



Northwestern  
University

**Approving University Officials:** Provost; Executive Vice President  
**Responsible Office:** Provost; Human Resources; Student Affairs;  
Office of Equity  
**Effective date:** August 2017  
**Next review date:** January 2018

## POLICY ON SEXUAL MISCONDUCT

[Policy Statement](#)

[Jurisdiction](#)

[Purpose](#)

[Audience](#)

[Definitions](#)

[Policy Implementation](#)

- I. Policy
  - A. [Consent](#)
  - B. [Prohibited Conduct](#)
  - C. [Reporting Obligation](#)
  - D. [Retaliation](#)
  - E. [Amnesty for Sexual Misconduct Complainants and Witnesses](#)
  - F. [Free Expression and Academic Freedom](#)
  - G. [Title IX and VAWA Statement](#)
- II. Procedures
  - A. [Seeking Medical Assistance in the United States](#)
  - B. [Seeking Medical Assistance at the Doha, Qatar \(NU-Q\) Campus](#)
  - C. [Preserving Evidence](#)
  - D. [Confidential Support, Advocacy, and Counseling](#)
  - E. [Reporting Sexual Misconduct](#)
  - F. [Interim Measures and Accommodations](#)
  - G. [Investigation and Resolution of Alleged Policy Violations](#)
  - H. [Educational Training, Awareness, and Prevention Programs](#)

[Consequences of Violating this Policy](#)

- I. [Sexual Misconduct Violations](#)
- II. [Violations of Interim Measures Directives](#)
- III. [Retaliation](#)

[Related Information](#)

[Contacts](#)

[History](#)

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

[Appendix B:](#) Sexual Misconduct Complaint Resolution Process

[Appendix C:](#) Resources Not Subject to Mandatory Reporting

## **Policy Statement**

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

## **Jurisdiction**

Northwestern may investigate any alleged violations of this policy that occur in the context of a University program or activity or that otherwise affect the University’s working or learning environments, regardless of whether the alleged conduct occurred on or off campus. In situations where the alleged sexual misconduct occurred outside of the context of a University program or activity or where the respondent is not a member of the University community (including when the respondent has graduated or left the University), the University typically will not conduct an investigation, but may address the situation and provide appropriate resources to impacted individuals and, where appropriate, the broader University community.

## **Purpose**

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

## **Audience**

All members of the Northwestern community, including students, faculty, staff, vendors, contractors, visitors, guests, volunteers, interns, and third parties.

## **Definitions**

The terms and definitions used throughout are important components of this policy. The definitions are intended to give meaning to these terms in the context of the Northwestern community, and can be accessed in the policy using the links below:

[Consent](#)

[Dating/Domestic Violence](#)

[Retaliation](#)—see also the [University Policy on Non-Retaliation](#)

[Sexual Assault](#)

[Sexual Exploitation](#)

[Sexual Harassment](#)

[Stalking](#)

Criminal and other applicable state laws may use different definitions of these terms.<sup>1</sup>

## Policy Implementation

### I. Policy

#### A. Consent

Consent represents the cornerstone of respectful and healthy intimate relationships. Northwestern strongly encourages its community members to communicate – openly, honestly, and clearly – about their actions, wishes, and intentions when it comes to sexual behavior, and to do so before engaging in intimate conduct. It is always the requirement of the individual initiating sexual contact (or undertaking a new type of sexual activity) to ensure that consent is present before acting and is present during sexual activity.

**When determining whether consent was present, the University will consider whether a sober, reasonable person in the same position knew or should have known whether the other party could or could not consent to the sexual activity.**

*I. 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:* Consent must demonstrate that all individuals understand, are aware of, and agree to the “who” (same partners), “what” (same acts), “where” (same location), “when” (same time), and “how” (the same way and under the same conditions) of the sexual activity. Consent to engage in sexual activity with one person does not constitute consent to engage in sexual activity with another person.

*-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).

---

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

*-Present and ongoing:* Consent must exist at the time of the sexual activity. Consent to previous sexual activity does not imply consent to later sexual acts; similarly, consent to one type of sexual activity does not imply consent to other sexual acts. Consent may also be withdrawn at any time, provided the person withdrawing consent makes that known in clearly understandable words or actions.

2. 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.

Signs of incapacitation include when an individual demonstrates that they are unaware of where they are, how they got there, or why or how they became engaged in a sexual interaction. Some indicators of a lack of capacity to give consent due to consumption of drugs or alcohol may include, but are not limited to:

- Lack of full control over physical movements (for example, difficulty walking or standing without stumbling or assistance);
- Lack of awareness of circumstances or surroundings (for example, lack of awareness of where one is, how one got there, who one is with, or how or why one became engaged in sexual interaction);
- Inability to effectively communicate for any reason (for example, slurring speech, difficulty finding words).

