict of interest or material bias must raise the concern to the Title IX Coordinator within two (2) calendar days of discovering the perceived conflict so that the University may evaluate the concern and find a substitute, if appropriate. The parties will be notified of the identities of the decision maker and appeal reviewer for their proceeding before those individual(s) initiate contact with either party. The Title IX Coordinator or designee will determine whether a conflict of interest exists. The failure of a party to timely raise a concern of a conflict of interest or bias may result in a waiver of the issue for purposes of any appeal specified in Section III(I) or otherwise.

**R. Standard of Evidence**

The University uses the preponderance of the evidence standard. This means that the hearing process determines whether it is more likely than not that a violation of the policy occurred.

Attachment C:

Northwestern's Resource Guides



**You have options.  
Northwestern can help.**

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**Resource Guide  
on the Policy on  
Institutional Equity  
Sexual Misconduct  
2022–23**

**Northwestern**

# Contents

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- 1** Definitions
- 2** Options
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- 10** Help Someone Else
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Northwestern University does not discriminate or permit discrimination by any member of its community against any individual 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 services or in the educational programs or activities it operates. Harassment, whether verbal, physical, or visual, that is based on any of these characteristics is a form of discrimination. Further prohibited by law is discrimination against any employee and/or job applicant who chooses to inquire about, discuss, or disclose their own compensation or the compensation of another employee or applicant.

Northwestern University complies with federal and state laws that prohibit discrimination based on the protected categories listed above, including Title IX of the Education Amendments of 1972. Title IX requires educational institutions, such as Northwestern, to prohibit discrimination based on sex (including sexual harassment) in the University's educational programs and activities, including in matters of employment and admissions. In addition, Northwestern provides reasonable accommodations to qualified applicants, students, and employees with disabilities and to individuals who are pregnant.

Any alleged violations of this policy or questions with respect to nondiscrimination or reasonable accommodations should be directed to Northwestern's Office of Equity, 1800 Sherman Avenue, Suite 4-500, Evanston, Illinois 60208, 847-467-6165, [equity@northwestern.edu](mailto:equity@northwestern.edu).

Questions specific to sex discrimination (including sexual misconduct and sexual harassment) should be directed to Northwestern's Title IX Coordinator in the Office of Equity, 1800 Sherman Avenue, Suite 4-500, Evanston, Illinois 60208, 847-467-6165, [TitleIXCoordinator@northwestern.edu](mailto:TitleIXCoordinator@northwestern.edu).

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](http://www2.ed.gov/about/offices/list/ocr/complaintintro.html) or calling 800-421-3481. Inquiries about the application of Title IX to Northwestern may be referred to Northwestern's Title IX Coordinator, the United States Department of Education's Assistant Secretary for Civil Rights, or both.

**Northwestern University is committed to fostering an environment in which all members of our campus community are free from sexual misconduct of any form.**

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### Policy on Institutional Equity sexual misconduct may include

**Sexual assault:** sexual penetration without consent, sexual contact without consent, statutory rape, or incest

**Sexual exploitation:** taking sexual advantage of another person or violating the sexual privacy of another without consent (e.g., voyeurism, indecent exposure, recording intimate activity)

**Sexual harassment:** unwelcome conduct of a sexual nature that creates a hostile environment or is a condition of employment, academic standing, or participation in a University program or activity

**Dating/domestic violence:** any violence between two people who are or have been in a romantic or intimate relationship

**Stalking:** knowingly engaging in a course of conduct directed at a specific person that one knows or should know would cause a reasonable person to fear for their safety or suffer emotional distress (e.g., threats, following, monitoring, communication)

The full definitions of these terms can be found in the Policy on Institutional Equity.

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### Consent

Consent is present when clearly understandable words or actions manifest a **knowing, active, voluntary, and present and ongoing** agreement to engage in a specific sexual or intimate contact.

Consent is not present when an individual does not have the capacity to give consent due to age, alcohol, drugs, sleep, or other physical condition or disability.

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### Title IX

Title IX is a federal civil rights law that prohibits discrimination on the basis of sex in federally funded educational programs and activities. Pursuant to the US Department of Education's 2020 regulations implementing Title IX, the University has adopted an Interim Policy on Title IX Sexual Harassment. Specific conduct covered by the Title IX regulations on sexual harassment is addressed through the policy. A resource guide explaining that process is available on our website.

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## If you believe that you have experienced sexual misconduct, you have options.

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### Your options

- Speak with a confidential resource about your options, on or off campus. See page 11 for a list of Northwestern confidential resources.
  - Seek medical attention to treat any injuries, test for sexually transmitted infections, obtain emergency contraception (if needed), and/or perform a rape evidence collection procedure. A medical forensic exam can be performed up to seven days after an incident but is most effective if performed sooner. See page 13 for contact information.
  - Contact the police to file a report. See page 13 for contact information.
  - Contact the Office of Equity to report the incident to Northwestern, request any supportive measures, and explore resolution options (investigation, educational response, or restorative resolution). See page 12 for contact information.
  - Preserve any physical evidence you have in case you decide to report the incident at a later date.
- 

### Preserving evidence

Northwestern encourages individuals who have experienced sexual misconduct to preserve evidence to the greatest extent possible as this will preserve more options for them in the future. Some suggestions include the following:

- Preserve evidence of electronic communications, such as text messages, pictures, and/or social media posts, by saving them and/or taking screenshots.
- If there is suspicion that a drink may have been drugged, inform a medical assistance provider and/or police as soon as possible so they can collect evidence (e.g., from the drink, through urine or blood sample).
- Because evidence that may be located on the body can dissipate quickly, consider going to a hospital or medical facility immediately to seek a medical exam. If possible, do not shower, brush teeth, use the bathroom, or eat before going to the hospital or seeking medical attention. Do not wash clothes or bedding.

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## Northwestern can help you

- Connect with on-campus and off-campus resources—including medical, counseling, immigration, student financial aid, and legal resources.
- File a police report or a complaint with the University or both.
- Request measures such as no-contact directives from the University, protective orders from a court, or housing, academic, working, or transportation accommodations.

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## Supportive measures

Supportive measures are individualized services offered to parties involved in incidents of sexual misconduct. Supportive measures may include

- academic assistance
- housing or workspace relocation
- dining arrangements
- time off from class or work
- student financial aid arrangements
- transportation arrangements
- no-contact directives
- safety planning

Contact the Office of Equity to request supportive measures (see page 12). Such measures will be kept confidential to the extent possible.

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## For community members abroad

Northwestern can work with you to help create a safe environment and prioritize healing. Students, faculty, and staff participating in University-sponsored international activities who experience sexual misconduct abroad can receive information about support and services from Director of Global Safety and Security Julie Friend (see page 12). For additional information, see [northwestern.edu/global-safety-security/emergencies-abroad/sexual-misconduct](https://northwestern.edu/global-safety-security/emergencies-abroad/sexual-misconduct).

Referrals for medical care may be obtained through Northwestern's international medical assistance provider, GeoBlue (610-254-8771); at the nearest United States embassy or consulate ([usembassy.gov](https://usembassy.gov)); or by calling American Citizens Services (202-501-4444).

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## About reporting

You may choose whether to report sexual misconduct to Northwestern, law enforcement, both, or neither.

University sexual misconduct investigations can occur at the same time as police investigations.

Northwestern can help you file a police report.

Reporting to police does not obligate you to testify in court.

To encourage reporting, an individual who makes a good-faith report of sexual misconduct that was directed at them or another person will **not** be subject to disciplinary action by the University for a conduct or policy violation that is related to and revealed in the sexual misconduct report or investigation, unless the University determines that the violation was serious and/or placed the health or safety of others at risk.

There is no time limit for reporting an incident. Reports should be made as soon as possible, as the passing of time makes a review of the evidence more difficult and the memories of involved parties may become less reliable.

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## Reporting options

You may report an incident to Northwestern and request supportive measures and/or a University investigation by contacting the Office of Equity. See page 12 for contact information.

You may also report sexual misconduct electronically:

### **Sexual Misconduct Reporting Form**

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

You may also file an anonymous report:

### **EthicsPoint**

866-294-3545

[northwestern.edu/ethics](https://northwestern.edu/ethics)

While anonymous reports are accepted and will be reviewed, Northwestern's ability to address alleged sexual misconduct reported by anonymous sources is significantly limited.

You may report an incident to law enforcement and request a police investigation. See page 13 for Northwestern, Evanston, and Chicago police contact information.

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## Reporting obligation

All University employees (including student employees) and graduate students with teaching or supervisory authority are obligated to promptly report sexual misconduct of which they become aware in the scope of their work for the University to the Office of Equity, unless they are a resource not obligated to report as identified in the Policy on Institutional Equity. Note that the reporting obligation does not require a person experiencing harm to report the incident. Employees are encouraged to fulfill their reporting obligations by completing the Sexual Misconduct Reporting Form available at [bit.ly/NUReportSexualMisconduct](http://bit.ly/NUReportSexualMisconduct).

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## Privacy

Northwestern handles sexual misconduct reports discreetly, with information shared only with those who need to know in order to investigate and resolve the matter.

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

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## When a person does not want Northwestern to investigate or wants to remain anonymous

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 Office of Equity may determine that the University needs to proceed with an investigation or take other action based on concern for the safety or well-being of the broader University community. A list of factors that the Office of Equity will consider in making this determination is available in the Policy on Institutional Equity. Northwestern reserves the right to take appropriate action in such circumstances, including in cases when the individual reporting the misconduct chooses not to proceed; however, the University will not compel an individual to participate.

If you are unsure about whether you want to make a report or proceed with an investigation, a confidential resource can help you explore your options and provide additional resources, support, and information. See page 11 for a list of confidential resources.

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## Complaint investigation and resolution

Northwestern typically investigates complaints by meeting with the complainant, respondent, and witnesses and reviewing relevant evidence. The University uses the preponderance of the evidence standard, which means that if the evidence shows that it is more likely than not that sexual misconduct occurred, the respondent will be found responsible.

Investigations are usually conducted by staff from the Office of Equity, who are trained in handling sexual misconduct matters. See pages 8–9 for a flowchart of the sexual misconduct complaint resolution process.

Violations of the Policy on Institutional Equity may result in sanctions and corrective actions. These actions may include required training or counseling, warning, probation, suspension, expulsion, demotion, termination, or revocation of tenure.

Services or other measures to help remedy the effects of sexual misconduct and prevent recurrence may also be provided.

The irrelevant prior sexual history of the parties will not be considered as evidence in the investigation.

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## Advisor/legal counsel

An advisor is a person who is present to provide support to a complainant or respondent throughout an investigation and any sanctioning process. Each complainant and respondent may be accompanied by one advisor throughout the investigation and any sanctioning process, provided that the involvement of the advisor does not result in an undue delay of the process. It is the responsibility of each party to coordinate scheduling with their advisor for any meetings. An advisor may not speak, write, or otherwise communicate with an investigator, sanctioning panel member, or appeal reviewer on behalf of the complainant or respondent. Advisors may not engage in behavior or advocacy that harasses, abuses, or intimidates either party, a witness, or individuals involved in resolving the complaint. Advisors who do not abide by these guidelines may be excluded from the process.

