

Annual Report

September 1, 2021-August 31, 2022

I. Introduction

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

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

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

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

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

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

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

II. Report Response

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

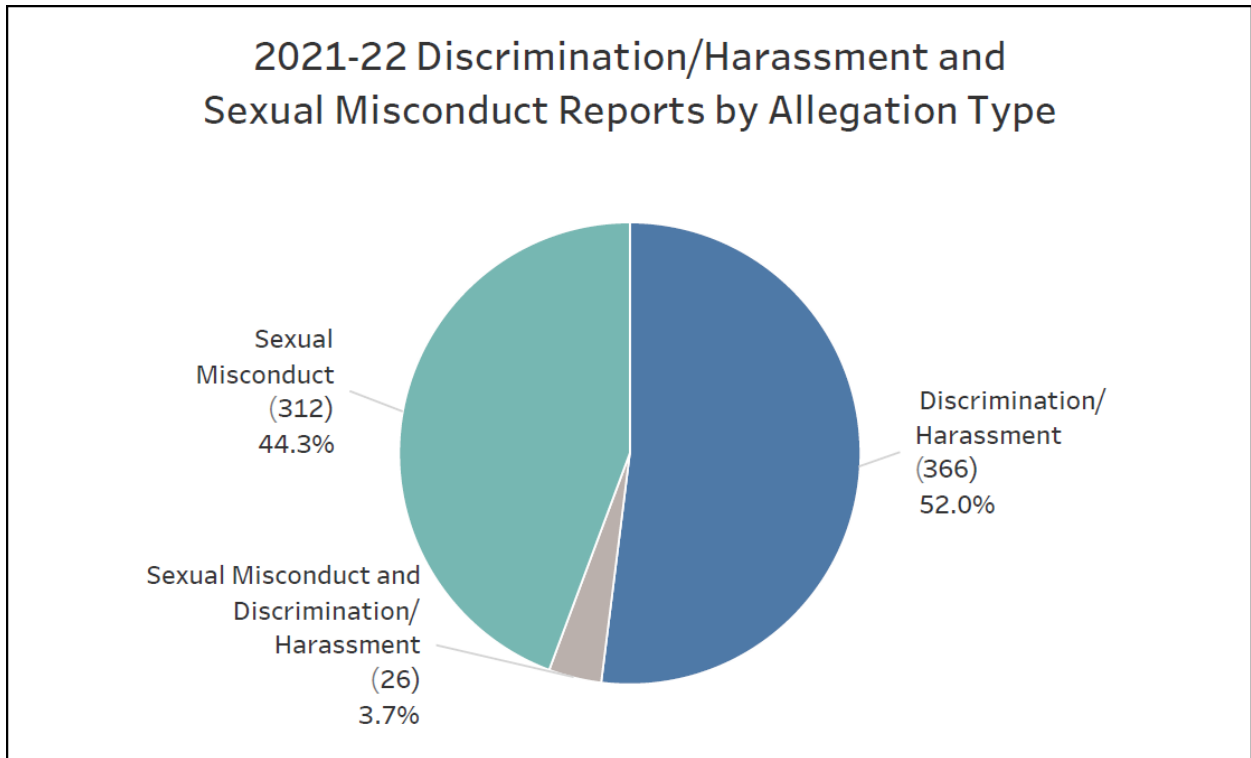
When an incident of alleged sexual misconduct, discrimination or harassment is reported to the University, whether it is reported in person, by email, electronically, anonymously, or through another person, the Office of Equity sends an outreach email to the potentially impacted person(s) to offer information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

The following charts present data on the number of sexual misconduct, discrimination, and harassment reports received by the Office of Equity, the nature of those reports, and their disposition during the academic year beginning September 1, 2021, and ending August 31, 2022.

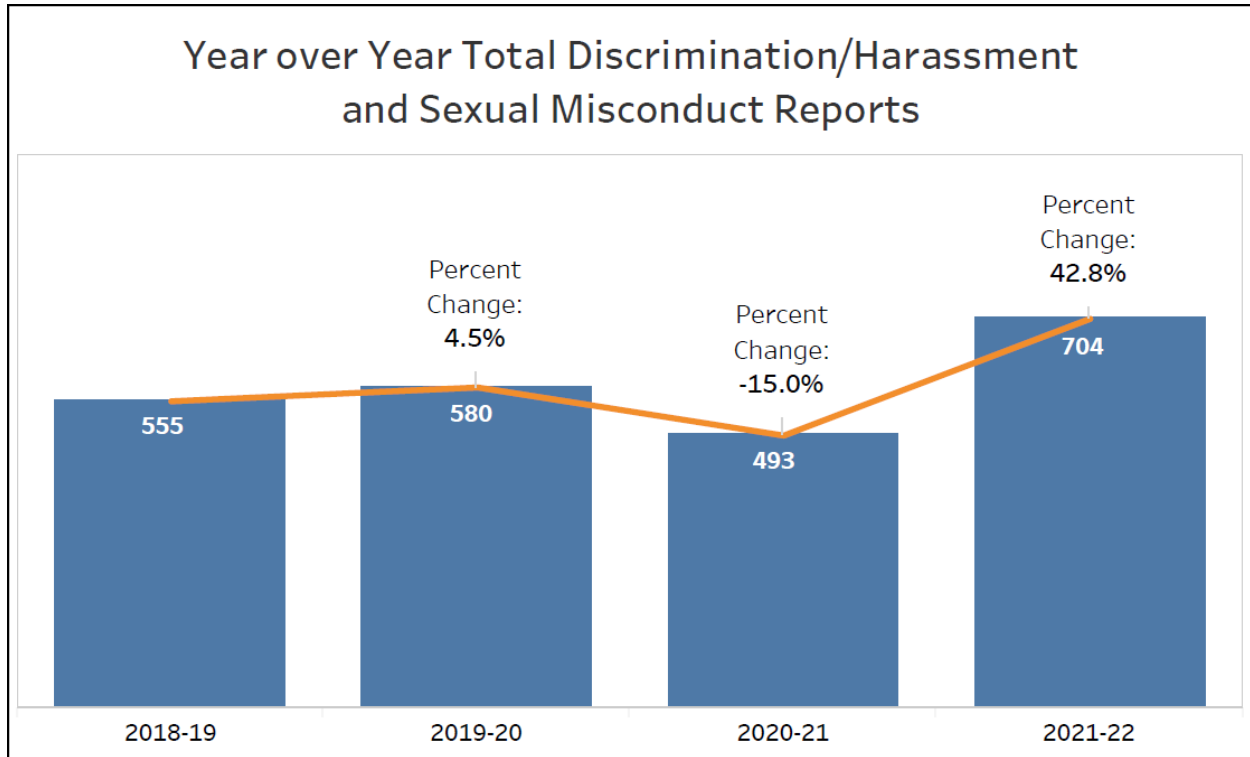
² Prior to August 14, 2020, matters involving allegations of discrimination and harassment committed by students were handled by the Office of Student Conduct.