A person may appear to be giving consent but may not have the capacity to do so, in which case the apparent consent is not effective. When determining whether consent was present, 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. **If there is any doubt as to another person's capacity to give consent, community members should assume that the other person does not have the capacity to give consent.** Being intoxicated or impaired by drugs or alcohol does not excuse one from the responsibility to obtain consent. Being intoxicated or impaired by drugs or alcohol is never an excuse to commit sexual misconduct.

## **B. Prohibited Conduct**

Northwestern prohibits all forms of sexual misconduct. Such conduct violates the community values and principles of the institution and disrupts the living, learning, and working environment for students, faculty, staff, and other community members. Therefore, the University prohibits the actions listed below. An attempt to commit an act identified in this policy, as well as assisting or willfully encouraging any such act, is also considered a violation of this policy. An act may violate one or more parts of this policy. Community members may also be held responsible for the misconduct of their visitors and guests.

## 1. Sexual Assault

**a. Sexual penetration without consent** (e.g., rape): 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.

**b. Sexual contact without consent** (e.g., fondling): Knowingly touching or fondling a person's genitals, breasts, thighs, groin, or buttocks, or knowingly touching a person with one's own genitals, breasts, or buttocks, when consent is not present.

This includes contact done directly or indirectly through clothing, bodily fluids, or with an object. It also includes causing or inducing a person, when consent is not present, to similarly touch or fondle oneself or someone else.

**c. Incest:** Sexual intercourse between persons who are related to each other within the degrees wherein marriage is prohibited by the laws of the state<sup>2</sup> in which the incident occurred.

**d. Statutory rape:** Sexual intercourse with a person who is under the statutory age of consent under the laws of the state<sup>3</sup> in which the incident occurred.

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

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>4</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 with the intent to engage in sexual conduct, regardless of whether prohibited sexual conduct actually occurs.

3. 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.

---

<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.

<sup>3</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.

<sup>4</sup> Breast-feeding a child is not indecent.

Conduct that can amount to stalking may include two or more actions directed at another person, whether done directly, indirectly, through others, via devices, or via any other methods or means (specifically including electronic means such as social media), including but not limited to:

- Following a person;
- Being or remaining in close proximity to a person;
- Entering or remaining on or near a person's property, residence, or place of employment;
- Monitoring, observing, or conducting surveillance of a person;
- Threatening (directly or indirectly) a person;
- Communicating to or about a person;
- Giving gifts or objects to, or leaving items for, a person;
- Interfering with or damaging a person's property (including pets); or
- Engaging in other unwelcome contact.

4. Dating/Domestic Violence: Physical abuse, psychological/emotional abuse, or sexual abuse between persons in an intimate relationship where the conduct is so severe, pervasive, or persistent as to significantly interfere with an individual's ability to learn and/or work or cause substantial emotional distress, when judged both objectively (meaning that a reasonable person would find the behavior to be abusive) and subjectively (meaning the impacted individual felt the behavior was abusive).

These actions may include, but are not limited to:

- *Physical abuse:* hitting, slapping, shoving, grabbing, pinching, biting, or hair pulling;
- *Psychological/emotional abuse:* a pattern of behavior undermining an individual's sense of self-worth or self-esteem, constant criticism, diminishing one's abilities, name-calling, or damaging one's relationship with one's children;
- *Sexual abuse:* attacks on sexual parts of the body, treating one in a sexually demeaning manner, coercing, or attempting to coerce any sexual contact or behavior without consent.

Individuals encompassed in the definition of *Dating Violence* include, but are not limited to:

- Persons who have or have had a dating relationship;
- Persons who have or have had a social relationship of a romantic or intimate nature.

Individuals encompassed in the definition of *Domestic Violence* include, but are not limited to:

- Current and former spouses;
- Current and former domestic partners;
- Intimate partners or dating partners who share or formerly shared a common dwelling;
- Persons who otherwise have a child in common or share a relationship through a child.

5. Sexual Harassment: Sexual harassment is any unwelcome conduct of a sexual nature where:

- a. 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

**b.** Such conduct creates a hostile environment. A hostile environment exists when the conduct is sufficiently severe, persistent, or pervasive that it unreasonably interferes with, limits, or deprives an individual from participating in or benefitting from the University's education or employment programs and/or activities. The existence of a hostile environment is to be judged both objectively (meaning a reasonable person would find the environment hostile) and subjectively (meaning the impacted individual felt the environment was hostile).

Some examples of sexual harassment may include:

- Pressure for a dating, romantic, or intimate relationship;
- Unwelcome sexual advances;
- Unwelcome touching, kissing, hugging, or massaging;
- Pressure for or forced sexual activity;
- Unnecessary references to parts of the body;
- Remarks about a person's gender, nonconformity with gender stereotypes, or sexual orientation;
- Sexual innuendoes or humor;
- Obscene gestures;
- Sexual graffiti, pictures, or posters;
- Sexually explicit profanity;
- E-mail, texting ("sexting"), and Internet use that violates this policy.

