



CONNECTICUT COLLEGE

Department of Campus Safety

Annual Security Report and Crime Statistics 2023 Calendar Year

270 Mohegan Avenue
New London, Connecticut 06320

Emergency: internal extension 2222 or 2223
Routine Calls: (860) 439-2222 or internal extension 2222

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Introduction: Mission, Purpose, Values, and Organizational Structure

Connecticut College's current enrollment is 1,995 students (1959 full-time and 36 part-time). The student body is approximately 60.8 % women and 39.2 % men. For the fall 2023 semester, there were 1,970 full-time equivalent (FTE) students at the college, and 98.5% of those students lived in college-

owned or otherwise controlled housing. Additionally, there are about 750 employees (faculty and staff combined) at the college.

The Department of Campus Safety at Connecticut College plays a crucial role in upholding policies, ensuring security, and responding promptly to emergencies within our campus community. Our mission is centered on safeguarding the well-being of students, faculty, staff, and facilities while promoting an environment that balances security with the principles of freedom and individual rights within a supportive community.

Our primary responsibility is to ensure the safety and security of everyone and everything within our college community. We deliver our services with respect, fairness, compassion, and integrity, guided by both state and U.S. Constitutional provisions.

Under the leadership of the Director of Campus Safety and Emergency Operations, who reports to the Dean of Students and the Vice President of Finance and Administration, our department oversees institutional Clery Act compliance and manages daily patrol and security operations.

We maintain a 24/7 presence with a dedicated team, including the Director, Associate Director, ten full-time Campus Safety Officers (including Supervisors), and three On-Call/Part-Time Officers. All department personnel undergo rigorous background checks before joining our team. Our officers are non-sworn, operate on private property, and do not possess arrest powers. While we collaborate closely with law enforcement agencies to ensure campus safety, we do not have a formal memorandum of understanding (MOU) with them.

Our department enforces college policies and local laws and coordinates with local, state, and federal law enforcement agencies as needed. We support investigations of campus crimes in alignment with victims' wishes and legal requirements. Additionally, our officers receive comprehensive training and in security practices, crime prevention, emergency response, and other critical areas to enhance their capabilities.

We also coordinate the Clery Act Annual Security Report (ASR) and Annual Fire Safety Report (AFSR) compliance records. The Associate Dean of Equity and Compliance Programs is the Title IX Coordinator and oversees related investigations.

Campus Safety Officers conduct patrols across campus and off-campus college-controlled properties on foot, vehicle, and bike patrol. They also manage the Control Center (dispatch) and assist with life safety operations, parking and traffic enforcement, and event security. Student Patrollers support these efforts by assisting with safety escorts and emergency phone checks.

Our department emphasizes that campus safety is a collective responsibility, encouraging all community members to practice good safety habits, use available escort services, secure belongings, and promptly report suspicious activities. We actively engage in educational programs, preventive patrols, incident investigations, crime reporting, fire safety, and community outreach to promote a safe campus environment.

This publication informs the campus community about educational programs, safety practices, crime statistics, and emergency reporting policies. We are committed to continuous collaboration with our

community to enhance safety. For questions, comments, or suggestions regarding campus safety matters, please contact the Director of Campus Safety and Emergency Operations, Mary T. Savage, at (860) 439-2251. Visit the Department of Campus Safety Headquarters at Crozier-Williams College Center #217, 270 Mohegan Avenue, New London, CT 06320.

Crime/Emergency Reporting and College Response

Connecticut College's Department of Campus Safety urges students, faculty, and staff to promptly report any criminal activities, suspicious individuals, or emergencies to the department without delay. Timely and accurate reporting is crucial. It enables Campus Safety to assess incidents, issue timely warning notifications, maintain ongoing crime disclosures such as entries in the Daily Crime Log, and accurately document reported crimes in its annual statistical reports. The college also supports victims of crimes who choose to or cannot report incidents to Campus Safety and/or local law enforcement agencies.

To report a crime or emergency, members of the campus community should contact one of the following primary receivers of reports:

- Call Campus Safety Control Center by dialing (860) 439-2222 or (860) 439-2223 or on-campus extension 2222, 2223.
- Utilize the RAVE Mobile Safety App, which is monitored by Campus Safety and College Officials.
- Report in person to Campus Safety at the Gatehouse (Control Center).
- Crimes or emergencies can be reported to the New London Police or local emergency services by dialing 911.
- Sex Offenses and other incidents of sexual or relationship violence can also be reported to
 - The Dean for Institutional Equity and Inclusion and Title IX Coordinator, by dialing (860) 439-2624 or on-campus extension 2624 or in person at the Unity House, office #2,
 - The Director of Sexual Violence Prevention and Advocacy, by dialing (860) 449-2235 or on-campus extension 2235 or in person at the Unity House, office #4.
- The Office of Human Resources (HR) by dialing (860) 439-2085 or on-campus extension 2085, or in person at the HR office located in Strickland House
- Any Campus Security Authority (CSA), including but not limited to
 - The Office of Student Life (860) 439-2825 or on-campus extension 2825
 - Resident Education and Living Staff (REAL) (860) 439-2834 or on-campus extension 2834
 - Athletics (860) 439-2557 or on-campus extension 2557
- Emergency Phones located throughout campus can also be used to directly contact Campus Safety Control Center to report a crime, an emergency or when assistance is needed.
- Complete the online reporting forms by using one of the links below:
 - [Incident Reporting Form](#)
 - [Bias Incident Reporting Form](#)
 - [Sexual Misconduct Anonymous Report Form](#)
 - [CARE Team Referral Form](#)

*These forms should only be used for non-emergency or non-urgent reporting.