A. Distribution of All Reports by Type of Allegation

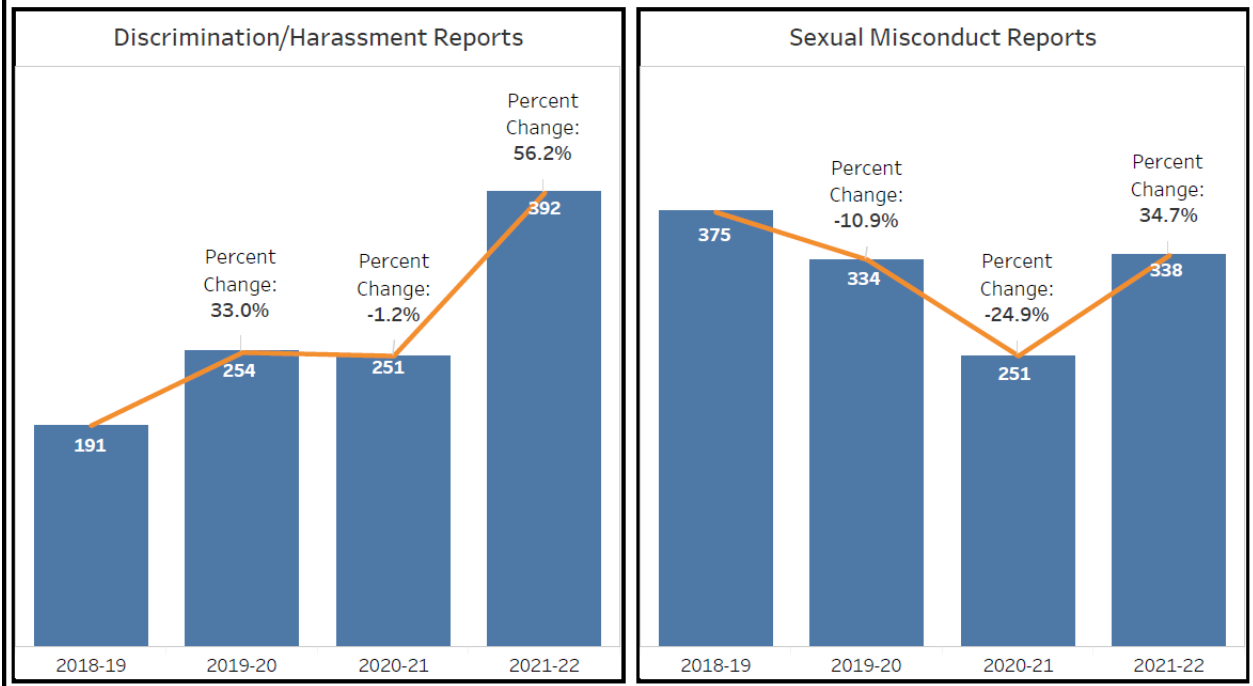
During the 2021-2022 academic year, the Office of Equity received 704 reports. The following chart illustrates the distribution by type of allegation of the reports received by the Office of Equity.



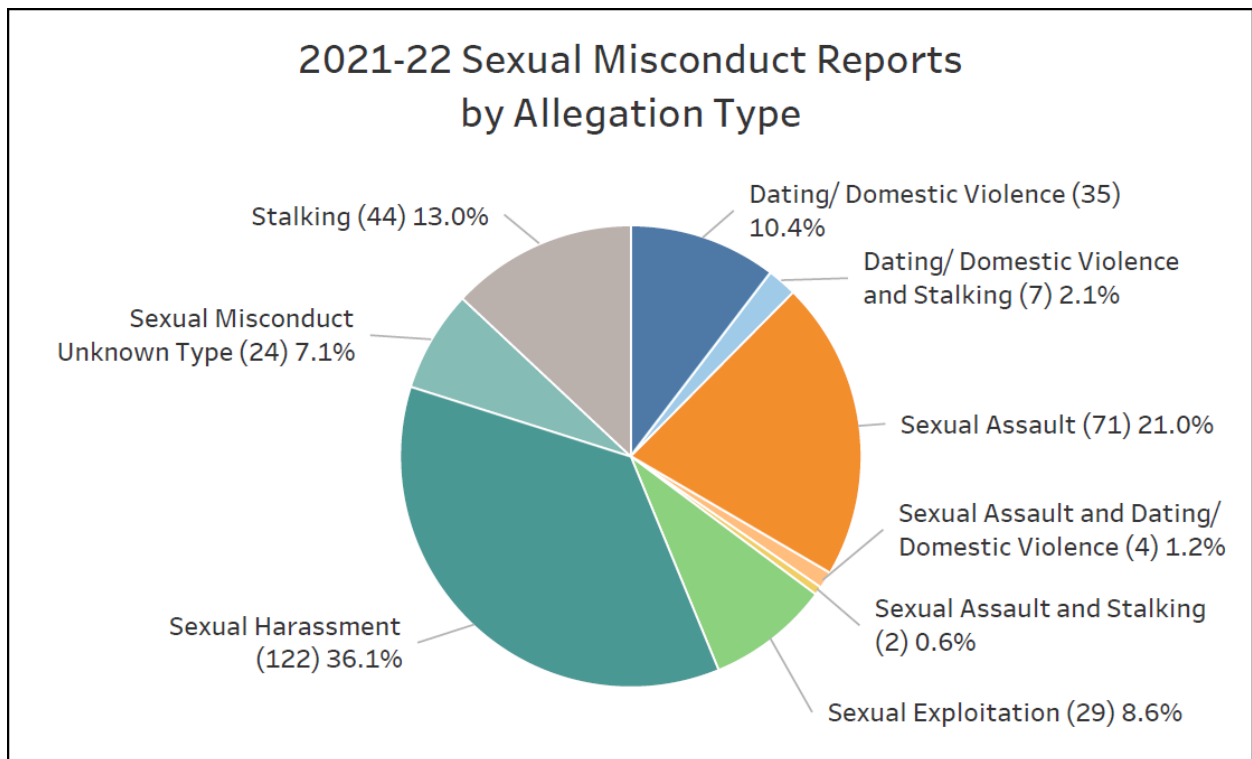
The Office of Equity saw an increase in reports in the 2021-22 academic year as compared to the previous (2020-21) year. As the following charts represent, the overall number of reports increased by 211 from 493 in 2020-21, to 704 in 2021-22. The number of discrimination and harassment reports increased by 115, from 251 in 2020-21, to 366 in 2021-22. The number of sexual misconduct reports also increased by 87 reports, from 251 reports in 2020-21 to 338 reports in 2021-22. Note that the number of sexual misconduct reports in 2021-22 is similar to the number reported in 2019-20, and that the overall driver of increased reporting appears to be complaints related to discrimination and harassment.



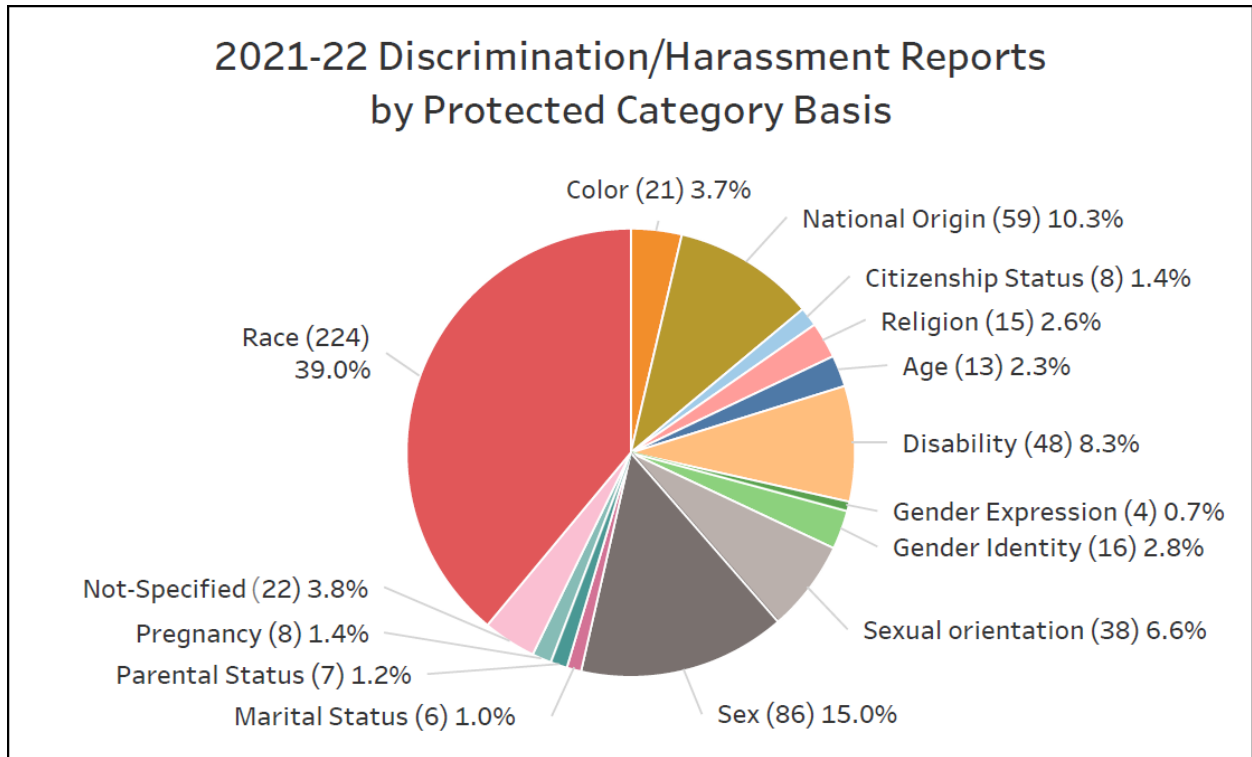
Year over Year Total Reports Separated by Allegation Type



The following chart illustrates the type of sexual misconduct allegations received in 2021-22. Categories were added to reflect combined reports of sexual assault, dating/domestic violence, and stalking. When a report involved other combinations of sexual misconduct offenses (e.g. sexual assault and sexual harassment), it was categorized on the basis of the primary allegation.