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

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## Timeline

Though the University strives to resolve all cases in a prompt and timely manner, the timeline varies based on the circumstances of the case. Additionally, the timeline for a case may be affected by breaks in the academic calendar, availability of the parties and witnesses (including due to leave of absence), scope of the investigation, need for interim actions, and unforeseen or exigent circumstances. The parties will be periodically updated on the status of their case. In cases where there is a simultaneous law enforcement investigation, the University may need to temporarily delay its investigation while law enforcement gathers evidence. However, the University will generally proceed with its investigation and resolution of a complaint during any law enforcement investigation.

Although the length of each investigation will vary, the University strives to complete each investigation within 90 days of sending the written notice of investigation.

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## Truthfulness

All participants have the responsibility to be completely truthful with the information they share at all stages of the process.

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## Retaliation

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

Members of the community are prohibited from engaging in actions, directly or through others, which are aimed to deter a reasonable party or a witness from reporting sexual misconduct or participating in an investigation or hearing or done in retribution for such activities. A detailed definition of retaliation and examples of retaliatory conduct are provided in the University's Policy on Non-Retaliation.

The Northwestern community is strongly encouraged to report any potential incident of retaliation under this policy to the Office of Equity, which shall assess the matter and take appropriate actions to address such conduct.

## Overview of the Policy on Institutional Equity sexual misconduct complaint resolution process\*

The Office of Equity receives a report of sexual misconduct.

An Office of Equity staff member contacts the person who may have experienced sexual misconduct to provide information about resources and options and extend an invitation to meet.

The person decides whether or not to meet with the staff member.

The person chooses to meet. The staff member goes over resources and options. The person may request supportive measures and may request to proceed with resolution through investigation, educational response, or restorative resolution.

The person chooses not to meet or requests not to proceed with a resolution. The University typically can honor that request.

The Office of Equity conducts an initial inquiry to determine appropriate next steps.

Where an investigation has been opened, one or more investigators from the Office of Equity meet with the complainant to gather information about the concern. The complainant can suggest witnesses and provide evidence.

An Office of Equity staff member contacts the person who is alleged to have committed sexual misconduct (respondent) to notify them of the complaint, the resolution process, and the resources available to them.

One or more investigators meet with the respondent to get information. The respondent can suggest witnesses and provide evidence.

CONTINUE TO TOP OF PAGE 9

*\*This is the process for matters falling under the Policy on Institutional Equity. For Title IX sexual harassment matters, please see the Resource Guide on Title IX Sexual Harassment.*

One or more investigators collect information from the complainant, respondent, and relevant witnesses and review all evidence collected.

The complainant and respondent each have the opportunity to review a preliminary investigative report and provide additional information. In the event that new, relevant information is provided, the complainant and respondent have the opportunity to review a second preliminary investigative report and provide feedback on the new information.

The investigators complete the investigation and send the complainant and respondent a final investigative report containing all information collected, findings of fact, and a finding of whether there has been a policy violation.

When a policy violation is found and the respondent is a student, the Office of Equity will provide findings to the Office of Community Standards, which will determine sanctions and corrective actions in accordance with the procedures set forth in the *Student Handbook*.

When a policy violation is found and the respondent is a staff member, the findings will be forwarded to the Office of Human Resources and the respondent's manager. Any sanctions or corrective actions will be decided in accordance with the *Staff Handbook*.

When a policy violation is found and the respondent is a faculty member, the findings will be forwarded to the faculty member's dean and department chair and to the associate provost for faculty. Any sanctions or corrective actions will be determined in accordance with the *Faculty Handbook*.

Any party may appeal a finding or sanction. Information on how to appeal is included in the outcome letters provided to the parties.

*This flowchart is intended to provide a general overview. A full explanation of the sexual misconduct complaint resolution process can be found in the policy available at the URL below.*

---

## How to help someone who tells you about an incident of sexual misconduct

Individuals who have experienced sexual misconduct often respond in a variety of ways, including anger, sadness, confusion, or withdrawal.

**Listen:** Give the survivor your complete attention. Try not to interrupt or discuss your personal history.

**Support:** Survivors are often met with skepticism or disbelief. Offering nonjudgmental support and acknowledging the feelings of the survivor can help create a safe space for them to process the next steps.

**Refer:** You do not have to have all of the answers, and it is not your responsibility to fix the problem or determine what occurred. An important part of being helpful to a survivor is providing them with information about options and resources. Please refer survivors to the confidential resources and other options in this brochure.

If required under the Reporting Obligation section on page 5, be sure to report to the Office of Equity through the online form at [bit.ly/NUReportSexualMisconduct](https://bit.ly/NUReportSexualMisconduct).

### Do

Tell the survivor: This was not your fault. You have options.

Give the survivor options:

- to sit or stand
- to share or be silent
- to call confidential resources or to have you facilitate the connection

Say that the survivor is not alone.

Tell the survivor that resources are available to help.

Take care of yourself. Get support if you need it.

### Don't

Say that you know what the survivor is going through.

Ask questions that suggest blame, such as “Why were you drinking?” or “Why didn’t you get help sooner?”

Question whether the survivor is telling the truth.

Touch the survivor in any way without permission.

Panic. Take a deep breath and focus on the survivor.

---

## Confidential resources

Confidential resources are privileged to keep communications confidential, except in very limited situations (e.g., minors, imminent danger).

### **Center for Awareness, Response, and Education (CARE)**

(provides support, advocacy, and education to students)

847-491-2054

[northwestern.edu/care](http://northwestern.edu/care)

### **Counseling and Psychological Services (CAPS)**

(provides counseling services to students)

847-491-2151 (24 hours)

[northwestern.edu/counseling](http://northwestern.edu/counseling)

### **Office of Religious and Spiritual Life**

(provides spiritual guidance for students and other members of the University community)

847-491-7256

[northwestern.edu/religious-life](http://northwestern.edu/religious-life)

### **Employee Assistance Program**

(provides crisis intervention and short-term counseling to faculty and staff as well as their household family members)

[northwestern.edu/hr/benefits/well-being/programs/employee-assistance-program](http://northwestern.edu/hr/benefits/well-being/programs/employee-assistance-program)

### **Faculty Wellness Program**

(provides free consultations for faculty members to identify appropriate resources for personal and professional concerns)

[facultywellness@northwestern.edu](mailto:facultywellness@northwestern.edu)

[northwestern.edu/faculty-wellness](http://northwestern.edu/faculty-wellness)

For confidential resources located off campus, please see [northwestern.edu/sexual-misconduct/get-help/confidential-support.html](http://northwestern.edu/sexual-misconduct/get-help/confidential-support.html).

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## Office of Equity Staff (to report concerns to Northwestern)

**Jessica Galanos, Interim Title IX Coordinator**

847-467-6165

[jessica.galanos@northwestern.edu](mailto:jessica.galanos@northwestern.edu)

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## Other important contacts

**Janna Blais, Deputy Director of Athletics for Administration and Policy**

(for athletics compliance issues)

847-491-7893

[j-blais@northwestern.edu](mailto:j-blais@northwestern.edu)

**Julie Friend, Director of Global Safety and Security**

(for community members abroad)

847-467-3175

[julie.friend@northwestern.edu](mailto:julie.friend@northwestern.edu)

**Kathleen Hewett-Smith, Senior Associate Dean and Chief Academic Officer**

(for complaints on the Qatar campus)

+974 4454 5059

[kathleen.hewett-smith@northwestern.edu](mailto:kathleen.hewett-smith@northwestern.edu)

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## Emergency resources

### **Northwestern University Police Department**

(has officers who are specially trained to work with victims of sexual violence)  
847-491-3456 (Evanston)  
312-503-3456 (Chicago)  
northwestern.edu/up

### **Evanston Police**

911 or 847-866-5000  
cityofevanston.org/police

### **Chicago Police**

911 or 312-744-4000  
home.chicagopolice.org

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## Medical resources

### **Northwestern University Health Service**

847-491-8100 (Evanston)  
312-695-8134 (Chicago)

### **Northwestern Memorial Hospital (Chicago)**

312-926-2000

### **NorthShore University HealthSystem/ Evanston Hospital**

847-570-2111

### **AMITA Health Saint Francis Hospital (Evanston)**

847-316-4000

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## 24-hour services

### **Counseling and Psychological Services (CAPS)**

(provides counseling services to Northwestern students)  
847-491-2151 (24 hours)  
northwestern.edu/counseling

### **Evanston Domestic Violence Line (YWCA)**

877-718-1868

### **Rape, Abuse, and Incest National Network (RAINN)**

800-656-HOPE

### **Chicago Metro Rape Crisis Hotline (YWCA)**

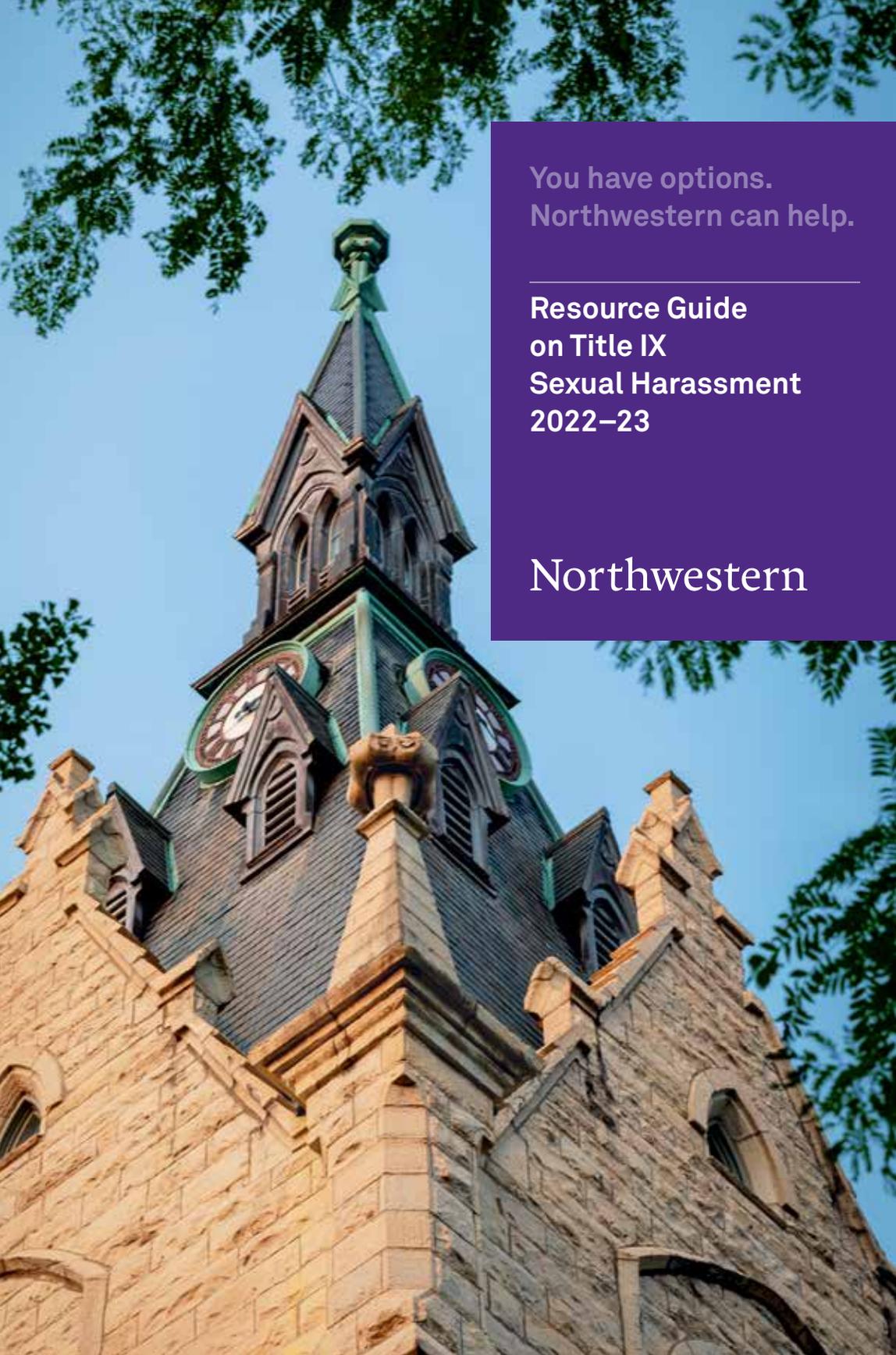
888-293-2080

### **Chicago Domestic Violence Line**

877-863-6338

**Office of Equity**  
**Northwestern University**

Fostering a culture of access, belonging, and accountability.