All forms of sexual misconduct identified in this policy are also prohibited forms of sexual harassment.

### **C. Reporting Obligation**

1. Sexual misconduct: All University employees (including student employees), as well as non-employees with teaching or supervisory authority, are obligated to promptly report sexual misconduct of which they become aware in the scope of their work for the University to the Title IX Coordinator or Deputy Title IX Coordinator for Students, unless they are a resource listed below. The University encourages all individuals to report sexual misconduct.

2. Incidents involving minors: As stated in the University's [Policy on Reporting Suspected Child Abuse and Neglect](#), 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 Title IX Coordinator 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).

### **D. 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, that are aimed to dissuade a reasonable party or a witness from reporting sexual misconduct or

participating in an investigation or hearing. 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 alleged incident of retaliation under this policy to the Title IX Coordinator or Deputy Title IX Coordinator for Students, who shall investigate the matter and take appropriate actions to address such conduct.

#### **E. 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 drinking or using drugs at the time of the incident may be hesitant to make a report because of potential consequences for their own conduct. 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. Amnesty does not preclude or prevent action by police or other legal authorities. This Amnesty provision shall also apply to student groups making a report of sexual misconduct.

#### **F. 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 sexual misconduct or retaliation that involve an individual's statements or speech.

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

It is the policy of Northwestern to comply with Title IX of the Education Amendments of 1972, which prohibits discrimination (including sexual harassment and sexual violence) based on sex in the University's educational programs and activities. It is also Northwestern's policy to comply with the federal Violence Against Women Act amendments to the Jeanne Clery Disclosure of Campus Security Policy and Campus Crimes Statistics Act, and the accompanying regulations (collectively referred to as VAWA). 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 Coordinator to coordinate Northwestern's compliance with the Clery reporting related VAWA requirements. For more information about Title IX and VAWA, please go to [www.northwestern.edu/sexual-misconduct](http://www.northwestern.edu/sexual-misconduct). A person may also file a complaint with the Department of Education's Office for Civil Rights regarding an alleged violation of Title IX by visiting [www2.ed.gov/about/offices/list/ocr/complaintintro.html](http://www2.ed.gov/about/offices/list/ocr/complaintintro.html) or calling 1-800-421-3481.



## II. Procedures<sup>5</sup>

### A. Seeking Medical Assistance in the United States

Experiencing any form of sexual misconduct, especially acts of violence, is difficult and overwhelming. Survivors often experience a range of emotions, including fear, anxiety, and confusion, and may be unsure of what they want to, or should, do next. Regardless of whether the individual chooses to report the incident, the University strongly encourages survivors of any form of violence to seek medical attention as soon as possible, even if they feel no injury was sustained. Medical assistance providers can treat visible physical injuries and identify injuries that may not be visible, and, where appropriate, also 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 Procedures Section C), which are also strongly recommended to maintain all legal options.

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

##### **Northwestern University Health Service**

*Evidence collection kit cannot be provided; CARE staff can be contacted to provide support services, if desired. (See Procedures Section D 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/index.html>  
(for regular hours of operation and 24-hour emergency contact info)

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

*Evidence collection kit available 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 Rape Victim Advocates will be present to provide support services, if desired.*

Location: 251 E Huron Street, Chicago

---

<sup>5</sup> For additional information, see Northwestern’s [Resource Guide on Sexual Misconduct and Title IX](http://www.northwestern.edu/sexual-misconduct/docs/TitleIXResourceGuide.pdf) (<http://www.northwestern.edu/sexual-misconduct/docs/TitleIXResourceGuide.pdf>). Print copies are available by contacting the Office of Equity, at (847) 467-6165 or [TitleIXCoordinator@northwestern.edu](mailto:TitleIXCoordinator@northwestern.edu).

Phone: (312) 926-5188 (emergency room)  
Website: <https://www.nm.org/locations/northwestern-memorial-hospital>  
(for more information)

**Presence 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. Emergency contraception is provided in cases of sexual assault.*

Location: 355 Ridge Avenue, Evanston  
Phone: (847) 316-4000  
Website: <http://www.presencehealth.org/presence-saint-francis-hospital-evanston-emergency-care>

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 12<sup>th</sup> Avenue Institute Annex 1<sup>st</sup> Floor, Miami  
Phone: (305) 585-7273  
Website: <http://jacksonhealth.org/services-rape-treatment.asp#gref>

**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; student can get a free Uber to MedStar by calling phone number below.*

Location: 110 Irving Street NW, Washington, D.C.  
Phone: (800) 641-4028  
Website: <https://www.medstarwashington.org/#q={ }>

**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: (415) 437-3000  
Website: <http://zuckerbergsanfranciscogeneral.org/>

## **B. Seeking Medical Assistance at the Doha, Qatar (NU-Q) Campus**

*Please see Appendix A for a complete summary of information regarding reporting sexual misconduct and receiving support (including confidential support) and resources at the NU-Q campus.*

*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 Deputy Title IX Coordinator for more information.*

If the survivor chooses not to go to the emergency room, they 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.