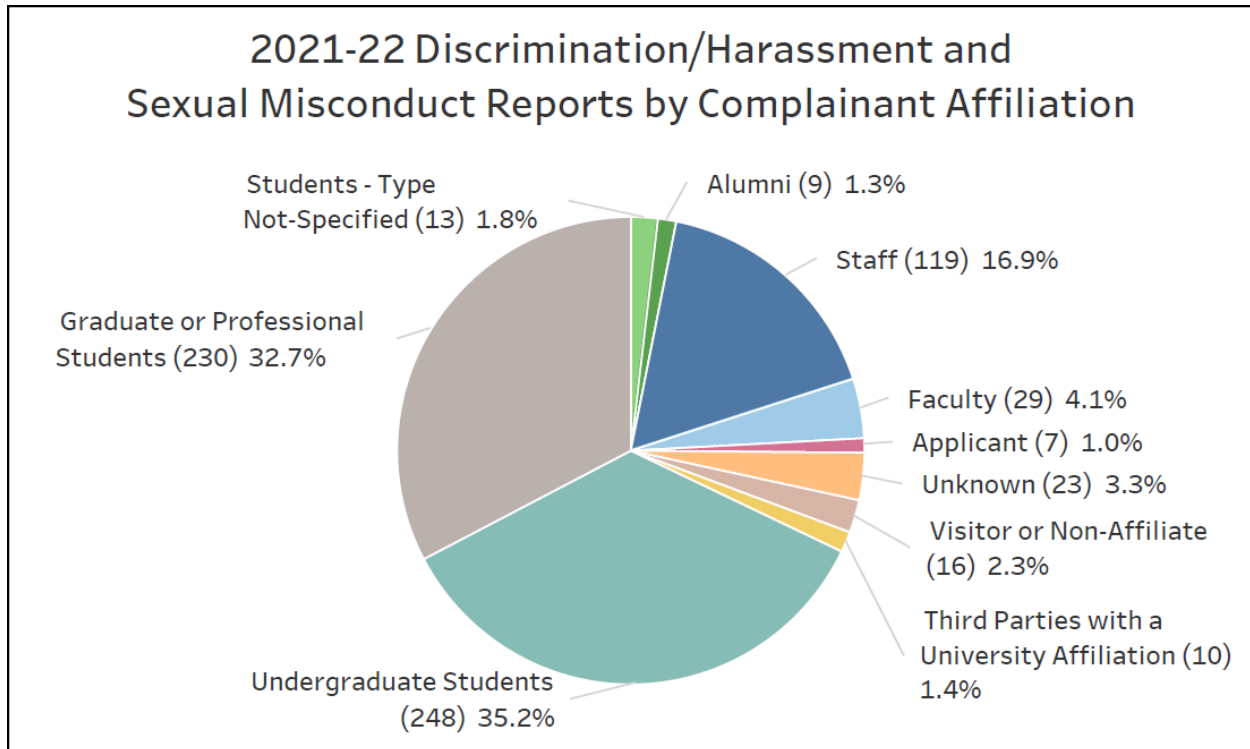


The following chart illustrates the basis for the 366 reports of discrimination and harassment. Note that each report could articulate one or more bases. As a result of some reports being counted on multiple bases, a total of 575 categorizations are represented below.



B. Distribution of Reports by Complainant Affiliation

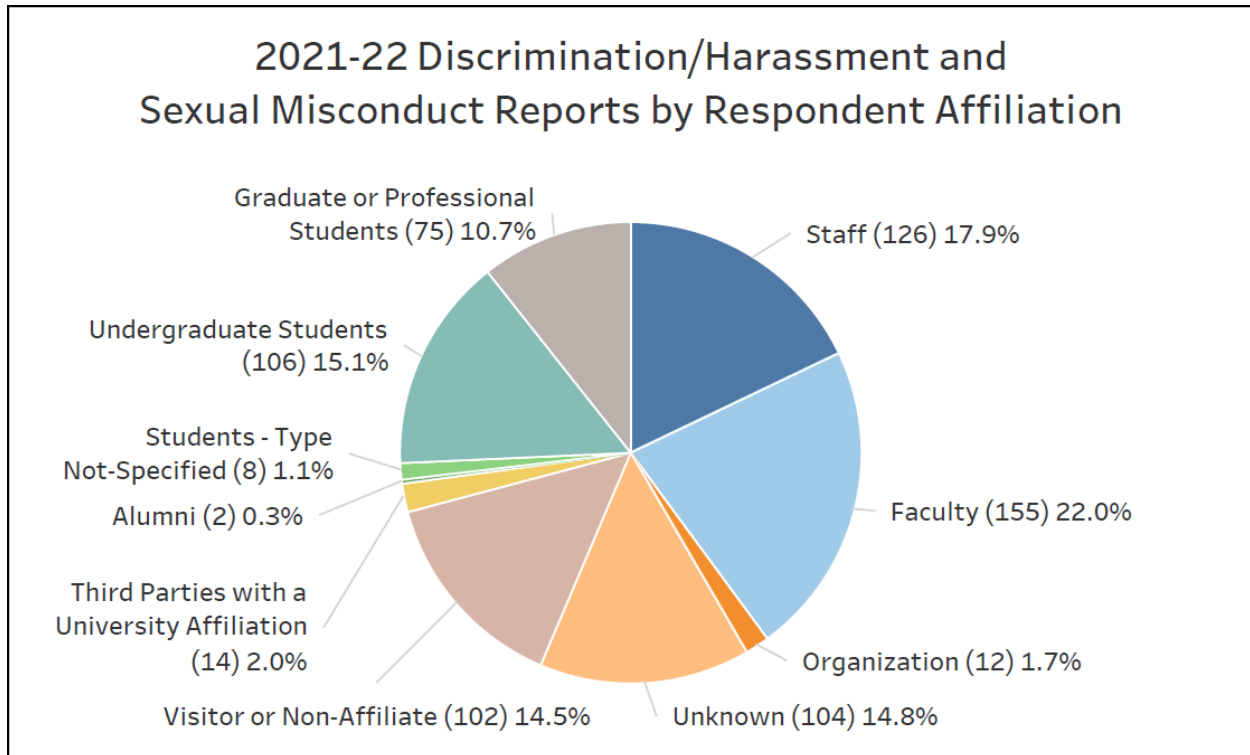
The following chart illustrates the complainant affiliation for each of the reports received by the Office of Equity during the 2021-2022 academic year. The complainant is the person who is alleged to have been impacted by the reported conduct. Of the 704 reports, 39 complainants (5.5%) either held no affiliation with Northwestern or remained unidentified.³



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

C. Distribution of Reports by Respondent Affiliation

The following chart illustrates the respondent affiliation for each of the reports received by the Office of Equity during the 2021-2022 academic year. The respondent is the person who is alleged to have engaged in discrimination, harassment, or sexual misconduct. Of the 704 reports received, 206 (29.3%) of the reports were against people not affiliated with Northwestern or people whose identity was unknown. For example, this includes reports about behavior by unaffiliated dating/domestic partners as well as incidents occurring off campus by non-Northwestern community members.⁴