Response to reports: Campus Safety Controllers-Dispatchers are available 24 hours daily to answer campus community calls. Campus Safety procedures require an immediate response to emergency calls. Campus Safety Officers will immediately respond to the scene of the complaint and investigate. Campus Safety can summon assistance from off-campus emergency responders if deemed necessary and appropriate. In all cases where a student chooses to report crimes to a local law enforcement agency, the Department of Campus Safety can assist the student in making the notification.

When contacted directly by a complainant, local law enforcement agencies responding to an emergency or call for service are not obligated to inform campus officials. However, the Department of Campus Safety maintains a close relationship with local authorities and typically are notified of their presence on campus. In these cases, a Campus Safety officer will be dispatched to document the call. The college does not have authority over the investigative or legal proceedings that may follow when a crime is reported to the police.

Campus Safety responds to all reports of crimes and/or emergencies that occur on-campus, adjacent to campus within its public property reporting area, or within a campus-controlled, -owned, - operated, and/or -recognized facility, building, residence hall, or area. Students living off-campus in privately owned dwellings must abide by state and local laws and observe all city ordinances. Students living off campus are subject to the Student Code of Conduct in the Student Handbook. Connecticut College Campus safety officers do not respond to off-campus incidents.

If a sexual assault or rape should occur on campus, staff on the scene, including Campus Safety, will offer the victim a wide variety of resources and services. This publication contains information about on- and off-campus resources and services and is made available to the Connecticut College community. The information regarding “resources” is not provided to infer that those resources are “crime reporting entities” for Connecticut College.

As mentioned, crimes should be reported to Campus Safety to ensure inclusion in the annual crime statistics and to provide timely warning Campus Safety Alert notifications to the community when appropriate. For example, a crime reported only to the Connecticut College Counseling Services would not be known to Campus Safety, a Campus Security Authority (CSA), or other College officials.

Confidential Reporting:

Students may report confidentially to Pastoral Counselors or Professional Counselors within Student Counseling Services. In their professional capacity, these counselors do not submit identifiable reports to campus authorities unless the student specifically requests it. However, the College encourages counselors, when appropriate, to inform students that they have the option to report crimes to Campus Safety using the available reporting methods.

Statistical Disclosure of Reported Incidents

Incidents reported to Campus Safety that fall into one of the required reporting classifications defined by the Clery Act will be disclosed as a statistic in the appropriate crime table within this annual security and fire safety report published by the Department of Campus Safety.

Reporting A Crime to Law Enforcement

A person reporting a crime to Campus Safety has the right to report the crime to the New London, Waterford, and/or Connecticut State Police by calling 911. Campus Safety Officers regularly discuss this option with the victim of a crime and will assist the victim with that process.

Off-Campus Crime

If the local police department is contacted about criminal activity off-campus involving Connecticut College students, the police may notify Campus Safety. When students are off campus and become involved in a criminal investigation, they may be subject to arrest by the local police and to college disciplinary proceedings through the Office of Student Life.

Security of and Access to Campus Facilities

The 750-acre Connecticut College campus sits on a hill overlooking the Long Island Sound and the City of New London. The campus primarily resides in the City of New London. Small portions of the campus are located in the Town of Waterford. The college also operates a student residence hall at 250 State Street, located in the downtown portion of the city. The College has taken significant precautions to protect the safety of our students, such as security cameras in various publicly accessible areas of campus and some administrative and academic buildings on campus.

Residence Halls are accessible to Connecticut College students via proximity cards. Students may access all residence halls up to 2 am. At all other times, these proximity cards will only allow students access to the residence hall in which they live. Only students who live in apartment-style housing have access to their own apartments. All residence halls also have security cameras monitoring entry and exits. In addition, the exterior doors have prop door alarms that alert Campus Safety and the resident to the door being left open. College employees have access to residence halls on an "as-needed" basis as part of their job responsibilities.

The general public is welcome on campus during regular business hours and for special events. After hours, students, staff, and faculty must present a Camel Card for campus access. All campus gates, except the main gate, open at 5:00 a.m. and are secured at 10:00 p.m. during the academic year. During breaks, gates are secured at 8:00 pm. The main gate remains open 24/7, monitored by a Campus Safety Officer stationed in the Gatehouse (Control Center). Additionally, security cameras are in place to monitor key thoroughfares and parking areas.