The nearest hospital to the Northwestern University in Qatar campus are:

### **Al-Ahli Hospital (12km from Education City)**

Ahmed Bin Ali Street

Emergency 24 hours a day, 7 days a week

+974 4489 8901, +974 4489 8999, +974 4489 3349

### **Women's Hospital (10km from Education City)**

Al Rayyan Road opposite Lulu Centre

Emergency 24 hours a day, 7 days a week

+974 4439 3299/3295

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)

## **C. Preserving Evidence**

Many sexual misconduct offenses also are crimes in the state or locality in which the incident occurred. For that reason, survivors of sexual misconduct often have legal options that they can pursue. 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:

***General 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 Title IX Coordinator.

***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. Confidential Support, Advocacy, and Counseling**

The following resources are available for individuals to discuss incidents and issues related to sexual misconduct on a confidential basis. Confidential resources will not disclose information about incidents of sexual misconduct to anyone, including law enforcement or the University, except in very limited situations, such as when failure to disclose the information would result in imminent danger to the individual or to others or where federal or state law requires a report be made. Confidential resources can provide survivors with information about support services and their options. Because of the confidential nature of these resources, disclosing information to or seeking advice from a confidential counselor does not constitute a report or complaint to the University and will not result in a response or intervention by the University. A person consulting with a confidential resource may later decide to make a report to the University or law enforcement.

**On-Campus Confidential Resources**

<p><b>CARE: Center for Awareness, Response &amp; Education<sup>6</sup></b></p>	<p><b><u>Evanston Campus:</u></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></p>	<p>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.</p>
--	---	---

---

<sup>6</sup>CARE is designated as the University’s confidential advisor under the Illinois *Preventing Sexual Violence in Higher Education Act*.

<p><b>CAPS: Counseling and Psychological Services</b></p>	<p><b>Evanston Campus:</b> 633 Emerson Street, 2nd Floor (847) 491-2151 (24-hours)</p> <p><b>Chicago Campus:</b> 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></p>	<p>Provides counseling services to students, also provides a counselor on call 24 hours a day.</p>
<p><b>Religious &amp; Spiritual Life</b></p>	<p><b>Evanston Campus:</b> 1870 Sheridan Road (847) 491-7256 (847) 864-7865 (after hours) <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></p>	<p>Provides spiritual counseling and advice for all members of the University community.</p>
<p><b>Faculty Wellness Program</b></p>	<p>Director Richard A. Carroll, PhD (312) 695-2323 <a href="mailto:rcarroll@nm.org">rcarroll@nm.org</a> <a href="http://www.northwestern.edu/provost/faculty-resources/work-life/faculty-wellness.html">http://www.northwestern.edu/provost/faculty-resources/work-life/faculty-wellness.html</a></p>	<p>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.</p>

**Off-Campus Confidential Resources**

<p><b>Hotlines</b></p>	<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>Employee Assistance Program</b>	(855) 547-1851 (24 hours) <a href="http://www.northwestern.edu/hr/work-life/employee-assistance-program.html">http://www.northwestern.edu/hr/work-life/employee-assistance-program.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>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) 871-2273 (Monday to Friday, 9 a.m. to 5 p.m.) <a href="http://www.centeronhalsted.org/">http://www.centeronhalsted.org/</a>	Services include: counseling services; connecting individuals with professional help, law enforcement, agencies, services, and other providers.
<b>Rape Victim Advocates</b>	Main Office: 180 N. Michigan Ave, Suite 600, Chicago (312) 443-9603 <a href="http://www.rapevictimadvocates.org">www.rapevictimadvocates.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="http://www.ywca.org/evanston">www.ywca.org/evanston</a>	Services include: counseling and support for survivors of dating/domestic violence, legal advocacy, and residential services (emergency shelter)
<b>Evanston Victim Services Program</b>	Evanston Police Department 1454 Elmwood Avenue, Evanston <a href="https://www.cityofevanston.org/government/departments/police/victim-youth-services">https://www.cityofevanston.org/government/departments/police/victim-youth-services</a>	Services include: crisis intervention for survivors of sexual violence and/or dating/domestic violence, medical and legal/court advocacy
<b>Life Span Center for Legal Services and Advocacy</b>	70 E. Lake Street, Suite 700, 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 and 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, Skokie (847) 676-4447 x304 (for appointments or a confidential assessment). <a href="http://www.centerforcontextualchange.org">www.centerforcontextualchange.org</a>	Services for survivors of sexual and domestic/dating violence: individual and group counseling.  Services for perpetrators of sexual and domestic/dating violence: individual and group counseling
<b>Porchlight Counseling Services</b>	(773) 750-7077 confidential helpline and intake <a href="http://www.porchlightcounseling.org/index2.php">http://www.porchlightcounseling.org/index2.php</a>	Services include: free counseling for survivors of sexual and/or domestic/dating violence
<b>KAN-WIN</b>	2434 E. Dempster St. Suite 111, Des Plaines (773) 583-1392 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.