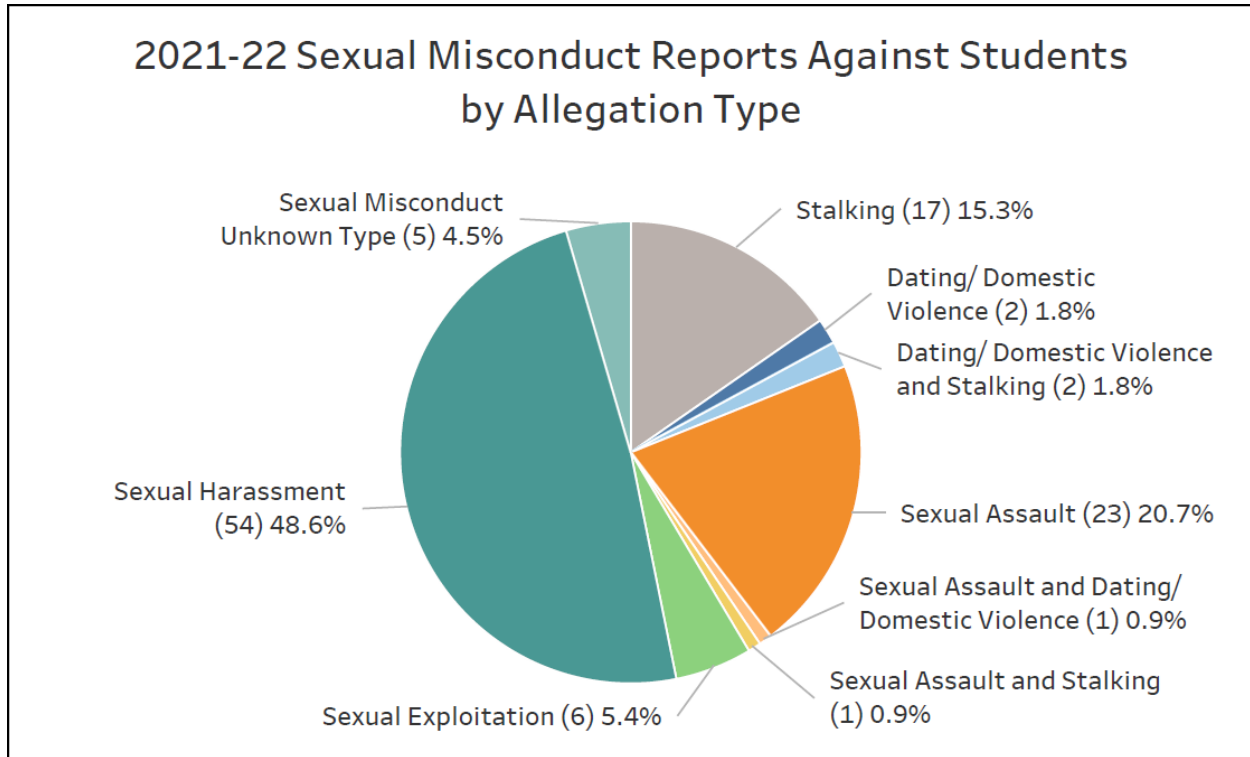


⁴ When Northwestern receives reports alleging misconduct by unidentified persons, or persons not affiliated with the University (and not otherwise connected to a University program or activity), support and resources are offered to the impacted individual(s) and other measures that may be needed to secure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

D. Reports Against Students

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

Between September 1, 2021, and August 31, 2022, the Office of Equity received 111 reports alleging that Northwestern students engaged in sexual misconduct.

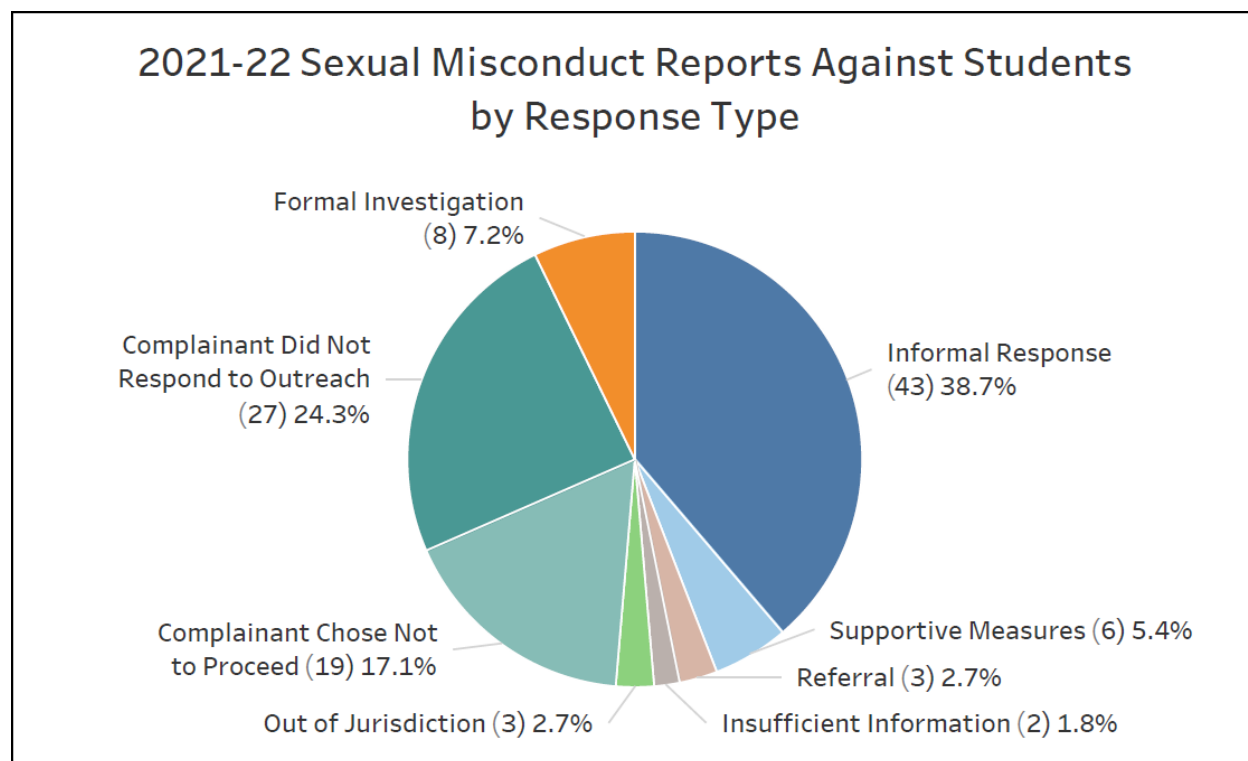


2. How Complainants Elected to Proceed

When a report is received from any source, including directly from impacted individuals and indirectly through others, the Office of Equity reaches out to the individual(s) who may have experienced misconduct to make them aware of the options and resources available to them. In cases where an individual reporting misconduct requests anonymity or does not wish to proceed with an investigation, the Office of Equity will attempt to honor that request but, in some cases, the Office of Equity may determine that it needs to proceed with an investigation. In such cases, the Office of Equity will not compel an individual to participate. Individuals impacted by sexual misconduct may request supportive measures only from the Office of Equity even if they do not choose to participate in the University's Complaint Resolution Process (6 individuals in 2021-22).

The following chart illustrates how the 111 reports of sexual misconduct against students were handled. In cases where a complainant wished to proceed with adjudication of a complaint against a student and there was reasonable information to suggest a policy violation may have occurred, the case was handled through **formal resolution**, which involved investigation and, in some cases, a sanctioning panel. In some cases where formal resolution was not desired by the complainant or when there was not enough information to proceed with formal resolution, **informal action** was used with the intent to reduce the recurrence of sexual misconduct and remediate its impact. Informal action does not result in findings related to responsibility, or in sanctions. For example,

informal action may have included no-contact directives or educational or advisory meetings with respondents.