You have options.  
Northwestern can help.

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**Resource Guide  
on Title IX  
Sexual Harassment  
2022–23**

**Northwestern**

# Contents

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- 1** Definitions
- 2** Options
- 4** Reporting
- 6** Complaint Resolution Process
- 10** Help Someone Else
- 11** Resources and Help

Northwestern University does not discriminate or permit discrimination by any member of its community against any individual 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 services or in the educational programs or activities it operates. Harassment, whether verbal, physical, or visual, that is based on any of these characteristics is a form of discrimination. Further prohibited by law is discrimination against any employee and/or job applicant who chooses to inquire about, discuss, or disclose their own compensation or the compensation of another employee or applicant.

Northwestern University complies with federal and state laws that prohibit discrimination based on the protected categories listed above, including Title IX of the Education Amendments of 1972. Title IX requires educational institutions, such as Northwestern, to prohibit discrimination based on sex (including sexual harassment) in the University's educational programs and activities, including in matters of employment and admissions. In addition, Northwestern provides reasonable accommodations to qualified applicants, students, and employees with disabilities and to individuals who are pregnant.

Any alleged violations of this policy or questions with respect to nondiscrimination or reasonable accommodations should be directed to Northwestern's Office of Equity, 1800 Sherman Avenue, Suite 4-500, Evanston, Illinois 60208, 847-467-6165, [equity@northwestern.edu](mailto:equity@northwestern.edu).

Questions specific to sex discrimination (including sexual misconduct and sexual harassment) should be directed to Northwestern's Title IX Coordinator in the Office of Equity, 1800 Sherman Avenue, Suite 4-500, Evanston, Illinois 60208, 847-467-6165, [TitleIXCoordinator@northwestern.edu](mailto:TitleIXCoordinator@northwestern.edu).

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](http://www2.ed.gov/about/offices/list/ocr/complaintintro.html) or calling 800-421-3481. Inquiries about the application of Title IX to Northwestern may be referred to Northwestern's Title IX Coordinator, the United States Department of Education's Assistant Secretary for Civil Rights, or both.

**Northwestern University is committed to fostering an environment in which all members of our campus community are free from sexual misconduct of any form.**

---

## Title IX sexual harassment may include

**Quid pro quo sexual harassment:** an employee conditioning the provision of an aid, benefit, or service of the University on an individual's participation in unwelcome sexual conduct

**Hostile environment sexual harassment:** unwelcome conduct on the basis of sex determined by a reasonable person to be so severe, pervasive, and objectively offensive that it effectively denies a person equal access to Northwestern's education programs or activities

**Title IX sexual assault:** rape, fondling, incest, or statutory rape

**Title IX dating violence:** violence committed by a person who is or has been in a social relationship of a romantic or intimate nature with the victim

**Title IX domestic violence:** violence committed by a current or former spouse or intimate partner of the victim or by a person with whom the victim shares a child

**Title IX stalking:** engaging in a course of conduct directed at a specific person that would cause a reasonable person to fear for their safety or the safety of others or suffer emotional distress (e.g., threats, following, monitoring, communication)

The full definitions of these terms can be found in the Interim Policy on Title IX Sexual Harassment. Sexual misconduct falling outside of the purview of Title IX is addressed under the University's Policy on Institutional Equity.

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## Consent

Consent is present when clearly understandable words or actions manifest a **knowing, active, voluntary, and present and ongoing** agreement to engage in a specific sexual or intimate contact.

Consent is not present when an individual does not have the capacity to give consent due to age, alcohol, drugs, sleep, or other physical condition or disability.

---

## Title IX

Title IX is a federal civil rights law that prohibits discrimination on the basis of sex in federally funded educational programs and activities. Pursuant to US Department of Education regulations, the Interim Policy on Title IX Sexual Harassment applies to conduct occurring in the University's education programs or activities that is committed by a student, faculty member, staff member, or third party affiliate and that occurs in the United States on or after August 14, 2020. Conduct outside of the purview of the Interim Policy on Title IX Sexual Harassment may be addressed under the University's Policy on Institutional Equity.

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## If you believe that you have experienced Title IX sexual harassment, you have options.

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### Your options

- Speak with a confidential resource about your options, on or off campus. See page 11 for a list of Northwestern confidential resources.
  - Seek medical attention to treat any injuries, test for sexually transmitted infections, obtain emergency contraception (if needed), and/or perform a rape evidence collection procedure. A medical forensic exam can be performed up to seven days after an incident but is most effective if performed sooner. See page 13 for contact information.
  - Contact the police to file a report. See page 13 for contact information.
  - Contact the Title IX Coordinator or a Deputy Title IX Coordinator to report the incident to Northwestern, request any supportive measures, and explore resolution options (investigation, educational response, or restorative resolution). See page 12 for contact information.
  - Preserve any physical evidence you have in case you decide to report the incident at a later date.
- 

### Preserving evidence

Northwestern encourages individuals who have experienced Title IX sexual harassment to preserve evidence to the greatest extent possible as this will preserve more options for them in the future. Some suggestions include the following:

- Preserve evidence of electronic communications, such as text messages, pictures, and/or social media posts, by saving them and/or taking screenshots.
- If there is suspicion that a drink may have been drugged, inform a medical assistance provider and/or police as soon as possible so they can collect evidence (e.g., from the drink, through urine or blood sample).
- Because evidence that may be located on the body can dissipate quickly, consider going to a hospital or medical facility immediately to seek a medical exam. If possible, do not shower, brush teeth, use the bathroom, or eat before going to the hospital or seeking medical attention. Do not wash clothes or bedding.

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## Northwestern can help you

- Connect with on-campus and off-campus resources—including medical, counseling, immigration, student financial aid, and legal resources.
- File a police report or a complaint with the University or both.
- Request measures such as no-contact directives from the University, protective orders from a court, or housing, academic, working, or transportation accommodations.

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## Supportive measures

Supportive measures are nondisciplinary, nonpunitive individualized services offered as appropriate, as reasonably available, and without fee or charge to the complainant or the respondent before or after the filing of a formal complaint or where no formal complaint has been filed. Supportive measures may include:

- academic assistance
- housing or workspace relocation
- dining arrangements
- time off from class or work
- student financial aid arrangements
- transportation arrangements
- no-contact directives
- safety planning

Contact the Title IX Coordinator to request supportive measures (see page 12). Such measures will be kept confidential to the extent possible.

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## About reporting

You may choose whether to report Title IX sexual harassment to Northwestern, file a formal complaint with Northwestern, and/or report to law enforcement.

Title IX sexual harassment investigations can occur at the same time as police investigations.

Northwestern can help you file a police report.

Reporting to police does not obligate you to testify in court.

To encourage reporting, an individual who makes a good-faith report of Title IX sexual harassment that was directed at them or another person will **not** be subject to disciplinary action by the University for a conduct or policy violation that is related to and revealed in the sexual misconduct report or investigation, unless the University determines that the violation was serious and/or placed the health or safety of others at risk.

There is no time limit for reporting an incident. Reports should be made as soon as possible, as the passing of time makes a review of the evidence more difficult and the memories of involved parties may become less reliable.

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## Reporting options

You may report an incident to Northwestern and request supportive measures by contacting the Title IX Coordinator. See page 12 for contact information.

You may also report Title IX sexual harassment electronically:

### **Sexual Misconduct Reporting Form**

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

You may also file an anonymous report:

### **EthicsPoint**

866-294-3545

[northwestern.edu/ethics](https://northwestern.edu/ethics)

While anonymous reports are accepted and will be reviewed, Northwestern's ability to address alleged sexual misconduct reported by anonymous sources is significantly limited. You may report an incident to law enforcement and request a police investigation. See page 13 for Northwestern, Evanston, and Chicago police contact information.

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## Filing a formal complaint

A formal complaint is a document filed by a complainant or signed by the Title IX Coordinator alleging Title IX sexual harassment against a respondent and requesting that Northwestern investigate the allegation of Title IX sexual harassment. In order for Northwestern to proceed to an investigation, at the time of filing a formal complaint, a complainant must be participating in or attempting to participate in Northwestern's education programs or activities. A complainant may file a formal complaint with the

Office of Equity by using the complaint form available at [bit.ly/NUFormalTitleIXComplaint](https://bit.ly/NUFormalTitleIXComplaint) or by contacting the Title IX Coordinator in person, by regular mail, or by email. Contact information for the Title IX Coordinator is listed on page 12.

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## Privacy

Northwestern handles Title IX sexual harassment reports discreetly, with information shared only with those who need to know in order to investigate and resolve the matter.

All participants in an investigation will be informed that privacy 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. The University will not restrict the ability of either party to discuss the allegations under investigation. Witnesses and advisors will be asked to keep any information learned in an investigation meeting confidential, to the extent consistent with applicable law.

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## When a person does not want Northwestern to investigate or wants to remain anonymous

In cases where an individual reporting Title IX sexual harassment requests anonymity or does not wish to proceed with an investigation, the University will attempt to honor that request, but, in some cases, the Office of Equity 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. A list of factors that the Office of Equity will consider in making this determination is available in the Interim Policy on Title IX Sexual Harassment. Northwestern reserves the right to take appropriate action in such circumstances, including in cases when the individual reporting the misconduct chooses not to proceed; however, the University will not compel an individual to participate.

If you are unsure about whether you want to make a report or file a formal complaint, a confidential resource can help you explore your options and provide additional resources, support, and information. See page 11 for a list of confidential resources.

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## Reporting obligation

All University employees (including student employees) and graduate students with teaching or supervisory authority are obligated to promptly report sexual misconduct of which they become aware in the scope of their work for the University to the Office of Equity, unless they are a resource not obligated to report as identified in the Interim Policy on Title IX Sexual Harassment. Note that the reporting responsibility does not require a person experiencing harm to report the incident. Employees are encouraged to fulfill their reporting obligations by completing the Sexual Misconduct Reporting Form available at [bit.ly/NUReportSexualMisconduct](https://bit.ly/NUReportSexualMisconduct).