## **E. Reporting Sexual Misconduct**

The University strongly encourages reporting of sexual misconduct. Members of the University community who believe they have experienced sexual misconduct have the right to choose whether or not to report the incident to the University or law enforcement, and, in most circumstances, have the right to choose whether or not to pursue a sexual misconduct complaint with the University once the University receives a report. The information below is for individuals who wish to report incidents of sexual misconduct.

### ***1. Reporting Incidents to Law Enforcement***

Northwestern University encourages individuals to report incidents of sexual misconduct to University Police or local law enforcement officials. Timely reporting to the police is an important factor in successful investigation and prosecution of crimes, including sexual violence, and may lead to the arrest of an offender or aid in the investigation of other incidents.

An individual who has experienced sexual misconduct has the right to choose whether to file a police report. Filing a police report can result in the investigation of whether sexual violence or related crimes occurred and the prosecution of those crimes against a perpetrator. It is important to know that reporting the incident to police or University Police does not mean an individual is obligated to testify in court.

The Northwestern University Police Department has officers who are specially trained to work with individuals reporting sexual violence. Further, University Police has a written [guarantee](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 primary concern for survivors and



emphasizes sensitivity and privacy. University Police can also assist in reviewing options with survivors and identifying and facilitating support resources related to:

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

Reports of sexual misconduct made to University Police will be automatically reported to the Title IX Coordinator or Deputy Title IX Coordinator for Students, regardless of whether the individual who experienced the sexual misconduct chooses to pursue criminal charges.

#### **Northwestern University Police Department**

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

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

#### **Evanston Police Department**

Evanston Campus: 1454 Elmwood Avenue, Evanston  
Phone: 911 or (847) 866-5000 (24 hours)  
Website: [www.cityofevanston.org/police/](http://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/community/districts/18th-district-near-north/>

## ***2. Reporting Incidents to the University***

An individual who has experienced sexual misconduct has the right to choose whether to report the incident to the Office of Equity. As stated in Policy Section C, all University employees (including student employees) are obligated to promptly report incidents of sexual misconduct of which they become aware during the scope of their work for the University, unless they are a resource listed in Appendix C. Further, students, bystanders, and third parties who have observed or have been made aware of sexual misconduct may report the incident to the Office of Equity. Northwestern provides the option for making reports in person, by email, by regular mail, by phone, or electronically.

While anonymous reports will be reviewed by the Title IX Coordinator, the University's ability to address alleged misconduct reported by anonymous sources is significantly limited.

To speak to someone confidentially without making a report, please see the Confidential Resources listed in Procedures Section D.

The staff identified below are specially trained to work with individuals who report sexual misconduct and have knowledge about on- and off-campus resources, services, and options—including the availability of interim measures and accommodations, as discussed in Procedures

Section F. The University has generally designated the Title IX Coordinator or designee to oversee complaints of sexual misconduct involving staff, faculty, and third parties, and the Deputy Title IX Coordinator for Students to oversee complaints of sexual misconduct involving students.

#### **Title IX Coordinator**

Contact: Colleen Johnston, Title IX Coordinator;  
Office of Equity  
Location: 1800 Sherman, Suite 4-500, Evanston  
Phone: (847) 491-3881  
Email: [colleen.johnston@northwestern.edu](mailto:colleen.johnston@northwestern.edu) or [TitleIXCoordinator@northwestern.edu](mailto:TitleIXCoordinator@northwestern.edu)  
Website: [www.northwestern.edu/sexual-misconduct](http://www.northwestern.edu/sexual-misconduct)

#### **Deputy Title IX Coordinator for Students**

Contact: Amanda DaSilva, Deputy Title IX Coordinator for Students;  
Office of Equity  
Location: 1800 Sherman, Suite 4-500, Evanston  
Phone: (847) 467-6571  
Email: [amanda.dasilva@northwestern.edu](mailto:amanda.dasilva@northwestern.edu) or [DeputyTitleIXCoordinator@northwestern.edu](mailto:DeputyTitleIXCoordinator@northwestern.edu)  
Website: [www.northwestern.edu/sexual-misconduct](http://www.northwestern.edu/sexual-misconduct)

#### **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: [www.Bit.ly/NUReportSexualMisconduct](http://www.Bit.ly/NUReportSexualMisconduct).