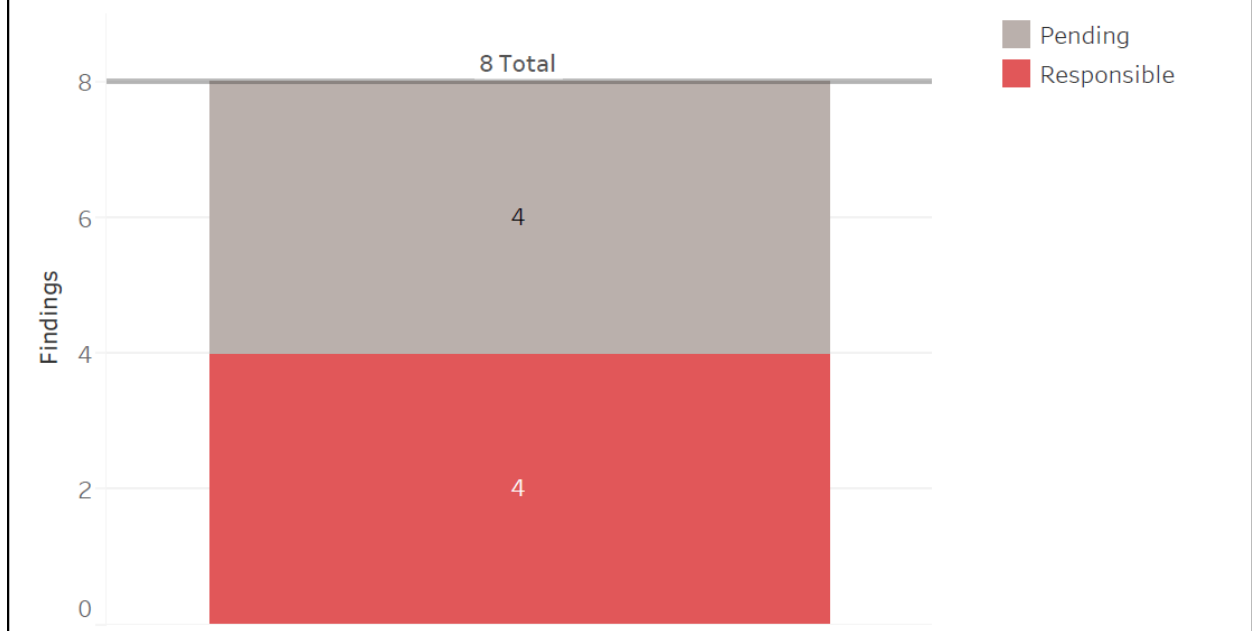
3. Outcomes in Adjudicated Student Cases

In student matters falling under the Policy on Institutional Equity, cases are investigated, and responsibility is determined by the Office of Equity. Cases are then referred to the Office of Community Standards for sanctioning. Cases involving lower-level violations where separation would not result are handled administratively by an OCS staff member. Cases that had the potential to result in separation from the University, including suspension or expulsion, outcomes were determined by a sanctioning panel facilitated by the Office of Community Standards. In student matters falling under the Interim Policy on TIX, the cases are investigated by the Office of Equity and then referred to a Decision Maker. The Decision Maker makes responsibility decisions following a live hearing, and in cases where the Decision Maker determines there is responsibility, consults with a sanctioning panel to determine sanctions.

The following chart illustrates adjudication outcomes in the 8 student cases that proceeded through the formal resolution process during the 2021-2022 academic year.⁵

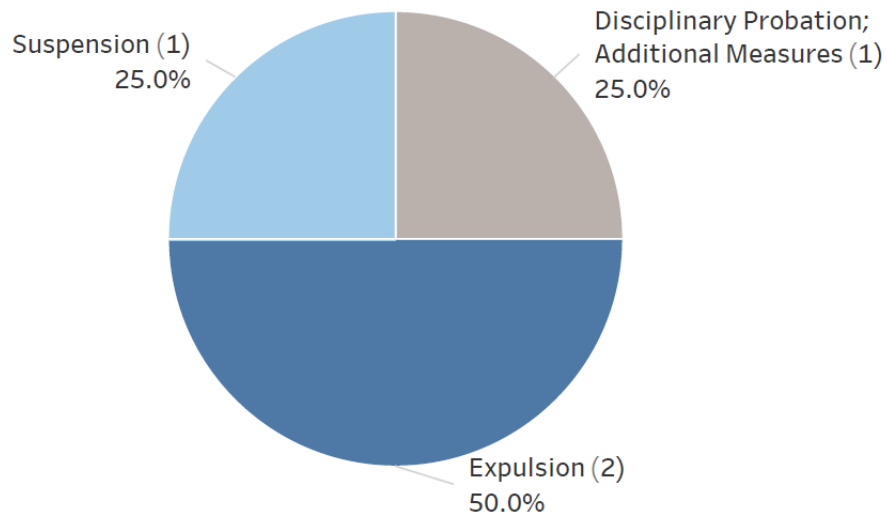
⁵ In cases where a student was alleged to have violated multiple categories of the Policy on Sexual Misconduct, or to have acted against multiple complainants, the outcome is listed as “Not Responsible” only when the student was found Not Responsible for *all* sexual misconduct allegations against *all*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

2021-22 Findings in Sexual Misconduct Reports Against Students That Proceeded Through Formal Investigation



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

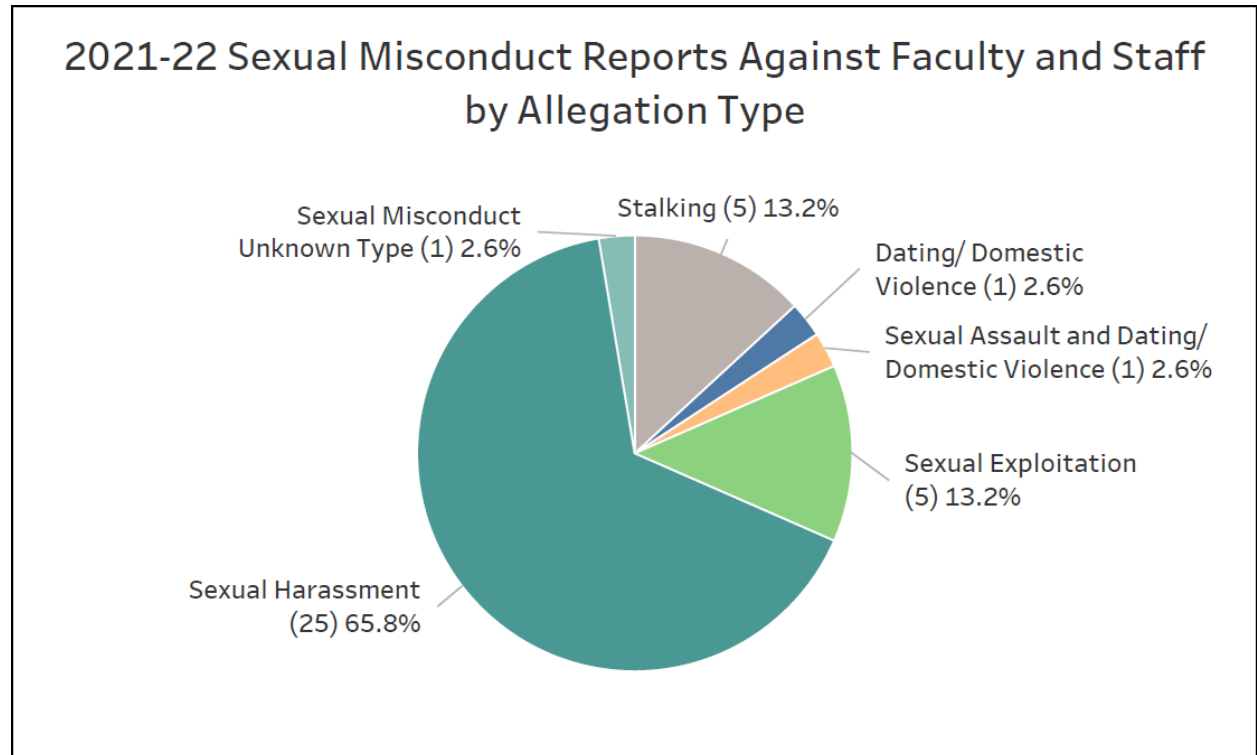
2021-22 Outcomes in Sexual Misconduct Reports Against Students with Responsible Findings