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### Title IX sexual harassment complaint investigation and resolution

Northwestern typically investigates complaints by meeting with the complainant, respondent, and witnesses and reviewing relevant evidence. Investigations are usually conducted by staff from the Office of Equity, who are trained in handling Title IX sexual harassment matters. Following the investigation, a decision maker will hold a hearing to determine whether a policy violation occurred. The University uses the preponderance of the evidence standard, which means that if the evidence shows that it is more likely than not that Title IX sexual harassment occurred, the respondent will be found responsible.

See pages 8–9 for a flowchart of the Title IX sexual harassment complaint resolution process.

Violations of the Interim Policy on Title IX Sexual Harassment may result in sanctions and corrective actions. These actions may include required training or counseling, warning, probation, suspension, expulsion, demotion, termination, or revocation of tenure.

Services or other measures to help remedy the effects of sexual misconduct and prevent recurrence may also be provided.

The irrelevant prior sexual history of the parties will not be considered as evidence.

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### Advisor/legal counsel

An advisor is a person who is present to provide support to a complainant or respondent throughout the complaint resolution process. Each complainant and respondent may be accompanied by one advisor throughout the process. The advisor may be, but is not required to be, an attorney. Except for conducting questioning during the hearing, the advisor will play a passive role and is not permitted to communicate on behalf of a party, insist that communication flow through the advisor, or communicate with the University about the matter. In the event a party's advisor of choice engages in material violation of these parameters, the University may preclude the advisor from further participation, in which case the party may select a new advisor of their choice.

While a party has the right to attend and participate in the hearing with an advisor, an advisor who materially and repeatedly violates the rules of the hearing in such a way as to be materially disruptive may be barred from further participation and/or have their participation limited, as the case may be, at the discretion of the decision maker.

In the event a party is not able to secure an advisor to attend the live hearing, the University will provide the party an advisor, without fee or charge, who will conduct questioning on behalf of the party at the hearing.

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## Timeline

Though the University strives to resolve all cases in a prompt and timely manner, the timeline varies based on the circumstances of the case. Additionally, the timeline for a case may be affected by breaks in the academic calendar, availability of the parties and witnesses (including due to leave of absence), scope of the investigation, need for interim actions, and unforeseen or exigent circumstances. The parties will be periodically updated on the status of their case. In cases where there is a simultaneous law enforcement investigation, the University may need to temporarily delay its investigation while law enforcement gathers evidence. However, the University will generally proceed with its investigation and resolution of a complaint during any law enforcement investigation. Information on the specific time frames for the complaint resolution process can be found in Section III of the Interim Policy on Title IX Sexual Harassment.

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## Truthfulness

All participants have the responsibility to be completely truthful with the information they share at all stages of the process.

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## Retaliation

Neither Northwestern nor any other person may intimidate, threaten, coerce, or discriminate against any individual for the purpose of interfering with any right or privilege secured by Title IX and its implementing regulations or the Interim Policy on Title IX Sexual Harassment or because the individual has, in good faith, made a report or complaint, testified, assisted, or participated or refused to participate in any manner in an investigation, proceeding, or hearing under this policy. Intimidation, threats, coercion, or discrimination, including charges against an individual for code of conduct violations that do not involve sex discrimination or sexual harassment but arise out of the same facts or circumstances as a report or complaint of sex discrimination, or a report or formal complaint of Title IX sexual harassment, for the purpose of interfering with any right or privilege secured by Title IX or the Interim Policy on Title IX Sexual Harassment, constitutes Title IX retaliation. A detailed definition of retaliation and examples of retaliatory conduct are provided in the University's Policy on Non-Retaliation.

Complaints of Title IX retaliation may be made by contacting the Title IX Coordinator. The University will process any report or complaint of Title IX retaliation in the same manner as a report or complaint of sex discrimination under the University's Policy on Institutional Equity.

## Overview of the Title IX sexual harassment complaint resolution process

A formal complaint is filed by the complainant or signed by the Title IX Coordinator.

The Title IX Coordinator or designee contacts the complainant to provide information about resources and options and extend an invitation to meet.

The Office of Equity conducts an initial inquiry to determine whether the allegations, if substantiated, would rise to the level of a violation of University policy.

If the alleged conduct passes initial inquiry, the office will proceed with a formal investigation and hearing.

If the alleged conduct would not constitute a violation of the Interim Policy on Title IX Sexual Harassment, did not occur in the University's education programs or activities, or did not occur in the US, the complaint must be dismissed. A written notice of dismissal will be issued to both parties.

The Office of Equity provides to the parties a written notice of investigation, with information about the complaint resolution process and details of the allegations.

The investigators interview the complainant, respondent, and relevant witnesses. The investigators identify and gather evidence.

At the conclusion of evidence gathering, the investigators give the parties an equal opportunity to inspect and review evidence obtained. Each party can submit up to 20 pages of feedback within 10 days after the evidence is made available for review.

After the parties have provided their written response, the investigators will create a written investigative report summarizing the relevant evidence collected and will provide this report to each party and advisor.

The Title IX Coordinator appoints a decision maker to conduct the hearing. The parties are notified of the decision maker's appointment. The parties are given a deadline to submit responses to the investigative report, a date for a prehearing conference, and a date for the hearing.

CONTINUE TO TOP OF PAGE 9

# Complaint Resolution Process

The decision maker holds a prehearing conference with the parties to discuss the hearing procedures. Following the prehearing conference, notices of attendance are sent to any witnesses who are University employees or students, advising them of the date and time of the hearing.

The hearing is conducted live, with simultaneous participation by the parties and their advisors. The decision maker will rely on relevant evidence available through the investigation and hearing in making the determination of responsibility.

After the hearing is complete, the decision maker will evaluate all evidence and reach a determination as to whether there has been a policy violation. If the decision maker determines that the respondent is responsible, the decision maker will consult with the appropriate University personnel, who will determine any sanctions to be imposed.

For student respondents: In the event a policy violation is found, the decision maker will consult with a UHAS sanctioning panel comprising three faculty or staff members.

For staff respondents: In the event a policy violation is found, the decision maker will consult the HR business partner and the respondent's manager or unit leader.

For faculty respondents: In the event a policy violation is found, the decision maker will consult with a faculty sanctioning panel.

The decision maker issues a written determination regarding responsibility. In matters where a respondent has been found responsible, the determination will include any sanctions imposed on the respondent and any remedies provided to the complainant. This written decision will include information on the appeal procedure.

Any party may appeal a finding or sanction. Information on how to appeal is included in the written determination provided to the parties and can be found in Section III(I) of the Interim Policy on Title IX Sexual Harassment.

*This flowchart is intended to provide a general overview. A full explanation of the Title IX sexual harassment complaint resolution process can be found in the policy available at the URL below.*

---

# How to help someone who tells you about an incident of sexual misconduct

Individuals who have experienced sexual misconduct often respond in a variety of ways, including anger, sadness, confusion, or withdrawal.

**Listen:** Give the survivor your complete attention. Try not to interrupt or discuss your personal history.

**Support:** Survivors are often met with skepticism or disbelief. Offering nonjudgmental support and acknowledging the feelings of the survivor can help create a safe space for them to process the next steps.

**Refer:** You do not have to have all of the answers, and it is not your responsibility to fix the problem or determine what occurred. An important part of being helpful to a survivor is providing them with information about options and resources. Please refer survivors to the confidential resources and other options in this brochure.

If required under the Reporting Obligation section on page 5, be sure to report to the Office of Equity through the online form at [bit.ly/NUReportSexualMisconduct](https://bit.ly/NUReportSexualMisconduct).

### Do

Tell the survivor: This was not your fault. You have options.

Give the survivor options:

- to sit or stand
- to share or be silent
- to call confidential resources or to have you facilitate the connection

Say that the survivor is not alone.

Tell the survivor that resources are available to help.

Take care of yourself. Get support if you need it.

### Don't

Say that you know what the survivor is going through.

Ask questions that suggest blame, such as “Why were you drinking?” or “Why didn’t you get help sooner?”

Question whether the survivor is telling the truth.

Touch the survivor in any way without permission.

Panic. Take a deep breath and focus on the survivor.

## Confidential resources

Confidential resources are privileged to keep communications confidential, except in very limited situations (e.g., minors, imminent danger).

### **Center for Awareness, Response, and Education (CARE)**

(provides support, advocacy, and education to students)

847-491-2054

[northwestern.edu/care](http://northwestern.edu/care)

### **Counseling and Psychological Services (CAPS)**

(provides counseling services to students)

847-491-2151 (24 hours)

[northwestern.edu/counseling](http://northwestern.edu/counseling)

### **Office of Religious and Spiritual Life**

(provides spiritual guidance for students and other members of the University community)

847-491-7256

[northwestern.edu/religious-life](http://northwestern.edu/religious-life)

### **Employee Assistance Program**

(provides crisis intervention and short-term counseling to faculty and staff as well as their household family members)

[northwestern.edu/hr/benefits/well-being/programs/employee-assistance-program](http://northwestern.edu/hr/benefits/well-being/programs/employee-assistance-program)

### **Faculty Wellness Program**

(provides free consultations for faculty members to identify appropriate resources for personal and professional concerns)

[facultywellness@northwestern.edu](mailto:facultywellness@northwestern.edu)

[northwestern.edu/faculty-wellness](http://northwestern.edu/faculty-wellness)

### **Office of the Ombudsperson**

(provides confidential and informal assistance for resolving University-related concerns, is independent of the University's formal administrative structure, and considers all sides of an issue in a neutral manner)

847-467-2430

[ombuds@northwestern.edu](mailto:ombuds@northwestern.edu)

[northwestern.edu/ombuds](http://northwestern.edu/ombuds)

For confidential resources located off campus, please see [northwestern.edu/sexual-misconduct/get-help/confidential-support.html](http://northwestern.edu/sexual-misconduct/get-help/confidential-support.html).

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## **Title IX Coordinator (to report concerns to Northwestern)**

**Jessica Galanos, Interim Title IX Coordinator**

847-467-6165

[jessica.galanos@northwestern.edu](mailto:jessica.galanos@northwestern.edu)

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## Emergency resources

### **Northwestern University Police Department**

(has officers who are specially trained to work with victims of sexual violence)  
847-491-3456 (Evanston)  
312-503-3456 (Chicago)  
northwestern.edu/up

### **Evanston Police**

911 or 847-866-5000  
cityofevanston.org/police

### **Chicago Police**

911 or 312-744-4000  
home.chicagopolice.org

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## Medical resources

### **Northwestern University Health Service**

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312-695-8134 (Chicago)

### **Northwestern Memorial Hospital (Chicago)**

312-926-2000

### **NorthShore University HealthSystem/ Evanston Hospital**

847-570-2111

### **AMITA Health Saint Francis Hospital (Evanston)**

847-316-4000

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## 24-hour services

### **Counseling and Psychological Services (CAPS)**

(provides counseling services to Northwestern students)  
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northwestern.edu/counseling

### **Evanston Domestic Violence Line (YWCA)**

877-718-1868

### **Rape, Abuse, and Incest National Network (RAINN)**

800-656-HOPE

### **Chicago Metro Rape Crisis Hotline (YWCA)**

888-293-2080

### **Chicago Domestic Violence Line**

877-863-6338

**Office of Equity**  
**Northwestern University**

Fostering a culture of access, belonging, and accountability.