Academic buildings are opened in the morning before classes and secured after the last classes have ended in the evening. Students who have been granted "special permission" by faculty may request access to an academic building after hours. The exterior doors remain secure. Many labs and specialty spaces are controlled by card access.

The facilities management maintains the college's buildings and grounds, focusing on sanitation, safety, and security. Repairs of a safety and security nature are made promptly. Immediate attention is also given to reports of potential safety and security hazards, such as broken windows and locks.

The college campus is well-lit, and further improvements are being made, including placing high-intensity lights on buildings and parking areas. Campus Safety Officers do a monthly lighting survey, and damaged or burnt-out lights are reported and repaired immediately. Officers all make recommendations in areas of campus where lighting should be enhanced.

There are twenty-two (22) outdoor blue light emergency phones. Additional indoor emergency phones are strategically placed across the campus, such as in elevator and refuge areas. These phones are connected directly to the Department of Campus Safety. All residence halls have at least one outside phone that can be used to call the Department of Campus Safety for emergencies.

Crime Prevention

Our commitment to creating a safe campus environment has been a priority well before campus safety became a national focus. Crime prevention is a shared responsibility, and education remains one of our most powerful tools in achieving that goal.

During orientation, all new students participate in discussions on campus crime and crime prevention with the Office of Student Life and Campus Safety. The education starts with the basics, such as locking your door even if you are out of your room for just a few minutes, not propping residence hall doors open, and reporting suspicious individuals. Students are also encouraged to be responsible for their own safety and that of others.

Additional programs on topics such as personal safety awareness and security, rape prevention, and the prevention of burglary and vandalism are conducted throughout the academic year. Information on safety and security is provided to students and employees regularly through posters, articles in campus publications, and an emergency notification system that promptly provides the entire campus with information about criminal activity or individuals who may be involved in suspicious activity.

The Director of Campus Safety and Emergency Operations is the College Campus Safety Liaison Committee chair. Committee members include student leaders from student government, student residential life staff, student activities, and student-at-large. In this committee, safety issues are discussed and resolved.

The Director of Campus Safety and Emergency Operations also assigns Crime Prevention Officers to oversee the crime prevention programs and disseminate crime prevention information to students and employees. These officers operate an information table during “new student move-in day” for students and parents of the class. Any safety concerns, including crime prevention and safety, are discussed. A campus safety pamphlet is given to all prospective students. The department also regularly sends emails to the campus community about topics related to public safety.

Safety Escorts –Students, faculty, and staff may request escorts from anywhere on campus to any destination. A walking or vehicle escort will be conducted by a Campus Safety Officer.

Campus Safety Alerts - Notifying Connecticut College About Crimes

To ensure timely notification of the Connecticut College community in the event of a criminal situation that may pose a serious or ongoing threat, a Campus Safety Alert (timely warning notice) is issued as soon as relevant information is available. These alerts, which protect the confidentiality of victims, are

designed to help prevent similar crimes. They are sent to all students and employees via text, email, and the Rave Alert Notification System. Alerts may also be communicated through the College's website, social media, and voice messaging system. A Campus Safety Alert aims to inform the campus of a criminal incident, allowing individuals to take reasonable precautions. Each alert provides enough detail to enable recipients to respond appropriately and help prevent further incidents.

Preparation and Dissemination of Timely Warnings

Shift supervisors are responsible for informing the Director of Campus Safety or the Director's designee of any reported incidents that may require a Campus Safety Alert. The Director of Campus Safety and Emergency Operations, or their designee, prepares these alerts to inform the college community about reported Clery Act crimes. The Dean of Students regularly reviews Campus Safety Alerts; however, the Director of Campus Safety and Emergency Operations can issue an alert without consultation if time does not allow. These alerts provide information on crimes occurring on campus, non-campus property, or public property when the incident is determined to pose a serious or ongoing threat to the College community.

Campus Safety Alerts may be issued for the following Clery Act crime classifications: murder, non-negligent manslaughter, sexual offenses (rape, fondling, incest, statutory rape), robbery, aggravated assault, burglary, arson, hate crimes, motor vehicle theft, domestic violence, dating violence, stalking, and arrests or referrals for liquor, weapons, and drug law violations. Alerts for crimes such as aggravated assault, motor vehicle theft, burglary, sexual offenses, domestic violence, dating violence, stalking, and arrests or referrals related to liquor, drug, or weapons laws are considered on a case-by-case basis. Factors include the crime's nature, the report's timing, and any ongoing threat to the campus—such as whether the perpetrator was apprehended or if issuing an alert would compromise law enforcement efforts. For instance, if a physical altercation occurs between two students due to a personal disagreement, there may be no ongoing threat to the broader campus community, and a Campus Safety Alert may not be issued. Typically, alerts are not issued for any incidents reported that are older than ten (10) days from the date of occurrence, as such a delay in reporting has not allowed the College to react or respond promptly.