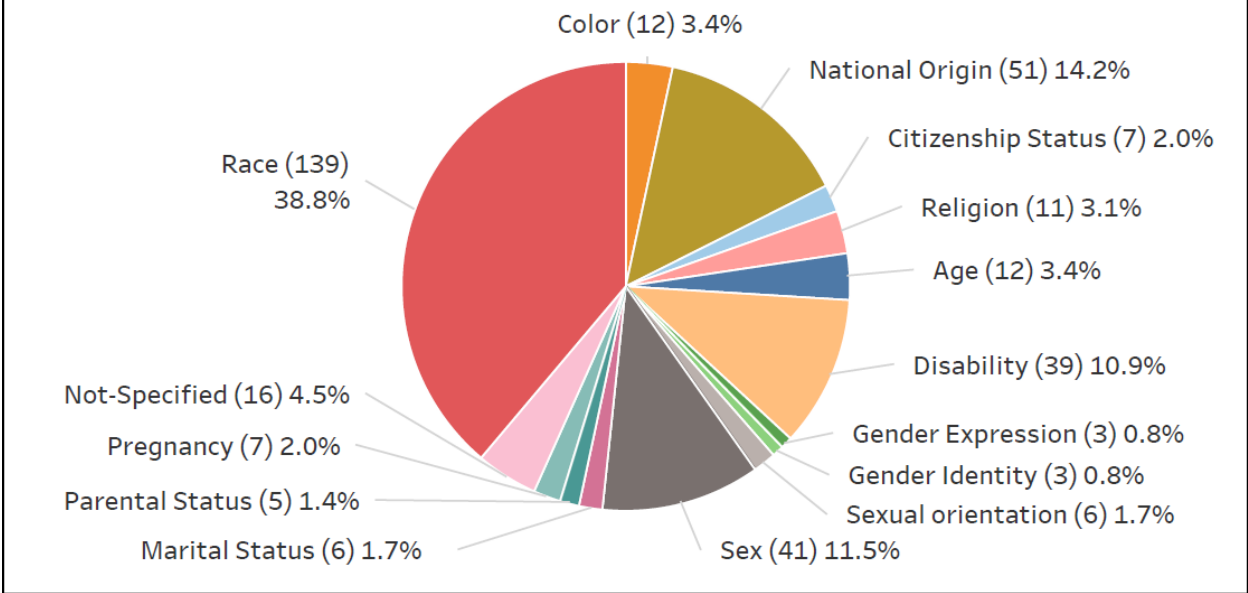
E. Reports Against Faculty and Staff

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

During the 2021-2022 academic year, the Office of Equity received 281 reports involving faculty or staff respondents. Thirty eight (38) of these reports included allegations of sexual misconduct and 251 reports included allegations of discrimination and harassment (8 reports included allegations of both sexual misconduct and discrimination and harassment and are thereby reflected in both charts). The following charts illustrate the types of allegations that were reported. Please note that discrimination and harassment reports could articulate more than one basis.



2021-22 Discrimination/Harassment Reports Against Faculty and Staff by Basis

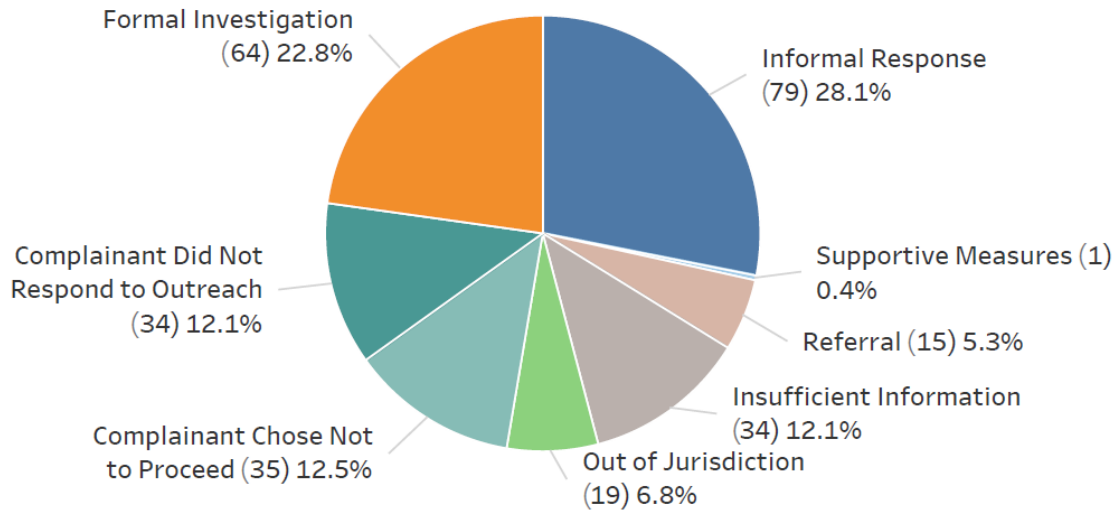


2. How Complainants Elected to Proceed

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

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

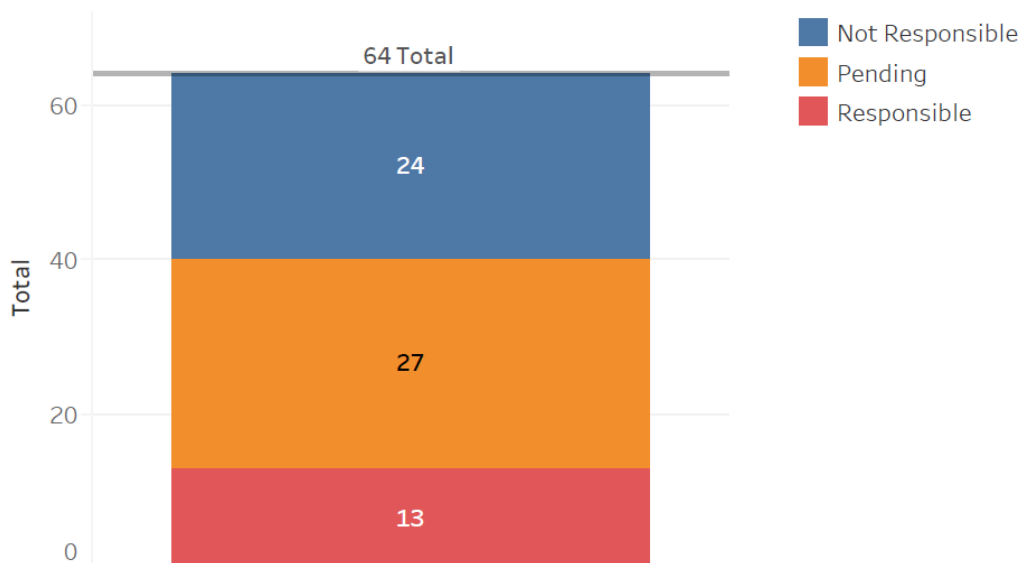
2021-22 Discrimination/Harassment and Sexual Misconduct Reports Against Faculty and Staff by Response Type