Attachment D:

Campus Training Information

## **Campus Training, Education and Awareness**

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; trauma informed; inclusive of diverse communities and identities; sustainable; responsive to community needs; informed by research or assessed for value, effectiveness, and outcome; and considerate of environmental risk and protective factors as they occur on the individual, relationship, institutional, community, and societal levels.

In 2021, the University provided new faculty and staff with valuable education and resources through an online course. The interactive web-based course educated participants about sexual misconduct, the associated laws and University policies, and available resources at Northwestern. Topics such as sex discrimination, sexual assault, sexual harassment, sexual exploitation, dating and domestic violence, and stalking were covered. Additionally, all incoming undergraduate students were required to complete an online sexual assault prevention program prior to arriving at Northwestern and all other students were asked to complete an online module during the year.

In 2021, Northwestern's Office of Equity and Center for Awareness, Response, and Education (CARE) provided training for staff, faculty, and student leaders about responding to incidents of sexual violence, bystander intervention, and other topics on both the Evanston and Chicago campuses. Additionally, in affiliation with CARE, two peer educator groups, Sexual Health and Assault Peer Educators (SHAPE) and Men Against Rape and Sexual Assault (MARS) provided numerous trainings throughout the year to student groups, including fraternities and sororities. Information on the trainings offered during the 2021 calendar year appears below.

**TRAININGS PROVIDED OR ORGANIZED BY THE OFFICE OF EQUITY – 2021 CALENDAR YEAR**

<b>Name of Program</b>	<b>Brief Description</b>	<b>Date</b>	<b>Target Audience</b>	<b>Number of Attendees</b>
Equity Series Session 3	One Session of a Six-Part Series focused on the general functions and services of the Office of Equity, prevention efforts, and a guided discussion of the social constructs and impacts of sexual and gender-based misconduct and violence.	1/13/2021	Graduate Students (Art History)	10
A Framework and Tools for Interrupting Harm	Bystander Intervention and Risk Reduction Training	1/15/2021	Faculty (Obstetrics)	35
Equity Series Session 4	One Session of a Six-Part Series focused on the general functions and services of the Office of Equity, prevention efforts, and a guided discussion of the social constructs and impacts of sexual and gender-based misconduct and violence.	1/15/2021	Staff and Faculty (Center for Health Information Partnerships)	20
Equity 101 + Cultivating a Culture of Healthy Sexuality	Training on types of sexual misconduct, reporting options and obligations, and campus-based resources. Training to increase awareness of ways to express personal sexuality while respecting the sexuality of others within the context of healthy relationships.	1/19/2021	Undergraduate Students (Dolphin Show)	33
Equity 101	Training on types of sexual misconduct, reporting options and obligations, and campus-based resources.	1/21/2021	Graduate Students (Department of Sociology Mentors)	9
Caring for Ourselves and Others	Personal and Relationship-Based Respect and Emotional Wellbeing	1/21/2021	Caring for Ourselves and Others Staff	16

			Dialogue Series	
A Framework and Tools for Interrupting Harm	Bystander Intervention and Risk Reduction Training	1/21/2021	Faculty (OBGYN Physicians)	20
Equity 101 + Cultivating a Culture of Healthy Sexuality	Training on types of sexual misconduct, reporting options and obligations, and campus-based resources. Training to increase awareness of ways to express personal sexuality while respecting the sexuality of others within the context of healthy relationships.	1/21/2021	Undergraduate Students (Dolphin Show)	33
Equity 101 (with CARE)	Training on types of sexual misconduct, reporting options and obligations, and campus-based resources.	1/25/2021	Undergraduate Students (Compass Mentors)	10
Equity 101 + Cultivating a Culture of Healthy Sexuality	Training on types of sexual misconduct, reporting options and obligations, and campus-based resources with a specific focus on exploring sexuality and healthy relationships	1/25/2021	Undergraduate Students (Dolphin Show)	33
Equity 101	Training on types of sexual misconduct, reporting options and obligations, and campus-based resources.	1/27/2021	Staff (Facilities DEI Committee)	10
Equity Series Session 1	One Session of a Six-Part Series focused on the general functions and services of the Office of Equity, prevention efforts, and a guided discussion of the social constructs and impacts of sexual and gender-based misconduct and violence.	1/27/2021	Staff (Undergraduate Admissions)	30
Unconscious Bias	Programming exploring social constructs and self-reflection on unconscious bias related to gender,	1/27/2021	Staff and Faculty. Open Enrollment: Learning	15

	sexual orientation, race, religion, etc.		Organizational Development	
Equity 101 + Cultivating a Culture of Healthy Sexuality	Training on types of sexual misconduct, reporting options and obligations, and campus-based resources. Training to increase awareness of ways to express personal sexuality while respecting the sexuality of others within the context of healthy relationships.	1/27/2021	Undergraduate Students (Dolphin Show)	33
Listening Session 3	Office of Equity led safe space for dialogue and feedback.	1/28/2021	Staff and Faculty (Institute for Sexual and Gender Minority Health and Wellbeing)	20
Equity Series Session 1	One Session of a Six-Part Series focused on the general functions and services of the Office of Equity, prevention efforts, and a guided discussion of the social constructs and impacts of sexual and gender-based misconduct and violence.	1/28/2021	Faculty (Theatre)	20
Equity 101 + Envisioning Inclusion-keynote	Keynote and Training on types of sexual misconduct, reporting options and obligations, and campus-based resources.	1/28/2021	Graduate Students (TGS Let's Talk Series)	90
Equity 101	Training on types of sexual misconduct, reporting options and obligations, and campus-based resources.	1/28/2021	Staff (Provost Office Unit Directors)	25
Equity 101	Training on types of sexual misconduct, reporting options and obligations, and campus-based resources.	1/28/2021	Undergraduate Students (SHAPE new members)	15

Creating a Culture of Healthy Sexuality (with CARE)	Training to increase awareness of ways to express personal sexuality while respecting the sexuality of others within the context of healthy relationships.	1/31/2021	Undergraduate Students (Boomshaka Dance Group)	20
Unconscious Bias	Programming exploring social constructs and self-reflection on unconscious bias related to gender, sexual orientation, race, religion, etc.	February 2-3 2021	Staff and Faculty: Open Enrollment: Learning Organization al Development	21
Equity Series Session 1	One Session of a Six-Part Series focused on the general functions and services of the Office of Equity, prevention efforts, and a guided discussion of the social constructs and impacts of sexual and gender-based misconduct and violence.	2/3/2021	Faculty (Computer Science Diversity Committee)	25
Listening Session 4	Office of Equity led safe space for dialogue and feedback.	2/4/2021	Staff and Faculty (Institute for Sexual and Gender Minority Health and Wellbeing)	20
Equity Series Session 1	One Session of a Six-Part Series focused on the general functions and services of the Office of Equity, prevention efforts, and a guided discussion of the social constructs and impacts of sexual and gender-based misconduct and violence.	2/9/2021	Faculty and Staff (Center for Comparative Health)	30

Equity Series Session 4	One Session of a Six-Part Series focused on the general functions and services of the Office of Equity, prevention efforts, and a guided discussion of the social constructs and impacts of sexual and gender-based misconduct and violence.	2/10/2021	Faculty (Art History)	10
Equity 101 + Creating Inclusive Spaces	Training on types of sexual misconduct, reporting options and obligations, and campus-based resources.	2/12/2021	Staff (Office of Fellowships)	7
Equity 101	Training on types of sexual misconduct, reporting options and obligations, and campus-based resources.	2/12/2021	Undergraduate students (SPEAK)	7
Gender Inclusive Spaces	Training for staff to assist in creating safe spaces for individuals of all genders.	2/15/2021	Staff (Public Health Admin Team)	25
Equity 101	Training on types of sexual misconduct, reporting options and obligations, and campus-based resources.	2/18/2021	Graduate Students (New Teaching Assistants)	1
Equity Series Session 5	One Session of a Six-Part Series focused on the general functions and services of the Office of Equity, prevention efforts, and a guided discussion of the social constructs and impacts of sexual and gender-based misconduct and violence.	2/19/2021	Faculty and staff (Center for Health Information Partnerships)	20
Gender and Consent	Program exploring consent and barriers to consent as it relates to gender and gender stereotypes	2/23/2021	Undergraduate Students (Gender and the Life Course Class (SESP))	35
A Framework and Tools for Interrupting Harm	Bystander Intervention and Risk Reduction Training	2/23/2021	Staff (ARD Talent Management)	50

Equity Series Session 2	One Session of a Six-Part Series focused on the general functions and services of the Office of Equity, prevention efforts, and a guided discussion of the social constructs and impacts of sexual and gender-based misconduct and violence.	2/24/2021	(Staff) Undergraduate Admissions	30
Equity Series Session 2	One Session of a Six-Part Series focused on the general functions and services of the Office of Equity, prevention efforts, and a guided discussion of the social constructs and impacts of sexual and gender-based misconduct and violence.	2/25/2021	Faculty (Theatre)	20
Bystander Intervention Scenario Practice (Social Justice Education + CARE collaboration)	Bystander Intervention and Risk Reduction Training	2/26/2021	Faculty and staff (NU Bystander Intervention Scenario Practice Group)	10
Equity Series Session 2	One Session of a Six-Part Series focused on the general functions and services of the Office of Equity, prevention efforts, and a guided discussion of the social constructs and impacts of sexual and gender-based misconduct and violence.	3/3/2021	Faculty (Computer Science Diversity Committee)	20
Unconscious Bias	Programming exploring social constructs and self-reflection on unconscious bias related to gender, sexual orientation, race, religion, etc.	March 2-3 2021	Staff and Faculty: Open Enrollment: Learning Organization al Development	18
Equity 101 + Reporting	Training on types of sexual misconduct, reporting	3/11/2021	Undergraduate Students	10

	options and obligations, and campus-based resources.		(NSFP Board Members)	
Virtual information booth with Equity resources	Sharing resources and information about the Office of Equity and related services, reporting options, and supportive measures.	3/12/2021	Faculty, Staff, Graduate Students (Women in STEM Conference)	13
Panel: Role of Health Care in Addressing Sexual Violence	Role specific training to aid health care professionals in response to individual reports of sexual violence and to create prevention efforts	3/23/2021	Staff (CHETchat)	30
Equity 101	Training on types of sexual misconduct, reporting options and obligations, and campus-based resources.	3/30/2021	Undergraduate Students (FYE Tonight-Athletes)	85
Identifying and Interrupting Microaggressions	Bystander Intervention and Risk Reduction Training	3/30/2021	Undergraduate Students (NuBonD)	16
Equity 101	Training on types of sexual misconduct, reporting options and obligations, and campus-based resources.	3/31/2021	Undergraduate Students (Navigating Northwestern cohort)	34
Equity 101	Training on types of sexual misconduct, reporting options and obligations, and campus-based resources.	3/31/2021	Staff (Libraries)	70
Equity 101	Training on types of sexual misconduct, reporting options and obligations, and campus-based resources.	4/1/2021	Staff (ARD Events)	4
Sexual Assault Awareness Month 2021: Restorative Justice	Training on restorative justice within the context of sexual violence and gender based discrimination	4/5/2021	Students, Staff, Faculty: (SAAM Opening Keynote: Annie Buth)	20