Campus Safety Alerts may be distributed for other serious crimes if deemed warranted by the Director or the Director's designee in the Director's absence. Campus officials not subject to the timely warning reporting requirement are those with significant counseling responsibilities who provide confidential assistance to a crime victim, such as pastoral and professional counselors.

Non-Emergency Campus Safety Bulletin

The Director of Campus Safety and Emergency Operations or designee may send a Campus Safety Bulletin to the campus community for general crime prevention purposes, to inform the community of crimes and/or incidents that are not generally time-sensitive but important to be aware of, and/or to inform the campus of incidents occurring on, around, or even off campus that do not rise to the level warranting a Campus Safety Alert, as outlined above. A Campus Safety Bulletin will typically be sent via campus email to all students and employees on campus. A Campus Safety Bulletin is generally written and distributed to the campus community by the Department of Campus Safety in consultation with the Office of Communications or a designee.

Daily Crime and Fire Log

The Department of Campus Safety makes the Daily Crime and Fire Logs for the most recent 60-day period open to public inspection during normal business hours (typically Monday through Friday, from 8 am to 5 pm, except holidays) at the Campus Safety Gatehouse. Any portion of these crime and fire logs older than 60 days are available for public inspection within two business days of a written request. All confirmed fires occurring within or on any on-campus residential facilities will also be included in the Daily Crime and Fire Log. The crime and fire log information typically includes the incident number, crime classification or nature of the fire, date reported, date occurred, general location of crime or fire, and disposition of each reported crime or fire. Faculty, staff, and students are encouraged to review these logs periodically to become more familiar with the types and locations of criminal incidents and fires that may impact the College's campus community.

Unless the disclosure is prohibited by law or would jeopardize the confidentiality of the victim, newly reported crimes/incidents within the college's Clery geography and updated information regarding previously reported crimes are entered into the Daily Crime and Fire Log within two business days of when it is reported to Campus Safety. It is important to note that Campus Safety has no jurisdiction outside its identified Clery geography.

Preparation of Annual Disclosure of Crime Statistics & Clery Compliance

The Connecticut College Department of Campus Safety is responsible for preparing the Annual Security Report and Crime Statistics and the Annual Fire Safety Report and Fire Statistics. This responsibility is designated to the Director of Campus Safety and Emergency Operations or designee. All policy disclosures in this report are reviewed for updates or revisions annually. The procedures for preparing the annual disclosure of crime statistics include reporting statistics to the College community obtained from the following sources: The New London Police Department, Waterford Police Department, Connecticut State Police, and non-police or public safety personnel designated as Campus Security Authorities or CSAs. The Division of Student Life is a key area from which drug, liquor, and weapon offense referral data is obtained. All Clery Crimes statistics reported to the Department of Campus Safety, Division of Student Life, the Division of Institutional Equity and Compliance, and Campus Security Authorities (CSA) are collected by the Department of Campus Safety.

A written request for statistical information is made at least annually to all Campus Security Authorities or CSAs (as defined by federal law). CSAs are also informed in writing and/or through training to report crimes to Campus Safety promptly so those crimes can be evaluated for timely warning purposes. A Campus Security Authority or CSA is a Clery-specific term that encompasses four groups of individuals and organizations associated with an institution:

- A campus police department or a campus public safety department of an institution.
- Any individual or individuals who have responsibility for campus security but who do not constitute a campus police department or a public safety official (e.g., an individual who is responsible for monitoring the entrance into institutional property)
- Any individual or organization specified in an institution's statement of campus security policy as an individual or organization to which students and employees should report criminal offenses
- An official of an institution who has significant responsibility for student and campus activities, including, but not limited to, student housing, student discipline, and campus judicial proceedings. An **Official** is defined as any person who has the authority and the duty to take action or respond to particular issues on behalf of the institution.

Statistical information is not requested from or provided by professional counselors of the Counseling Center or Pastoral Counselors performing that function and role as they are employed with the College. Professional Counselors and Pastoral Counselors are not required by law to provide statistics for this compliance document. Counseling and Pastoral professionals, as defined by Federal law, who act in such capacities have been advised that, while they are not obligated to report crimes to compile these statistics, they are encouraged, when they deem it appropriate, to inform the persons they are counseling of their ability to report any crimes to the Department of Campus Safety for inclusion in the annual statistics.

All statistics are gathered, compiled, and reported to the college community via these two reports, entitled the “Annual Security Report” and “Annual Fire Safety Report,” published by the Department of Campus Safety no later than October 1st of each year. Campus Safety submits the annual crime statistics published in this brochure via a Web-based reporting system to the Department of Education. The statistical information gathered by the Department of Education is available to the public through the ED website.

The Office of Communications sends an announcement to the college community on an annual basis informing them of the availability of the Annual Security and Fire Safety Reports.

The Connecticut College Annual Fire Safety Report and Fire Statistics can be found here <https://www.conncoll.edu/campus-life/campus-safety/clery-information-crime-statistics/>

Specific Information about Classifying Crime Statistics:

The statistics in this brochure are published by the definitions and many of the standards and guidelines used by the FBI Uniform Crime Reporting (UCR) Handbook, National Incident-Based Reporting System (NIBRS), relevant federal law (the Clery Act), and applicable State law.