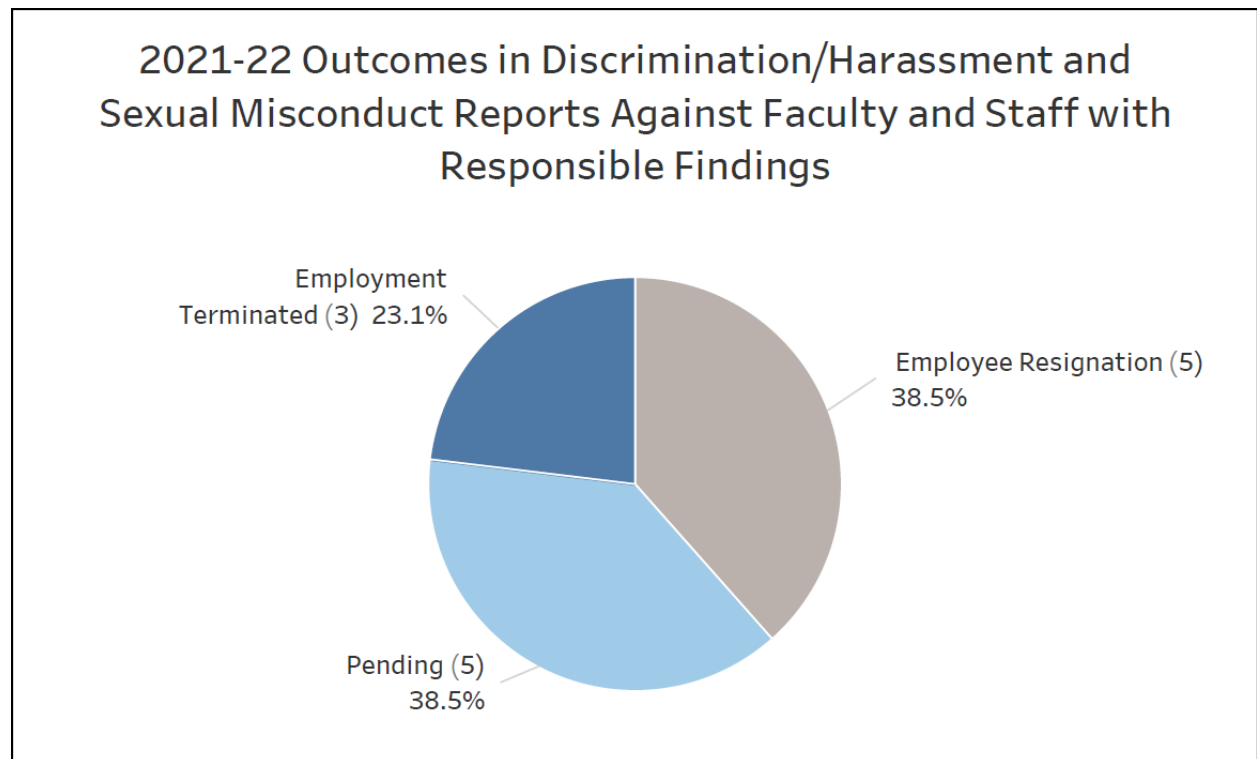
3. Outcomes in Adjudicated Faculty/Staff Cases

The following charts illustrate the findings and outcomes of the 64 reports against faculty and staff that were formally resolved through investigation during the 2021-2022 academic year.

2021-22 Findings in Discrimination/Harassment and Sexual Misconduct Reports Against Faculty and Staff That Proceeded Through Formal Investigation



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



III. Reasonable accommodations for employees with disabilities and pregnant employees

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

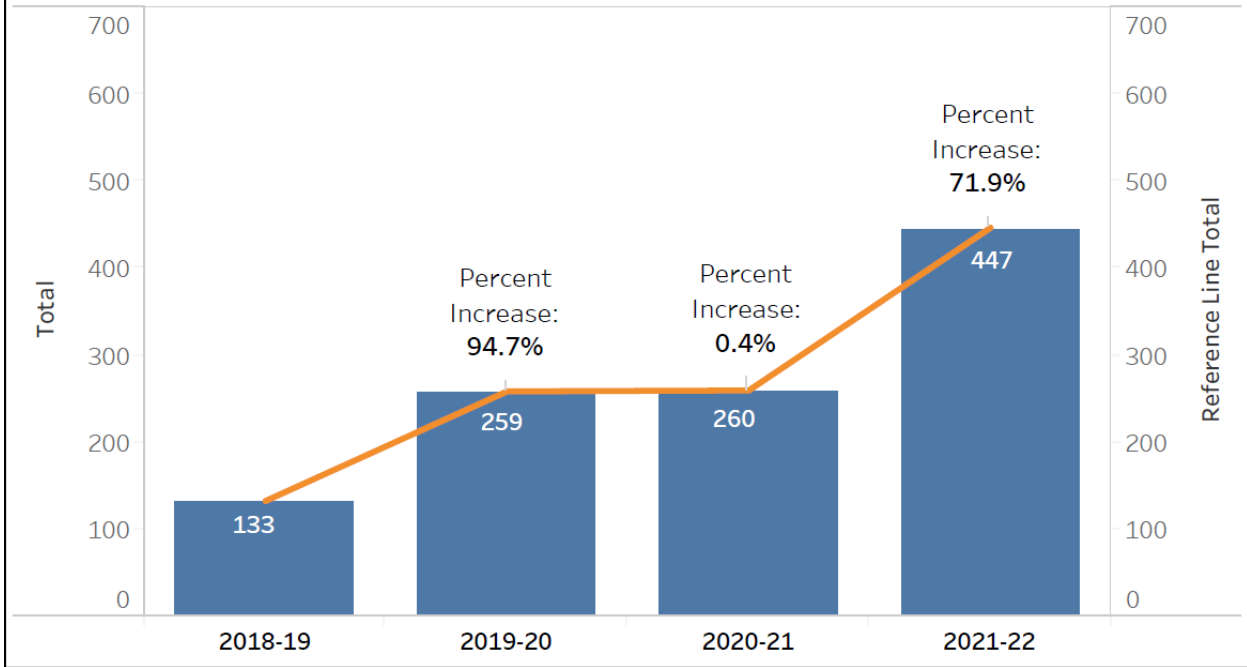
During the 2021-22 academic year, as part of an ongoing effort to ensure a physically accessible campus, the Office of Equity joined the Campus Accommodation Advisory Council, which advises University leadership on their response to systemic campus accessibility concerns. Additionally, the Office of Equity reviews and responds to physical accessibility concerns raised by individual members of the community.

The Office of Equity also took a number of steps to ensure accessibility in Northwestern's digital landscape. The Office of Equity responds to digital accessibility concerns raised by individual members of the community. The Office of Equity continued its work on the Digital Accessibility Steering Committee (DASC) to obtain, develop and promote a number of resources for the Northwestern community. Those resources include support for the Digital Liaison program, to increase in-house knowledge of and implementation of digital accessibility requirements; and enhancements to the [University's Accessibility website](#), which provides a central location where community members and visitors can find resources and report accessibility issues. The Accessibility website is regularly updated with new resources and served as a valuable source of information for staff and faculty shifting to remote operations.