Individuals may also file a report by email to: [TitleIXReport@northwestern.edu](mailto:TitleIXReport@northwestern.edu).

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: [www.northwestern.edu/ethics/](http://www.northwestern.edu/ethics/)

#### **F. Interim Measures and Accommodations**

Interim measures and accommodations are reasonable measures the University can put in place for an individual who reports having experienced sexual misconduct. Interim measures and accommodations can provide immediate support and help protect the individual's safety and ability to access their education and employment, at no cost to that individual. These measures can be temporary in duration pending the results of an investigation, but can become permanent. Interim measures and accommodations include, but are not limited to:

- A no-contact directive issued by the Title IX Coordinator, Deputy Title IX Coordinator for Students, or their designee;
- Housing or work space relocation;
- Changes to dining;
- Adjustment of course schedules or other changes to an individual's academic situation;

- Changes to work schedules or other changes to an individual’s employment situation;
- Time off from class or work, or a leave of absence;
- Transportation arrangements;
- Safety planning;
- As feasible, honoring an order of protection entered by a court if the University has been notified of the order and its terms.

**Interim measures and accommodations are available regardless of whether an individual chooses to report an incident to University Police or local law enforcement or pursue a complaint with the University.** The Title IX Coordinator, Deputy Title IX Coordinator for Students, or their designee will determine whether interim measures and accommodations are reasonable and should be implemented, and, if so, will work to ensure that these measures and accommodations are implemented as soon as possible.

The University will keep confidential any interim measures and accommodations provided, to the extent that maintaining such confidentiality would not impair the ability of the institution to provide these measures.

To seek an interim measure or accommodation:

**Students** should contact:

Contact: Amanda DaSilva, Deputy Title IX Coordinator for Students;  
Office of Equity  
Location: 1800 Sherman, Suite 4-500, Evanston  
Phone: (847) 467-6571  
Email: [amanda.dasilva@northwestern.edu](mailto:amanda.dasilva@northwestern.edu) or [DeputyTitleIXCoordinator@northwestern.edu](mailto:DeputyTitleIXCoordinator@northwestern.edu)  
Website: [www.northwestern.edu/sexual-misconduct](http://www.northwestern.edu/sexual-misconduct)

**Staff and faculty** should contact:

Contact: Sarah Brown, Deputy Title IX Coordinator  
Office of Equity  
Location: 1800 Sherman, Suite 4-500, Evanston  
Phone: (847) 467-4335  
Email: [sarah.brown@northwestern.edu](mailto:sarah.brown@northwestern.edu)  
Website: [www.northwestern.edu/sexual-misconduct](http://www.northwestern.edu/sexual-misconduct)

## **G. Investigation and Resolution of Alleged Policy Violations**

Reporting an incident of sexual misconduct or retaliation to the University can result in the investigation of whether a violation of this policy occurred and can also result in disciplinary action against any student, staff or faculty member, or outside party, who is determined to have violated this policy (see Consequences of Violating this Policy below). The University has generally designated the Office of Equity to receive and oversee complaints of sexual misconduct and retaliation. University groups, including student groups, and departments are expected to report concerns to the Office of Equity and not to take action outside of the University’s complaint resolution process. Upon receiving a report of sexual assault, sexual exploitation, stalking, dating or domestic violence, or sexual harassment, the Office of Equity will provide the complainant with information about their rights and options.

The University's process for resolving reports of violations of this policy will be prompt, fair, and impartial. The complaint resolution process, which is described in Appendix B, is intended to afford a prompt response to reports of sexual misconduct, to maintain privacy and fairness consistent with applicable legal requirements, and to impose appropriate sanctions on violators of this policy.

Because allegations of violations of this policy can sometimes raise challenging new issues and involve competing interests, the University reserves discretion to take reasonable actions to address those issues in a manner consistent with the spirit of this policy, and which preserves fairness for both parties and maintains the integrity of the investigation and complaint resolution processes.

There is no time limit for when an incident of sexual misconduct may be reported; however, reports should be made as soon as possible after the incident, preferably within one year, because the passing of time makes a review of the evidence more difficult and the memories of involved parties may become less reliable.

The Title IX Coordinator reserves the right to conduct an initial inquiry, investigate, or otherwise address any report, regardless of the time it is made, based on concern for the safety or well-being of the University community.

If, based on an initial inquiry into the report, the Title IX Coordinator determines that insufficient information exists to move forward or that the alleged misconduct, even if substantiated, would not be a violation of the policy, the Office of Equity may close the case, unless the Title IX Coordinator determines that the interests of the community warrant further action on the report by the Office of Equity or the University.

**1. Standard of review:** The University uses the preponderance of the evidence standard to determine responsibility of violations of this policy.