Immediate or Emergency Notification, Emergency Response, and the Rave Alert

Connecticut College has a Comprehensive Emergency Management Plan (CEMP) regularly reviewed and updated by a campus committee chaired by the Vice President for Finance and Administration. The plan provides detailed information on responding to emergencies of all types. The College is also in regular contact with first responders for the City of New London.

The College's internal Incident Management Team (IMT) includes representatives from all relevant divisions and offices. Team members meet regularly and use training and tabletop simulations to improve their ability to respond to emergencies.

The CEMP addresses procedures for the immediate notification of the campus community upon confirmation of a significant emergency or dangerous situation occurring on or near the campus that involves an immediate threat to the health or safety of students or employees. A threat is imminent when the need for action is instant, overwhelming, and leaves no moment for deliberation. Such situations include but are not limited to, a hazardous materials incident requiring shelter-in-place or evacuation, an armed intruder on or near campus, an approaching tornado, or a fire actively raging in a campus building.

Students, faculty, staff, and others may access the Emergency Response Quick Reference Guide on the College's public website. Please refer to the [Environmental Health and Safety web page](http://www.conncoll.edu/offices/environmental-health-and-safety/emergency-response/) for more information on emergency response for Bomb Threats and Suspicious Packages, Evacuation Procedures, Fire and Explosions, Hazardous Material Spills, Hostile Intruders/Violent Individuals, Off-Campus Nuclear Emergencies, On-Campus Radiological Emergencies, Severe Weather and Natural Disasters, and Utility Failure. <http://www.conncoll.edu/offices/environmental-health-and-safety/emergency-response/>.

To increase its effectiveness, it is Connecticut College's policy to review and amend the Comprehensive Emergency Management Plan (CEMP) annually and whenever (1) it fails in an emergency, (2) operations or maintenance change in a manner likely to impact the plan's effectiveness, (3) some other circumstance significantly increases the potential for fires, explosions, or releases of hazardous materials or changes the response necessary for an emergency, (4) exercises and drills suggests amendment is necessary (5) the emergency response coordinator changes or emergency equipment list changes and (6) an environmental regulator, with jurisdiction over Connecticut College, deems a change to be necessary.

The Rave Alert Notification System (CC Alert) allows the College to quickly communicate information to potentially affected individuals, simultaneously sending email, voice announcements, and text messages. All students, faculty, and staff members will receive emergency messages on wired and wireless telephones, cell phones, and computers in a campus emergency. The Rave Alert Notification System leaves a message in the user's voicemail if no one answers the phone. It will report back to those who received the message and when they received it.

To ensure the system is operating properly and contains accurate contact information, a test message is sent at least once per semester. This emergency notification requirement does not replace the "timely warning" requirement.

In an emergency, Campus Safety is notified by dialing (860) 439-2222, (860) 439-2223, or by internal extension 2222 or 2223. Local police agencies can be notified by dialing 911. Campus Safety Officers and/or Supervisors act as first responders and will use all precautions. The Supervisor will determine the type and magnitude of the emergency. If it is a significant emergency, protocols are followed to notify New London Police Department (NLPD) and/or New London Fire Department (NLFD), Director of Campus Safety and Emergency Operations, and other departments such as the Office of Residential Education and Living, Office of Student Life and Facilities Management personnel. Based on the magnitude of the emergency, the Campus Safety Controller/Dispatcher will activate the Emergency Notification System for the College community.

The Director of Campus Safety and Emergency Operations will notify the Vice President for Finance and Administration, who will then inform the College President, the Dean of Students, and other necessary members of the Incident Management Team (IMT). In collaboration with the Vice President of the Office of Communications, the IMT will determine which segments of the College community should be notified. The content of the notification will be based on the nature of the incident, its context, any immediate threat to campus safety, and whether community members require action. Once the message content is finalized, the Emergency Notification System will be activated as quickly as possible to update the College community on the emergency.

There may be instances when notification is delayed if it would hinder efforts to assist victims or contain, respond to, or mitigate the emergency. Updates will be sent as needed to keep the community informed about the status of the emergency. Once the situation is resolved, an "all clear" message will be issued via the same communication channels. Local police and emergency responders, including the New London Police Department, are also alerted directly by phone in case of an on-campus emergency that threatens the College or nearby community.

Once a year, the Incident Management Team (IMT) performs a tabletop drill to test the emergency procedures. The Vice President for Finance and Administration chairs the team. Procedures are reviewed annually and updated as needed. Documentation, including the exercises' date and time, is maintained at the Vice President for Finance and the Administration's office.

Campus Evacuation Procedures:

Local, state, or federal authorities will initiate any order to evacuate the City of New London, including Connecticut College. Upon confirmation of the emergency and after consultation with the Director of Campus Safety and Emergency Operations, the President will order the campus evacuation. Evacuation information will be communicated via the Emergency Alert Notification system.