Equity 101	Training on types of sexual misconduct, reporting options and obligations, and campus-based resources.	4/7/2021	Faculty (Department Chairs)	24
Equity Series Session 3	One Session of a Six-Part Series focused on the general functions and services of the Office of Equity, prevention efforts, and a guided discussion of the social constructs and impacts of sexual and gender-based misconduct and violence.	4/7/2021	Faculty (Computer Science Diversity Committee)	20
Equity Series Session 3	One Session of a Six-Part Series focused on the general functions and services of the Office of Equity, prevention efforts, and a guided discussion of the social constructs and impacts of sexual and gender-based misconduct and violence.	4/7/2021	Staff and Faculty (Center for Community Health)	20
Sexual Assault Awareness Month 2021: Indigenous Discussion Space in Partnership with MSA and CARE	Office of Equity led safe space for dialogue and feedback.	4/13/2021	Students	10
Equity 101	Training on types of sexual misconduct, reporting options and obligations, and campus-based resources.	4/14/2021	Undergraduate Students (Res college exec officers)	87
Sexual Assault Awareness Month 2021: BDSM and Consent Event with Cruel Valentine in Partnership with CARE	Exploring consent within BDSM and other consensual sexual activities	4/14/2021	Students	20
Unconscious Bias	Programming exploring social constructs and self-reflection on unconscious bias related to gender, sexual orientation, race, religion, etc.	April 20-21 2021	Staff and Faculty: Open Enrollment: Learning Organization al Development	12

Equity Series Session 6	One Session of a Six-Part Series focused on the general functions and services of the Office of Equity, prevention efforts, and a guided discussion of the social constructs and impacts of sexual and gender-based misconduct and violence.	4/21/2021	Faculty (Art History)	2
Equity 101 + Policy updates	Training on types of sexual misconduct, reporting options and obligations, and campus-based resources.	4/26/2021	Undergraduate Students (SHAPE Generals)	20
Sexual Assault Awareness Month 2021: Keynote on Disability and Transformative Justice in Partnership with AccessibleNU	Session exploring sexual assault and transformative justice opportunities through the lens of individuals with disabilities.	4/27/2021	Students, Staff, Faculty (SAAM Keynote)	30
Equity 101	Training on types of sexual misconduct, reporting options and obligations, and campus-based resources.	4/27/2021	Graduate students, Faculty (Bachman Lab)	20
Equity Series Session 4	One Session of a Six-Part Series focused on the general functions and services of the Office of Equity, prevention efforts, and a guided discussion of the social constructs and impacts of sexual and gender-based misconduct and violence.	4/28/2021	Staff (Undergraduate Admissions)	20
Equity Series Session 4	One Session of a Six-Part Series focused on the general functions and services of the Office of Equity, prevention efforts, and a guided discussion of the social constructs and impacts of sexual and gender-based misconduct and violence.	4/29/2021	Faculty (Theatre)	15

Office of Equity 101 & Cultivating and Organizational Culture of Healthy Sexuality	<p>Training on types of sexual misconduct, reporting options and obligations, and campus-based resources.</p> <p>Training to increase awareness of ways to express personal sexuality while respecting the sexuality of others within the context of healthy relationships.</p>	5/3/2021	Undergraduate Students (Evanston Young Artists)	7
Creating a Culture of Healthy Sexuality	<p>Training to increase awareness of ways to express personal sexuality while respecting the sexuality of others within the context of healthy relationships.</p>	5/4/2021	Undergraduate students (FSL Risk Managers)	30
Equity 101	<p>Booth with information about sexual misconduct, reporting options and obligations, and campus-based resources.</p>	5/4/2021	Undergraduate and Graduate Students (Student Orgs and Activities Resource Fair)	8
Equity Series Session 4	<p>One Session of a Six-Part Series focused on the general functions and services of the Office of Equity, prevention efforts, and a guided discussion of the social constructs and impacts of sexual and gender-based misconduct and violence.</p>	5/5/2021	Faculty (Computer Science Diversity Committee)	25
Equity 101	<p>Training on types of sexual misconduct, reporting options and obligations, and campus-based resources.</p>	5/5/2021	Faculty (African American Studies)	8
Equity Series Session 4	<p>One Session of a Six-Part Series focused on the general functions and services of the Office of Equity, prevention efforts, and a guided discussion of the social constructs and impacts of sexual and</p>	5/5/2021	Faculty (Computer Science Diversity Committee)	15

	gender-based misconduct and violence.			
Equity 101 + Reporting	Training on types of sexual misconduct, reporting options and obligations, and campus-based resources.	5/12/2021	Staff (Religious and Spiritual Life)	5
Unconscious Bias	Programming exploring social constructs and self-reflection on unconscious bias related to gender, sexual orientation, race, religion, etc.	May 11 and 12 2021	Staff and Faculty: Open Enrollment: Learning Organization al Development	9
Bystander Intervention Practice Group- May	Bystander Intervention and Risk Reduction Training	May 14 2021	Staff and Faculty (Bystander Intervention Practice Facilitation)	14
Equity Series Session 1	One Session of a Six-Part Series focused on the general functions and services of the Office of Equity, prevention efforts, and a guided discussion of the social constructs and impacts of sexual and gender-based misconduct and violence.	May 14 2021	Faculty (Art Theory and Practice)	15
Equity 101 + Conflict Management	Training on types of sexual misconduct, reporting options and obligations, and campus-based resources.	5/24/2021	Graduate Students (Materials Science and Engineering)	10
Identifying and Interrupting Microaggressions	Bystander Intervention and Risk Reduction Training	6/28/2021	Faculty and Graduate Students (Bachman Lab)	20

Intro to Office of Equity	Sharing resources and information about the Office of Equity and related services, reporting options, and supportive measures.	8/3/2021	Undergraduate Students (New Students and Family Programs)	All New Students
Becoming an Active Bystander	Bystander Intervention and Risk Reduction Training	8/5/2021	Staff (Libraries)	8
Equity 101	Training on types of sexual misconduct, reporting options and obligations, and campus-based resources.	8/16/2021	Staff (Residence Life)	5
Equity 101	Training on types of sexual misconduct, reporting options and obligations, and campus-based resources.	8/19/2021	Third Parties (Hillel Center)	9
Equity 101	Training on types of sexual misconduct, reporting options and obligations, and campus-based resources.	8/24/2021	Staff (Career Services)	78
Equity 101	Training on types of sexual misconduct, reporting options and obligations, and campus-based resources.	8/26/2021	Graduate Students (Physical Therapy and Human Movement Sciences)	23
Equity 101	Training on types of sexual misconduct, reporting options and obligations, and campus-based resources.	8/30/2021	Undergraduate Students (NU Marching Band)	154
Equity 101	Training on types of sexual misconduct, reporting options and obligations, and campus-based resources.	9/7/2021	Staff (Residence Life)	117
Equity 101 Responsible Employee	Training on types of sexual misconduct, reporting options and obligations, and campus-based resources.	9/7/2021	Graduate and Undergraduate Students (Resident Advisors)	117
New Student Resource Fair - Tabling	Sharing resources and information about the Office of Equity and related	9/13/2021	Graduate Students	300

	services, reporting options, and supportive measures.			
Parent & Family Resource Fair - Tabling	Sharing resources and information about the Office of Equity and related services, reporting options, and supportive measures.	9/14/2021	New students and families	300
Equity 101 Responsible Employee	Training on types of sexual misconduct, reporting options and obligations, and campus-based resources.	9/14/2021	Graduate and Undergraduate Students	30
Equity 101 Responsible Employee	Training on types of sexual misconduct, reporting options and obligations, and campus-based resources.	9/15/2021	Graduate and Undergraduate Students	20
Equity 101	Training on types of sexual misconduct, reporting options and obligations, and campus-based resources.	9/16/2021	Graduate and Undergraduate Students	14
Equity 101 Responsible Employee	Training on types of sexual misconduct, reporting options and obligations, and campus-based resources.	9/16/2021	Graduate Students: Teaching Assistants	25
New students - Tabling	Sharing resources and information about the Office of Equity and related services, reporting options, and supportive measures.	9/17/2021	Incoming Graduate and Undergraduate Students	1500
Equity 101	Training on types of sexual misconduct, reporting options and obligations, and campus-based resources.	9/20/2021	Graduate and Undergraduate Students	34
Equity 101	Training on types of sexual misconduct, reporting options and obligations, and campus-based resources.	9/24/2021	Graduate and Undergraduate Students	110
LGBTQIA+ Faculty and Staff Welcome: Tabling	Sharing resources and information about the Office of Equity and related services, reporting options, and supportive measures.	9/27/2021	Faculty and staff	20

LGBTQIA+ Faculty and Staff Welcome: Tabling	Sharing resources and information about the Office of Equity and related services, reporting options, and supportive measures.	9/28/2021	Faculty and staff	20
Brief info-session on Equity services	Sharing resources and information about the Office of Equity and related services, reporting options, and supportive measures.	9/28/2021	Undergraduate Students	10
LGBTQIA+ Faculty and Staff Welcome: Tabling	Sharing resources and information about the Office of Equity and related services, reporting options, and supportive measures.	9/29/2021	Faculty and staff	20
LGBTQIA+ Faculty and Staff Welcome Reception	Sharing resources and information about the Office of Equity and related services, reporting options, and supportive measures.	9/29/2021	Faculty and staff	40
Brief info-session on Equity services	Sharing resources and information about the Office of Equity and related services, reporting options, and supportive measures.	9/30/2021	Graduate and Undergraduate Students	10
Scenario practice for Manager Foundations Series	Training for Bystander Intervention and Risk Reduction Training	10/5/2021	Staff	35
Equity 101	Training on types of sexual misconduct, reporting options and obligations, and campus-based resources.	10/6/2021	Undergraduate Students	25
Equity 101	Training on types of sexual misconduct, reporting options and obligations, and campus-based resources.	10/8/2021	Graduate and Undergraduate Students	5
Resource fair	Sharing resources and information about the Office of Equity and related services, reporting options, and supportive measures.	10/13/2021	Faculty and staff	15
Frameworks and Tools for Interrupting Harm	Bystander Intervention and Risk Reduction Training	10/19/2021	Graduate and Undergraduate Students	4

Equity 101 Responsible Employee	Training on types of sexual misconduct, reporting options and obligations, and campus-based resources.	10/20/2021	Faculty and staff	11
Cultivating Gender Inclusive Spaces	Training for Faculty and Staff to support the creation of diverse environments that create safe places for expression of personal identity and gender inclusivity.	10/21/2021	Faculty and staff	7
Equity 101	Training on types of sexual misconduct, reporting options and obligations, and campus-based resources.	10/28/2021	Staff	4
Equity 101 Responsible Employee	Training on types of sexual misconduct, reporting options and obligations, and campus-based resources.	11/1/2021	Undergraduate Students	11
Equity 101 and specific inquiry	Training on types of sexual misconduct, reporting options and obligations, and campus-based resources.	11/2/2021	Staff	5
Frameworks and Tools for Interrupting Harm	Bystander Intervention and Risk Reduction Training	11/11/2021	Graduate Students	24
Frameworks and Tools for Interrupting Harm	Bystander Intervention and Risk Reduction Training	11/16/2021	Faculty and staff	23
Cultivating Gender Inclusive Spaces	Training for Faculty and Staff to support the creation of diverse environments that create safe places for expression of personal identity and gender inclusivity.	11/17/2021	Faculty and staff	9
TSG Resource Fair	Sharing resources and information about the Office of Equity and related services, reporting options, and supportive measures.	11/17/2021	Third Parties-Prospective Graduate Students	11
Equity 101	Training on types of sexual misconduct, reporting options and obligations, and campus-based resources.	11/18/2021	Faculty and Staff	25