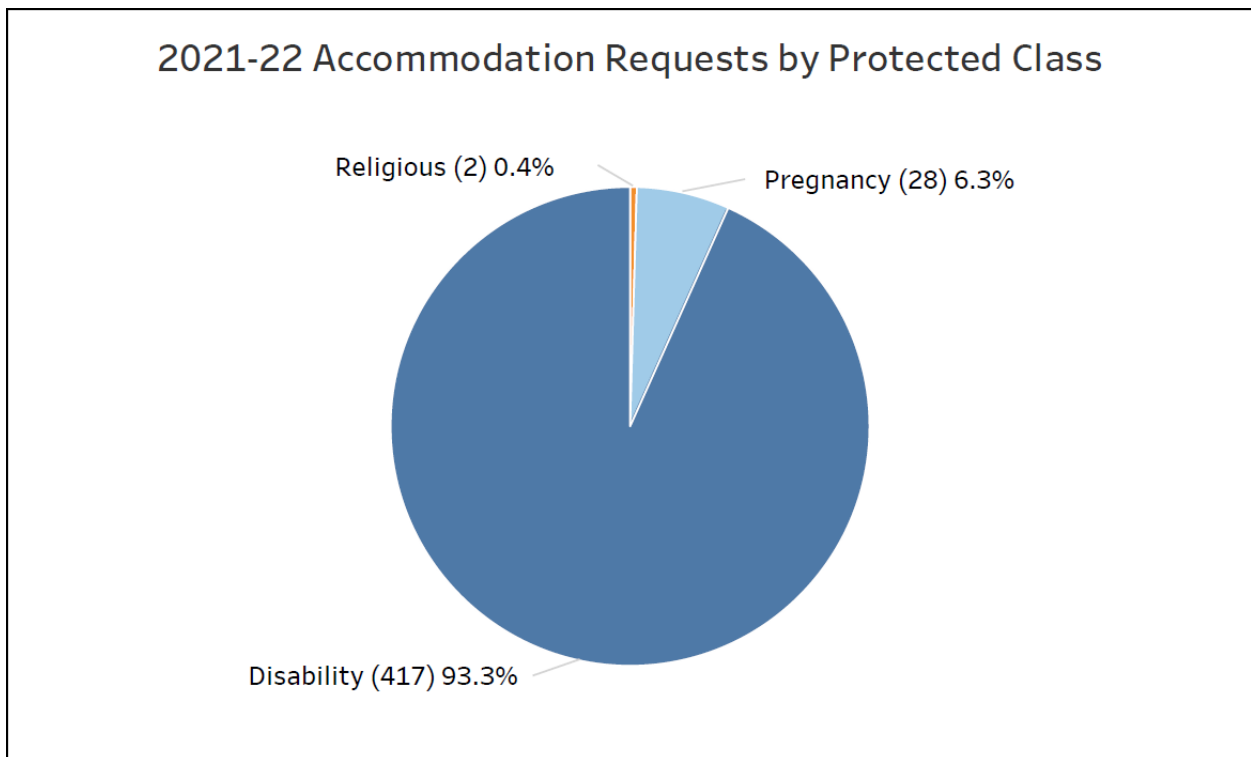
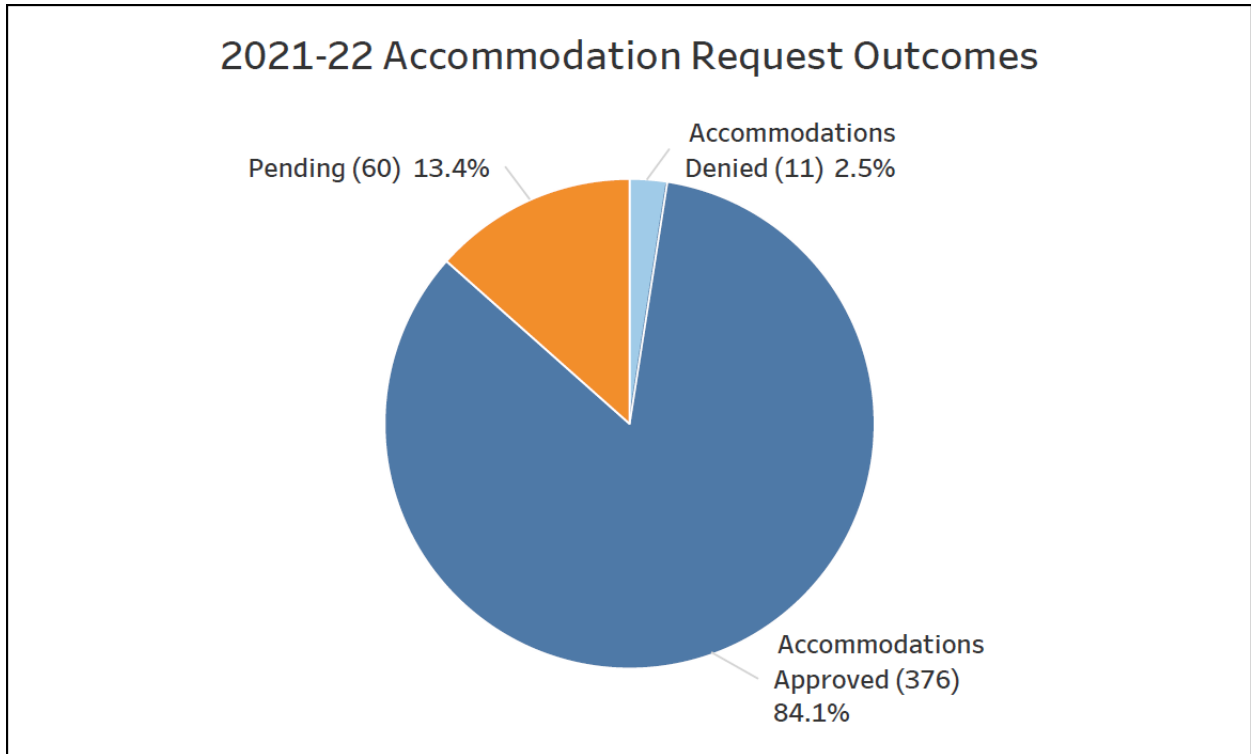
A. Overview of Accommodation Requests

During the 2021-2022 fiscal year, the Office of Equity received 447 requests for accommodations of which 417 requests were related to disability. This number includes new accommodation requests, alternative accommodations, extension requests, and adjustments to existing accommodations. When the Office of Equity receives a request for a workplace accommodation, the Office engages in an interactive process with the requestor of the accommodation. That interactive process involves consultation with the requestor, the requestor's health care providers, and relevant University departments (such as Parking, Facilities, etc.). The Office of Equity seeks to implement the requestor's preferred accommodations when possible. In some cases when the preferred accommodation may not be an option, the Office of Equity engages with all parties to identify effective alternative accommodations. Denial of accommodation requests is a rare occurrence because the interactive process succeeds in identifying reasonable accommodations in most cases. The following charts illustrate the outcomes of these requests.

Year over Year Change in Total Accommodation Requests



The following charts illustrate the outcomes of these requests.



Accommodations vary based on the impact of the condition on the individual who is seeking an accommodation. The accommodations approved in the 2021-2022 fiscal year included (among many others):

- Ergonomic equipment for individuals with chronic musculoskeletal conditions and sciatica;
- Provision of Communication Access Realtime Translation (CART) captioning services, ASL interpretation, and clear face masks for deaf and hard-of-hearing employees;
- Microphones, keyboards, and text-to-speech software to facilitate remote teaching and work;
- Temporary reserved parking spots for those impacted by broken bones and arthritis;
- Remote work; and
- Flexible scheduling to attend medical appointments and treatment programs.

IV. Affirmative Action Planning

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

On an annual basis, the Office of Equity works with the HR Talent Acquisition office, the HR Support, Process & Analytics office, and the Faculty Operations office to implement and refine processes for the flow of data and information stemming from diversity data requests from across the University. Focus continues to be placed on establishing processes for working with recruiters and search committees for the analysis of data as it relates to AAP requirements for focusing outreach and recruitment efforts. These efforts are essential to the AAP component designed to increase the diversity of applicant pools in areas of underrepresentation at the University.

This past year a major effort was undertaken to further assist the HR Talent Acquisition team in reviewing its progress in outreach and recruitment efforts through a 7-year lookback report of applicant pool data. The data was broken out by job groupings and presented alongside current job group population percentages as well as market population estimates for comparative values to determine where progress has been made in drawing in diverse pools of applicants and where further efforts can be focused based on market comparisons. The report also included data on hiring numbers by job groupings mapped to time period throughout the year. These data help HR Talent Acquisition identify high volume trends and times when hiring activity may ramp up, which helps teams proactively prepare by pre-emptively initiating conversations around recruiting strategy with hiring managers.

Conversations were also initiated around HR Talent Acquisition's ongoing efforts to implement data sets for more accurately tracking applicant sourcing efforts as possible data points to better analyze the effectiveness of outreach and recruiting efforts with specific recruiting organizations and marketing outlets. This work is ongoing and an essential component for future efforts to analyze the effectiveness of efforts to draw in more diversity into applicant pools.

Training Initiatives

During academic year 2021-2022, the Office of Equity provided live training, either in-person or virtual through 66 events. Many trainings were provided in partnership with other units and student groups, including the Center for Awareness, Response, and Education (CARE), Associated Student Government (ASG), Well-being, Engagement, Learning and Leadership (WELL), the Women's Center, and the Office of the Provost. Fifty-four (54) of these events were held online, one was organized as a hybrid event. The remaining events were held in person at various campus locations.

Additionally, the Office of Equity provided online, asynchronous sexual misconduct prevention training to 8,618 members of the faculty and staff community:

- Faculty: 2,195
- Staff: 5,346
- Others: 1,077