The Office of Residential Education and Living staff will conduct a room-by-room check to ensure that all students have been evacuated.

Law enforcement and traffic control will likely be dispatched to predetermined locations along evacuation routes. Evacuees will be directed out of the 10-mile Emergency Planning Zone and to the appropriate Evacuation Assembly Center.

If an evacuation is announced, drive to the Evacuation Assembly Center broadcast over the local Emergency Alert System radio station. Listen to the station for any changes as you drive. Adhere to the speed limits on the highways.

Fire/Evacuation Drills

Unannounced Fire/Evacuation drills are conducted once a semester (twice a year) for Residential Halls and Student Housing and once a year for Academic/Administration buildings. Information on building/campus evacuation is publicized on the Department of Environmental Health and Safety website. Documentation for fire drills is maintained in the Campus Safety office at Campus Safety Administration Office, located in Crozier Williams College Center #217.

<http://www.conncoll.edu/offices/environmental-health-and-safety/emergency-response/>

Campus Incident Management Team (IMT)

President of the College - Emergency Director

Vice President for Finance & Administration – Incident Commander

Director of Campus Safety and Emergency Operations – Emergency Response Coordinator

Associate Director of Campus Safety- Safety Officer

Dean of Students – Student Liaison

Director of Public Relations – Public Information Officer

Director of Environmental Health and Safety – Hazardous Materials and Oil Spills Coordinator

Director of Facilities Management – Damage Control Officer
Director of Technical Support – Technical Support Coordinator
Campus Safety Supervisors – First Responders

ALCOHOL AND ILLICIT DRUG POLICIES

Connecticut College’s policy on alcohol and other drugs balances institutional commitment to local, state, and federal laws, the responsibility of individuals on our campus, and the health and safety of our community while upholding the college's educational mission. The College is committed to providing campus education on the risks associated with alcohol and other drug use and misuse. Our policies and procedures strive to prevent the harm that may result from the misuse and abuse of these substances.

The College is committed to upholding local, state, and federal law, requiring proper management of events where alcohol is served, employing practices that minimize the misuse of alcohol and other drugs, and maintaining a drug-free workplace.

This policy and procedures apply to faculty, staff, students, and any individuals utilizing college-owned or managed properties. It supplements the expectations outlined in the Employee Handbook and IFF, including but not limited to the Drug-Free Workplace Act, and Prohibited Alcohol Related Activity policy, and the Personal Conduct Policy. A summary of local, state, and federal guidelines may be referred to in [Appendix B](#).

Alcohol

Individuals under the age of twenty-one may not possess or consume alcohol on campus. Individuals twenty-one or older may not (a) provide alcohol to individuals under the age of twenty-one, (b) possess open containers of alcohol outside of registered event spaces, or (c) play drinking games on campus. The alcohol policy also encompasses guidelines for service and use on campus.

Alcohol may not be served in an academic class regardless of the class location or in an individual office space. The College strongly discourages alcohol being served to any student in the private residences of faculty and staff (on or off campus) and serving alcohol to underage students is impermissible regardless of location. Alcohol consumption on College sponsored trips in foreign countries (i.e. SATA, TRIPs) follows the law of the country. Irrespective of location, faculty and staff who serve or support consumption of alcohol by students have a responsibility to try to ensure that the students drink responsibly.

College employees are responsible for adhering to College policies regarding personal alcohol consumption at College events. Typically, consumption of alcohol is limited to appropriate business settings as determined by the department head (academic chair, vice president/ dean, or president). According to the College’s personal conduct policy for staff, staff may not use or be under the influence of alcohol or narcotics during work hours. This policy recognizes that work hours may be defined differently based upon an employee’s role at the College. When alcohol is served at an official College function during business hours, a staff member may choose to consume alcohol responsibly as long as they are not returning to work following the function.

Violations of the Alcohol Policy may be classified accordingly:

Underage alcohol possession and/or use – Students under the age of 21 may not possess or consume alcohol.

Open Container of Alcohol – Individuals who are 21 or older may not possess an open container of alcohol in any public space or vehicle on/off campus.

Drinking Games/Drinking Paraphernalia - Drinking games, including simulated drinking games such as water pong, promote abuse of alcohol, which can lead to alcohol poisoning. For this reason, drinking games/paraphernalia are prohibited regardless of age. Drinking paraphernalia includes, but is not limited to beer/water pong tables, funnels, and Beirut tables.

Providing Alcohol to a Minor – Individuals twenty-one and older may not provide alcohol to a person under the age of twenty-one. This includes accepting money via Venmo (or similar app) from an underage individual to purchase alcohol.

Illegal Keg (more than 5 liters) – Kegs are not permitted on campus except at College-sponsored functions registered with the Events Office.

Misuse of Alcohol Possession and/or Use - Negative behaviors occurring on or off campus that result from being under the influence of alcohol/drugs (regardless of age) are unacceptable.