Cultivating Positive Sexuality	Training to increase awareness of ways to express personal sexuality while respecting the sexuality of others within the context of healthy relationships.	11/30/2021	Undergraduate Students	60
Equity 101	Training on types of sexual misconduct, reporting options and obligations, and campus-based resources.	12/1/2021	Staff	25
Bystander intervention practice	Training for Bystander Intervention and Risk Reduction Training	12/1/2021	Staff	5
Equity 101+Consent	Training on types of sexual misconduct, reporting options and obligations, and campus-based resources.	12/2/2021	Undergraduate Students	18
Cultivating Positive Sexuality	Training to increase awareness of ways to express personal sexuality while respecting the sexuality of others within the context of healthy relationships.	12/6/2021	Undergraduate Students	50
Canvas module Equity 101 for staff	Training on types of sexual misconduct, reporting options and obligations, and campus-based resources.	12/6/2021	Staff	100

**TRAININGS PROVIDED OR ORGANIZED BY CARE (CENTER FOR AWARENESS, RESPONSE AND EDUCATION), SHAPE (SEXUAL HEALTH AND ASSAULT PEER EDUCATORS) AND MARS (MEN AGAINST RAPE AND SEXUAL ASSAULT) – 2021 CALENDAR YEAR**

Name of Program	Brief Description	Date	Target Audience	Number of Attendees
Sexual Health First Year Experience for NU Football	Sexual Health resources for football team	1/4/2021	Students generally in their role as students. Examples would be fraternity or sorority members, residence hall members, Student Body attendees, participants	50

			of an open workshop, etc.	
MLK Dream Week Keynote: Mariame Kaba	Keynote from abolitionist and organizer, Mariame Kaba	1/13/2021	Students generally in their role as students. Examples would be fraternity or sorority members, residence hall members, Student Body attendees, participants of an open workshop, etc., Staff and/or Faculty, Community members	1400
The Psychology of Students in the UHAS Process	UHAS Panel training for respondents	1/13/2021	Staff and/or Faculty	20
SHAPE Training: Intro	Introductory training	1/14/2021	Student Leaders in the capacity of their roles. Examples would be RA's, PA's, PHA Presidents, Student Org Leaders, SHAPE or MARS members, etc.	10
SHAPE training: Consent and Alcohol	Consent and Alcohol	1/19/2021	Student Leaders in the capacity of their roles. Examples would be RA's, PA's, PHA Presidents, Student Org Leaders, SHAPE or MARS members, etc.	10
SHAPE training: Supporting Survivors	Supporting survivors	1/21/2021	Student Leaders in the capacity of their roles. Examples would be RA's, PA's, PHA Presidents, Student Org Leaders, SHAPE or MARS members, etc.	10
SHAPE training: SJE	Creating an inclusive community with SJE	1/26/2021	Student Leaders in the capacity of their roles. Examples would be RA's, PA's, PHA Presidents, Student Org Leaders, SHAPE or MARS members, etc.	10

SHAPE Training: Title IX	Title IX and OE overview	1/28/2021	Student Leaders in the capacity of their roles. Examples would be RA's, PA's, PHA Presidents, Student Org Leaders, SHAPE or MARS members, etc.	10
SHAPE Training: Intersectional Feminism	A lecture from Justin Mann from African American Studies	2/2/2021	Student Leaders in the capacity of their roles. Examples would be RA's, PA's, PHA Presidents, Student Org Leaders, SHAPE or MARS members, etc.	10
Unlearning Sex Q&A	Promotion of the Unlearning Sex documentary	2/2/2021	Students generally in their role as students. Examples would be fraternity or sorority members, residence hall members, Student Body attendees, participants of an open workshop, etc., Staff and/or Faculty	15
SHAPE Training: Domestic and Relationship Violence	Presentation on RV, DV, stalking from KAN-WIN	2/4/2021	Student Leaders in the capacity of their roles. Examples would be RA's, PA's, PHA Presidents, Student Org Leaders, SHAPE or MARS members, etc.	10
NU Bystander intervention Practice Scenario Group	Bystander Intervention scenario practice for staff/faculty	2/5/2021	Staff and/or Faculty	8
Healthy Relationships	Healthy relationships for Black Mentorship Program	2/7/2021	Students generally in their role as students. Examples would be fraternity or sorority members, residence hall members, Student Body attendees, participants of an open workshop, etc.	25
SHAPE Training: Neurobiology of Trauma	Training on trauma and the brain from Resilience	2/9/2021	Student Leaders in the capacity of their roles. Examples would be RA's, PA's, PHA	10

			Presidents, Student Org Leaders, SHAPE or MARS members, etc.	
SHAPE Training: Kink and Pleasure	Kink and pleasure with Early to Bed	2/11/2021	Student Leaders in the capacity of their roles. Examples would be RA's, PA's, PHA Presidents, Student Org Leaders, SHAPE or MARS members, etc.	10
NU Open Bystander Intervention Training	Bystander Intervention program for whoever wants to attend	2/11/2021	Student Leaders in the capacity of their roles. Examples would be RA's, PA's, PHA Presidents, Student Org Leaders, SHAPE or MARS members, etc., Students generally in their role as students. Examples would be fraternity or sorority members, residence hall members, Student Body attendees, participants of an open workshop, etc., Staff and/or Faculty, Community partners	71
Bring your bae to generals day	An generals meeting open to all NU students	2/15/2021	Students generally in their role as students. Examples would be fraternity or sorority members, residence hall members, Student Body attendees, participants of an open workshop, etc.	31
SHAPE Training: Apna Ghar	Training on accessing care from local resources	2/16/2021	Student Leaders in the capacity of their roles. Examples would be RA's, PA's, PHA Presidents, Student Org Leaders, SHAPE or MARS members, etc.	10
SHAPE Training: Working with Hospitals, Police, and the Law	Northwest CASA	2/18/2021	Student Leaders in the capacity of their roles. Examples would be RA's, PA's, PHA	10

			Presidents, Student Org Leaders, SHAPE or MARS members, etc.	
SHAPE Training: Contraceptives, STIs, and Abortion	Planned Parenthood	2/23/2021	Student Leaders in the capacity of their roles. Examples would be RA's, PA's, PHA Presidents, Student Org Leaders, SHAPE or MARS members, etc.	10
Gender and the Life Class Workshop	Gender and sexuality workshop for course	2/23/2021	Students generally in their role as students. Examples would be fraternity or sorority members, residence hall members, Student Body attendees, participants of an open workshop, etc.	42
SHAPE Training: Yes Means Yes and Presentations	Going over readings and SHAPE presentations	2/25/2021	Student Leaders in the capacity of their roles. Examples would be RA's, PA's, PHA Presidents, Student Org Leaders, SHAPE or MARS members, etc.	10
NU Bystander Intervention Scenario Practice Group	scenario practice for bystander intervention	2/26/2021	Staff and/or Faculty	7
Supporting Survivors	SHAPE facilitators led a discussion through our Supporting Survivors presentation.	2/27/2021	Students generally in their role as students. Examples would be fraternity or sorority members, residence hall members, Student Body attendees, participants of an open workshop, etc.	9
Sexual Harassment Resources Learning Session	Discussion of sexual harassment resources	3/1/2021	Students generally in their role as students. Examples would be fraternity or sorority members, residence hall members, Student Body attendees, participants of an open workshop, etc.	28

SHAPE Training: Presentation and facilitation skills	Presentation and facilitation skills	3/2/2021	Student Leaders in the capacity of their roles. Examples would be RA's, PA's, PHA Presidents, Student Org Leaders, SHAPE or MARS members, etc.	120
WW Board Meeting	Training on TND and supporting survivors	3/11/2021	Student Leaders in the capacity of their roles. Examples would be RA's, PA's, PHA Presidents, Student Org Leaders, SHAPE or MARS members, etc.	15
Courageous Conversations with and About Boys	div 51 of APA program on masculinity	3/12/2021	Student Leaders in the capacity of their roles. Examples would be RA's, PA's, PHA Presidents, Student Org Leaders, SHAPE or MARS members, etc., Staff and/or Faculty	72
Sexual Health 101	SHAPE facilitators led a discussion through our Sexual Health 101 presentation.	3/14/2021	Students generally in their role as students. Examples would be fraternity or sorority members, residence hall members, Student Body attendees, participants of an open workshop, etc.	25
Bystander Intervention Practice Scenario Group	Scenario practice with group	3/19/2021	Staff and/or Faculty	12
CHET Chat: Role of HealthCare in Addressing SA	How can healthcare address sexual violence issues	3/23/2021	Student Leaders in the capacity of their roles. Examples would be RA's, PA's, PHA Presidents, Student Org Leaders, SHAPE or MARS members, etc., Students generally in their role as students. Examples would be fraternity or sorority members, residence hall members, Student Body attendees, participants of an open workshop,	100

			etc., Staff and/or Faculty	
FYE - Sexual Health and Sexual Violence Education	workshop for NU student athletes and their first year experience	3/30/2021	Student Leaders in the capacity of their roles. Examples would be RA's, PA's, PHA Presidents, Student Org Leaders, SHAPE or MARS members, etc., Students generally in their role as students. Examples would be fraternity or sorority members, residence hall members, Student Body attendees, participants of an open workshop, etc.	100
Rape Culture 101	SHAPE facilitators led a discussion through our Rape Culture 101 presentation.	4/8/2021	Students generally in their role as students. Examples would be fraternity or sorority members, residence hall members, Student Body attendees, participants of an open workshop, etc.	20
NUBI Molecular Biosciences	Bystander Intervention for MB	4/15/2021	Student Leaders in the capacity of their roles. Examples would be RA's, PA's, PHA Presidents, Student Org Leaders, SHAPE or MARS members, etc., Staff and/or Faculty	142
Sex After Sexual Assault with Eva Ball	a work shop on sex after sexual assault	4/19/2021	Students generally in their role as students. Examples would be fraternity or sorority members, residence hall members, Student Body attendees, participants	20

			of an open workshop, etc.	
NUBI Planetary & Earth Sciences	Bystander Intervention Programming for Planetary & Earth Sciences	4/21/2021	Students generally in their role as students. Examples would be fraternity or sorority members, residence hall members, Student Body attendees, participants of an open workshop, etc.	18
MARS SAAM Event	MARS Masculinity workshop for SAAM	4/21/2021	Students generally in their role as students. Examples would be fraternity or sorority members, residence hall members, Student Body attendees, participants of an open workshop, etc.	10
Supporting Survivors	SHAPE facilitators led a discussion through our Supporting Survivors presentation.	4/28/2021	Students generally in their role as students. Examples would be fraternity or sorority members, residence hall members, Student Body attendees, participants of an open workshop, etc.	15
Bystander Intervention Scenario Practice Group	Bystander Intervention for staff/faculty	4/30/2021	Staff and/or Faculty	6
MARS Workshop	MARS Workshop	5/1/2021	Students generally in their role as students. Examples would be fraternity or sorority members, residence hall members, Student Body attendees, participants of an open workshop, etc.	20
MARS Workshop	MARS Workshop	5/1/2021	Students generally in their role as students. Examples would be fraternity or sorority members, residence hall	0

			members, Student Body attendees, participants of an open workshop, etc.	
Rape Culture 101	SHAPE facilitators led a discussion through our Rape Culture 101 presentation.	5/4/2021	Students generally in their role as students. Examples would be fraternity or sorority members, residence hall members, Student Body attendees, participants of an open workshop, etc.	30
May Harm Reduction Workshop	consent and supporting survivors for FSL students	5/4/2021	Student Leaders in the capacity of their roles. Examples would be RA's, PA's, PHA Presidents, Student Org Leaders, SHAPE or MARS members, etc., Students generally in their role as students. Examples would be fraternity or sorority members, residence hall members, Student Body attendees, participants of an open workshop, etc.	89
NUBI Feinberg Asher Center	Bystander Intervention for Asher	5/12/2021	Student Leaders in the capacity of their roles. Examples would be RA's, PA's, PHA Presidents, Student Org Leaders, SHAPE or MARS members, etc., Students generally in their role as students. Examples would be fraternity or sorority members, residence hall members, Student Body attendees, participants of an open workshop, etc., Staff and/or Faculty	45