**2. Advisor/legal counsel:** Complainants and respondents may be accompanied by one advisor throughout the investigation and any hearing 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 or hearings. An advisor is a support person who is present to provide support to a complainant or respondent throughout an investigation and/or hearing. An advisor may not speak, write, or otherwise communicate with an investigator, hearing officer, or panel 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 not 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 is present. In all other matters, 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.

**3. Privacy and sharing of information:** The University considers complaints and investigations conducted under this policy to be private matters for the parties involved. For that reason, the University will protect the identity of persons involved in reports of sexual misconduct to the best of its ability. The University will only share personally identifiable information with persons with a need to know, in order for the University to investigate and respond or to deliver resources or support services. The University does not publish the names nor post identifiable information about persons involved in a report of sexual misconduct in the University Police Daily Crime Log (Blotter) or elsewhere online. However, the University cannot promise complete confidentiality or privacy in the handling of sexual misconduct reports or complaints.

Most situations require the disclosure of the complainant's identity to those involved in the investigation in order to fully investigate the matter and/or to enable the respondent to fully respond to the allegations. When individuals report allegations of sexual misconduct to the University and do not consent to the disclosure of their names and/or do not disclose the identity of the alleged offenders or identifiable information about the alleged offenders, the University's ability to respond to the complaints may be limited. In cases where an individual reporting sexual misconduct requests anonymity or does not wish to proceed with an investigation, the University will attempt to honor that request but, in some cases, the Title IX Coordinator, Deputy Title IX Coordinator for Students, or designee may determine that the University needs to proceed with an investigation based on concern for the safety or well-being of the broader University community (e.g., risk of future acts of sexual violence or a pattern of sexual misconduct). Northwestern reserves the right to take appropriate action in such circumstances, including in cases when the individual reporting the misconduct chooses not to proceed; however, the University will not compel an individual to participate.

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

Upon the conclusion of an investigation, the complainant and respondent will be notified in writing, at the same time, of the outcome of the investigation, including whether the alleged conduct was found to have occurred, and any sanctions imposed on the respondent that directly relate to the complainant. For the reasons noted above, the University encourages the parties to maintain the privacy of this communication.

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

The University offers a variety of training, awareness, and prevention programs to help prevent sexual misconduct within the Northwestern community. The University strives to ensure that such programming is developed to be culturally relevant; inclusive of diverse communities and identities; sustainable; responsive to community needs; 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 sexual misconduct, investigation, and resolution. For information on educational training, awareness, and prevention programs offered each year, see the

Appendices to each campus' [annual crime and safety report](http://www.northwestern.edu/up/your-safety/clery-act-safety-reports.html), posted at:  
<http://www.northwestern.edu/up/your-safety/clery-act-safety-reports.html>.

## **Consequences of Violating this Policy**

### *I. Sexual Misconduct Violations*

Violations of this policy may result in sanctions and corrective actions, which can include, but are not limited to:

- Verbal warning
- Written warning
- Advisory letter
- Conduct review
- Disciplinary hold on academic and/or financial records
- Performance improvement/management process
- Required counseling
- Required training or education
- Campus access restrictions
- 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
- Exclusion
- Expulsion
- Degree revocation
- 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, the University may take steps to remediate the effects of a violation on victims and others.

Following an investigation, the University may implement accommodations, and/or take other measures to eliminate any hostile environment caused by the sexual misconduct, prevent the recurrence of any sexual misconduct, and remedy the effects of the sexual misconduct on the

complainant and the University community. Such measures may include, but are not limited to, the interim measures and accommodations referenced in Procedures Section F, as well as counseling, training, and other measures.

## *II. Violations of Directives Related to Interim Measures and Accommodations*

Violations of directives related to interim measures and accommodations 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 exclusion, expulsion, or dismissal from the University; or termination of employment, including revocation of tenure.

## *III. 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 in Section I above, up to and including exclusion, 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 complaint that sexual misconduct has occurred.

## **Related Information**

*University policies and procedures*

[Faculty Handbook](#)

[Non-Retaliation](#)

[Reporting Suspected Child Abuse and Neglect](#)

[Sexual Misconduct Complaint Resolution Process](#)

[Staff Handbook](#)

[Student Handbook](#)

*Other information*

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

[EthicsPoint](#)

[Resource Guide on Sexual Misconduct and Title IX](#)

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

[University Police Annual Security & Fire Safety Report](#)

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

## **Contacts**

The following individual can address questions regarding this Policy:

Colleen Johnston, Title IX Coordinator, phone:(847) 491-3881, email:

[colleen.johnston@northwestern.edu](mailto:colleen.johnston@northwestern.edu) or

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

To report an incident of sexual misconduct to law enforcement—see [Procedures Section E1](#).