Drugs

The use, possession, or sale of illicit drugs or drug-related paraphernalia as defined by Connecticut College and/or applicable federal and state laws is strictly prohibited on Connecticut College campus property. Illicit drugs are controlled substances that cannot be obtained legally or that, although available legally, have been obtained illegally. *Marijuana (including medically prescribed) is prohibited on college campuses by the federal Drug Free Schools and Communities Act, regardless of whether it is permitted by state law.* Distribution of illicit drugs includes the purchase, sale, or other transfer of any substance in any amount, and any attempt to distribute. The possession of drug-related paraphernalia (i.e. bongs, water pipes, vaporizers, grinders) is also prohibited. Examples of illicit drugs include: marijuana, molly (MDMA), cocaine, synthetic drugs, salvia, prescription drugs that have not been lawfully prescribed for the individual, and the misuse of legally prescribed drugs by the individual to whom the drugs were prescribed.

The College reserves the right to notify the appropriate law enforcement agency regarding illegal alcohol and drug activity. An employee who is convicted of any criminal drug statute is required to notify the Office of Human Resources within five (5) days of such conviction. The College may take disciplinary action against any employee who is so convicted and/or require the employee to participate in a substance abuse assistance or rehabilitation program. Students violating the College's alcohol or drug policy or local/state/federal laws will be subject to the student conduct process outlined in the [Student Handbook](#).

Any employee or student who is misusing or abusing alcohol or other drugs is urged to stop such activity voluntarily and to participate in counseling or rehabilitation programs. Student Counseling and

Health Services offers assistance to students. Employees may seek assistance through the College's Employee Assistance Program and the College's health insurance plans. Information about the Employee Assistance Program can be found in the Employee Handbook and the employee benefits web page (www.conncoll.edu/employment/benefits/). Information about resources for students may be found on p.45 and in Appendix B.

Prescription Drugs

Students are responsible for securing their prescription medication.

- The misuse and distribution of prescription drugs is a violation of campus policy.
- Prescribed medical marijuana is not permitted on campus in accordance with the federal Drug Free Schools and Communities Act.

Violations of the Illicit Drug Policy may be classified accordingly:

Drug Possession and/or Use – The use or possession of illicit drugs or drug related paraphernalia is not permitted. Illicit drugs are controlled substances that cannot be obtained legally or that, although available legally, have been obtained illegally or are not permitted on campus. Examples of illicit drugs include: marijuana (including edible marijuana), molly (MDMA), cocaine, synthetic drugs, and salvia. This also includes prescription drugs that have not been lawfully prescribed for the individual and the misuse of legally prescribed drugs by the individual to whom the drugs were prescribed.

- Marijuana (including medically prescribed) is prohibited on college campuses by the federal Drug Free Schools and Communities Act, regardless of whether it is permitted by state law.
- The possession of drug-related paraphernalia (e.g. bongos, water pipes, vaporizers, grinders) is also prohibited.
- Receiving illicit drugs through the College's post office is prohibited and may warrant police notification.

Distribution of Illicit Drugs - Distribution of illicit drugs and/or prescription drugs includes purchase, sale, or other transfer of any substance in any amount, or any attempt to distribute.

Campus Safety Enforcement of Alcohol and Other Illicit Drug Policy

Campus Safety enforces the federal, state, local law and the Colleges Alcohol and Other Illicit Drug policy. Incident reports, including but not limited to, underage use or possession of alcohol or use or possession of illegal drugs are referred to the Office of Student Life for disciplinary action and/or, if necessary, the local police department may be contacted and the individual may be arrested.

For additional information on Connecticut Statutes, go to:

<https://www.jud.ct.gov/lawlib/law/liquor.htm> and <https://www.jud.ct.gov/lawlib/law/drugs.htm>
or refer to the [Student Handbook](#), Appendix B page 224.

Programs, Resources, and Additional Information

Connecticut College is committed to establishing a workplace and campus environment that is free from the influence of drugs for all its employees and students. The Office of Student Life, Student Health and Counseling Services, and the Human Resources Department collaborate to offer support, treatment options, and referrals to individuals within our community who may be dealing with substance abuse issues. Additionally, the Office of Student Life and Human Resources jointly administer educational

initiatives aimed at raising awareness and providing valuable information to both students and employees.

Opioid Prevention Project: In partnership with Connecticut Healthy Campus Initiative (CHCI) through the Connecticut Department of Mental Health and Addiction Services (DMHAS), the College implemented a robust opioid education and awareness campaign. These efforts include education around safe medication practice (storage/disposal), providing medication disposal bags, and naloxone training.

CHOICES is a risk reduction and substance abuse prevention program for college students. Students are presented with information and then given the opportunity to reflect on their personal choices through personal interactive journals. The CHOICES program is presented in a non-confrontational, nonjudgmental manner that enables students to make their own informed decisions about alcohol consumption and substance abuse. The program is facilitated by the Director of Student Wellness and Alcohol/Drug Education.