MARS Workshop	MARS Workshop	5/12/2021	Students generally in their role as students. Examples would be fraternity or sorority members, residence hall members, Student Body attendees, participants of an open workshop, etc.	24
Student Body Zoomed In	Part 2 of Student Body	5/18/2021	Students generally in their role as students. Examples would be fraternity or sorority members, residence hall members, Student Body attendees, participants of an open workshop, etc., Staff and/or Faculty	10
Student Body Zoomed In	Updated Version of SB detailing pandemic life	5/19/2021	Students generally in their role as students. Examples would be fraternity or sorority members, residence hall members, Student Body attendees, participants of an open workshop, etc.	0
Sexual Pleasure 101	SHAPE facilitators led a discussion through our Sexual Pleasure 101 presentation.	5/21/2021	Students generally in their role as students. Examples would be fraternity or sorority members, residence hall members, Student Body attendees, participants of an open workshop, etc.	10
Supporting Survivors	SHAPE facilitators led a discussion through our Supporting Survivors presentation.	5/23/2021	Students generally in their role as students. Examples would be fraternity or sorority members, residence hall members, Student Body attendees, participants of an open workshop, etc.	40

Decolonizing Porn	an even by Kali Sudhra of Erika Lust Productions	5/25/2021	Students generally in their role as students. Examples would be fraternity or sorority members, residence hall members, Student Body attendees, participants of an open workshop, etc.	20
MARS Workshop	MARS Workshop	6/1/2021	Students generally in their role as students. Examples would be fraternity or sorority members, residence hall members, Student Body attendees, participants of an open workshop, etc.	0
Bystander Intervention Practice Scenario Group	Bystander Intervention Practice with Staff & Faculty	6/11/2021	Staff and/or Faculty	18
Eight Annual Student Affairs Assessment Conference	Research presentation on MARS program	6/22/2021	Staff and/or Faculty	40
Guest Speaker; Career Exploration	Discussion with students about career trajectory	8/3/2021	Students generally in their role as students. Examples would be fraternity or sorority members, residence hall members, Student Body attendees, participants of an open workshop, etc.	38
New Student Orientation	Student Orientation for NUQ	8/6/2021	Students generally in their role as students. Examples would be fraternity or sorority members, residence hall members, Student Body attendees, participants of an open workshop, etc.	0
DOS Training	Training for Res Life	8/18/2021	Staff and/or Faculty	25
Bystander Intervention Scenario Practice Group	Bystander Intervention practice group for staff/faculty	8/19/2021	Staff and/or Faculty	12

Introduction to CARE	Introduction to CARE Services	8/24/2021	Staff and/or Faculty	6
Understanding Murdered and Missing Indigenous Women	SAAM event about the history and realities of MMIW	9/4/2021	Students generally in their role as students. Examples would be fraternity or sorority members, residence hall members, Student Body attendees, participants of an open workshop, etc., Staff and/or Faculty, community	15
CARE/Equity Training	Training for RA's and Staff	9/7/2021	Student Leaders in the capacity of their roles. Examples would be RA's, PA's, PHA Presidents, Student Org Leaders, SHAPE or MARS members, etc., Staff and/or Faculty	0
Open & Honest Communication	Teaching Students how to communicate about sexual needs and preferences	9/11/2021	Students generally in their role as students. Examples would be fraternity or sorority members, residence hall members, Student Body attendees, participants of an open workshop, etc., Staff and/or Faculty	42
PA Camp	TND Training for PA's	9/11/2021	Student Leaders in the capacity of their roles. Examples would be RA's, PA's, PHA Presidents, Student Org Leaders, SHAPE or MARS members, etc., Staff and/or Faculty	120
Grad Orientation Fair	Resource fair	9/13/2021	Students generally in their role as students. Examples would be fraternity or sorority members, residence hall members, Student Body attendees, participants of an open workshop, etc.	500

Student Body Facilitator Training	Student Body TND training for MARS/SHAPE facilitators	9/14/2021	Student Leaders in the capacity of their roles. Examples would be RA's, PA's, PHA Presidents, Student Org Leaders, SHAPE or MARS members, etc.	16
Parent and Family Resource Fair	Fair	9/14/2021	parents and families	500
Trauma and Stress	Training for staff	9/14/2021	Staff and/or Faculty	10
CAPS Orientation Training	Trauma/PTSD Training for CAPS interns	9/15/2021	Staff and/or Faculty	8
Student Body	Student Body TND	9/17/2021	Student Leaders in the capacity of their roles. Examples would be RA's, PA's, PHA Presidents, Student Org Leaders, SHAPE or MARS members, etc., Students generally in their role as students. Examples would be fraternity or sorority members, residence hall members, Student Body attendees, participants of an open workshop, etc.	1160
New Student Resource Fair	Resource fair	9/17/2021	Students generally in their role as students. Examples would be fraternity or sorority members, residence hall members, Student Body attendees, participants of an open workshop, etc.	2000
Student Body TND	Student Body TND	9/19/2021	Student Leaders in the capacity of their roles. Examples would be RA's, PA's, PHA Presidents, Student Org Leaders, SHAPE or MARS members, etc., Students generally in their role as students. Examples would be	1160

			fraternity or sorority members, residence hall members, Student Body attendees, participants of an open workshop, etc.	
Student Body Facilitator Debrief	Debrief for our MARS, SHAPE, & PA facilitators	9/21/2021	Student Leaders in the capacity of their roles. Examples would be RA's, PA's, PHA Presidents, Student Org Leaders, SHAPE or MARS members, etc.	15
NU Bystander Intervention	Bystander Intervention workshop for first year students	9/27/2021	Student Leaders in the capacity of their roles. Examples would be RA's, PA's, PHA Presidents, Student Org Leaders, SHAPE or MARS members, etc., Students generally in their role as students. Examples would be fraternity or sorority members, residence hall members, Student Body attendees, participants of an open workshop, etc., Staff and/or Faculty	81
NU Bystander Intervention	Bystander Intervention workshop for Feinberg M1 students	9/28/2021	Student Leaders in the capacity of their roles. Examples would be RA's, PA's, PHA Presidents, Student Org Leaders, SHAPE or MARS members, etc., Students generally in their role as students. Examples would be fraternity or sorority members, residence hall members, Student Body attendees, participants of an open workshop, etc., Staff and/or Faculty	81

Feminist First Years	Intro to CARE for Feminist First Year program	9/28/2021	Students generally in their role as students. Examples would be fraternity or sorority members, residence hall members, Student Body attendees, participants of an open workshop, etc.	20
Mariame Kaba Student Q&A	Student session with Mariame Kaba	10/14/2021	Student Leaders in the capacity of their roles. Examples would be RA's, PA's, PHA Presidents, Student Org Leaders, SHAPE or MARS members, etc., Students generally in their role as students. Examples would be fraternity or sorority members, residence hall members, Student Body attendees, participants of an open workshop, etc.	30
NU Bystander Intervention	Bystander Intervention Program for Genetic Counseling Students	10/14/2021	Students generally in their role as students. Examples would be fraternity or sorority members, residence hall members, Student Body attendees, participants of an open workshop, etc.	40
Anti Asian Workshop	Workshop on addressing anti-asian rhetoric/behaviors	10/15/2021	Staff and/or Faculty	27
Trauma in the Queer Community	workshop on SV in queer spaces	10/19/2021	Students generally in their role as students. Examples would be fraternity or sorority members, residence hall members, Student Body attendees, participants of an open workshop, etc.	250

NU Bystander Intervention Scenario Practice Group	NUBI Program for Staff/Faculty	10/20/2021	Staff and/or Faculty	12
ETHS Bears Program	Healthy masculinity program with community youth	10/25/2021	Students generally in their role as students. Examples would be fraternity or sorority members, residence hall members, Student Body attendees, participants of an open workshop, etc.	25
Faculty Well Being: Collective Trauma	Workshop/group for faculty	10/27/2021	Staff and/or Faculty	20
SES Compass Mentor SHAPE/Equity Workshop	Compass Mentor Training	11/1/2021	Student Leaders in the capacity of their roles. Examples would be RA's, PA's, PHA Presidents, Student Org Leaders, SHAPE or MARS members, etc.	17
Understanding Trauma in the Classroom	training for faculty	11/3/2021	Staff and/or Faculty	35
ETHS Healthy Masculinity Program	Healthy Masculinities for Camp Kuumba	11/8/2021	Student Leaders in the capacity of their roles. Examples would be RA's, PA's, PHA Presidents, Student Org Leaders, SHAPE or MARS members, etc., Staff and/or Faculty	24
Dept. Physical Therapy Bystander Intervention Training	NUBI for Physical therapy	11/10/2021	Students generally in their role as students. Examples would be fraternity or sorority members, residence hall members, Student Body attendees, participants of an open workshop, etc.	25
Community Conversations	Bystander program with Feinberg students	11/11/2021	Students generally in their role as students. Examples would be fraternity or sorority members, residence hall members, Student Body attendees, participants	45

			of an open workshop, etc.	
Supporting Male Survivors	training	11/15/2021	Staff and/or Faculty	35
NU Bystander Intervention Scenario Practice Group	Scenario Practice group for staff/faculty members	11/17/2021	Staff and/or Faculty	10
ETHS Healthy Masculinity Program	Healthy Masculinity Program	11/22/2021	Students generally in their role as students. Examples would be fraternity or sorority members, residence hall members, Student Body attendees, participants of an open workshop, etc.	22
NU Bystander Intervention Practice Scenario Group	Staff/Faculty ongoing practice group	12/1/2021	Staff and/or Faculty	8
The Psychology of Students in the UHAS Process	Panel Training for Respondents	12/14/2021	Staff and/or Faculty	20
The Psychology of Students in the UHAS Process	training for panelists in uhas	12/14/2021	Staff and/or Faculty	30