To report an incident of sexual misconduct to the University—see [Procedures Section E2](#).

To seek confidential support, advocacy, and counseling—see [Procedures Section D](#).

## **History**

Supersedes policy revision dated September 2016. Original policy was adopted in January 2014 and was later revised in 2014, 2015, and 2016.

## **Policy URL:**

[http://www.northwestern.edu/sexual-misconduct/docs/sexual\\_misconduct\\_policy.pdf](http://www.northwestern.edu/sexual-misconduct/docs/sexual_misconduct_policy.pdf)



## **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 Title IX Coordinator
6. Request Protective Measures
7. Preserve Evidence

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

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

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 (12km from Education City)**

Ahmed Bin Ali Street  
Emergency 24 hours a day, 7 days a week  
+974 4489 8901, +974 4489 8999, +974 4489 3349

##### **Women's Hospital (10km from Education City)**

Al Rayyan Road opposite Lulu Centre  
Emergency 24 hours a day, 7 days a week  
+974 4439 3299/3295

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)

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.

**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 Deputy Title IX Coordinator for more information.**

## **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 resource 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 negative 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 8261 / +974 4489 8817
Doha Clinic Hospital	+974 4438 4333
American Hospital	+974 4442 1999
Al Emadi Hospital	+974 4446 6009
Qatar Foundation for Protection and Social Rehabilitation	+974 4467 9444 / +974 4467 9429 Hotline: 919

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

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

Hamad Hospital	+974 4434 2421/2422
Psychiatry unit	+9744438 4599 (to make an appointment with a psychiatrist)
Rumaillah Hospital	+974 6671 9455
Family Consulting Center	+974 4489 2888 (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 Deputy Title IX Coordinator—Qatar Campus 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 after an attack. 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 don’t 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 Title IX Coordinator**

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 Title IX Coordinator or a Deputy Title IX Coordinator 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:**

Title IX Coordinator—Evanston Campus  
Contact: Colleen Johnston, Title IX Coordinator  
Email: [TitleIXCoordinator@northwestern.edu](mailto:TitleIXCoordinator@northwestern.edu)

Deputy Title IX Coordinator—Qatar Campus  
Contact: Pim Thukral, Chief Operations Officer  
Location: NU-Q 3-330  
Phone: +974 4454 5008  
Email: [pim.thukral@northwestern.edu](mailto:pim.thukral@northwestern.edu)

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

## **6. Request Interim Measures and Accommodations**

The University can put in place reasonable interim measures and accommodations measures to provide support to an individual who reports having experienced sexual misconduct. Such measures include academic assistance, housing or workspace relocation, time off from class or work, student financial aid arrangements, transportation arrangements, or no-contact directives. Individuals should contact the Title IX Coordinator or Deputy Title IX Coordinator to request interim measures and accommodations.

## **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 wash

clothes or bedding.

## **Appendix B: Sexual Misconduct Complaint Resolution Process**

The Sexual Misconduct Complaint Resolution Process can be found at

<http://www.northwestern.edu/sexual-misconduct/title-IX/complaint-resolution-process.html>

## Appendix C: Resources Not Subject to Mandatory Reporting

The University recognizes that students, staff, and faculty may want to speak with someone at the University about sexual misconduct without the information disclosed being reported to the Title IX Coordinator. Northwestern has designated the following staff, faculty, and paid student employees as resources who are not obligated to report disclosures or information about sexual misconduct to the Title IX Coordinator that they learn in the scope of their University work (except in very limited situations, such as when failure to disclose the information would result in imminent danger to the individual or to others or where federal or state law requires a report be made).

- All staff in the Center for Awareness, Response, and Education (CARE)\*
- All staff in Counseling and Psychological Services (CAPS)\*
- All staff in University Health Services (including all staff in the Office of Health Promotion and Wellness, team athletic trainers, and team physicians)<sup>7</sup>
- All staff in the Women's Center
- All staff in the Office of Religious and Spiritual Life\*
- All staff in the Faculty Wellness Program\*
- Emeritus Faculty who have been appointed Ombudsmen in the Faculty Ombudsman Program
- Paid student employees or graduate interns at any of the above offices (for information learned in the course of their work for these offices).

\*These offices are also designated On-Campus Confidential Resources, see Procedures Section D.

Note: Some staff and faculty may have a confidentiality privilege associated with 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 may have a confidentiality privilege with respect to information shared with them by patients, but they remain obligated to report sexual misconduct of which they become aware through work not related to patient care, such as work in labs, classroom, or student advising.

---

<sup>7</sup> Health Services staff are not obligated to report suspected sexual violence to the Title IX Coordinator. However, under Illinois law, medical personnel are required to alert police when it reasonably appears that a person requesting treatment may have sustained an injury as a victim of sexual violence. In some cases, police may then notify the University about the situation.