BASIC: The primary objective of these one-on-one meetings is to assist a student in decreasing risky behaviors and the harmful effects of alcohol.

AlcoholEdu for College is an interactive online program designed to reduce the negative consequences of alcohol amongst students.

Other campus outreach events include partnering with faculty in the classroom, residence hall programs, and Fresh Check Day (campus-wide mental health and wellness fair) for students.

List of Education, Prevention and Intervention Programs in 2021

- Online Prevention: AlcoholWise and MarijuanaWise
- CHOICES AOD Workshop
- BASIC (Brief Alcohol Screening and Intervention for College Students)
- Blood Alcohol Content Informational Tabling
- AOD focused student leader training and orientation sessions.

The programs cover the dangers of alcohol and drug abuse, availability for counseling and rehabilitation, and penalties for violation of college policies. More information and complete description of the college drug and alcohol policies; educational programs; and sanctions may be found in the Student Handbook (page 238) and the following links below to the websites:

Employee Handbook (login required):

Student Handbook (login required):

Student Wellness and Alcohol and Drug Education:

Student Health and Counseling Services:

Employee Assistance Program -

An Employee Assistance Program (EAP) provides confidential counseling services to employees and their household members free of charge. Through the EAP, each individual is to have up to three sessions of confidential counseling. More information can be found [here](#).

Where to call for assistance:

Student Counseling Services	(860) 439-4587
Student Health Services	(860) 439-2275
Student Wellness, Alcohol/Other Drugs	(860) 439-2826
Alcoholics Anonymous	(860) 447-2190
Narcotics Anonymous	(800) 627-3543

AA meetings on campus are posted in the Student Health and Counseling Services Offices.
Employee Assistance Program (EAP): (800) 225-2527 or (800) 252-4555

A complete list of off-campus resources is provided to students by Student Health Services and Student Counseling Services upon request.

Health risks associated with the use of illicit drugs can be found on the National Institute on Drug Abuse website at <http://www.drugabuse.gov/>, and those associated with the abuse of alcohol can be found on the National Institute on Alcohol Abuse and Alcoholism website at <http://www.niaaa.nih.gov>.

**CONNECTICUT COLLEGE EQUAL OPPORTUNITY, HARASSMENT, AND
NONDISCRIMINATION POLICY FOR ALL STUDENTS, FACULTY, EMPLOYEES, AND THIRD
PARTIES (Hereinafter, “the Policy”)**

Purpose

Connecticut College is committed to providing an educational and employment environment that is free from discrimination based on protected characteristics, harassment, and retaliation for engaging in protected activity.

The College values and upholds the equal dignity of all members of its community and strives to balance the Parties' rights in the resolution process during what is often a difficult time for all involved.

To ensure compliance with federal, state, and local civil rights laws and regulations and to affirm its commitment to promoting the goals of fairness and equity in all aspects of the Education Program or Activity, the College has developed policies and procedures that provide for prompt, fair, and impartial resolution of allegations of Protected Characteristic discrimination (the bulleted list below) or harassment based on protected characteristics, or allegations of retaliation.

Notice of Nondiscrimination

The College seeks to comply with all federal, state, and local laws, regulations, and ordinances prohibiting discrimination in private post-secondary education institutions.

The College does not discriminate against any employee, applicant for employment, student, or applicant for admission on the basis of the following protected characteristics:

- Age
- Citizenship status
- Color
- Creed
- Disability (physical or mental)
- Domestic violence victim status
- Ethnicity
- Gender expression
- Gender identity
- Genetic information (including family medical history)
- Lawful source of income
- Marital status
- National origin (including ancestry)
- Pregnancy or related conditions
- Race
- Religion
- Sex
- Sexual orientation
- Veteran or military status (including disabled veteran; recently separated veteran; active-duty, wartime, or campaign badge veteran; and Armed Forces Service Medal veteran)
- Any other status protected by federal, state, or local law

This Policy covers nondiscrimination in both employment and access to educational opportunities, including the process of application for employment or application for admission. Therefore, any

member of the College community whose acts deny, deprive, unreasonably interfere with or limit the education or employment, residential and/or social access, benefits, and/or opportunities of any member of the College's community, guest, or visitor on the basis of that person's actual or perceived protected characteristic(s), is in violation of this Policy.

The College will promptly and effectively address any such discrimination of which it has Knowledge/Notice using the resolution process in the Equal Opportunity, Harassment, and Nondiscrimination Procedures.

Nondiscrimination Contacts

The College has appointed the Office of Equity and Compliance Programs, to coordinate the College's compliance with federal, state, and local civil rights laws and ordinances:

For sex discrimination, sex-based harassment, retaliation, and all other forms of discrimination and discriminatory harassment allegations:

Associate Dean for Equity and Compliance Programs/Title IX Coordinator

Megan D. Monahan, J.D.

Associate Dean for Equity and Compliance Programs/Title IX Coordinator

Room 2

Unity House

270 Mohegan Avenue

New London, CT 06320

860-439-2624

mmonahan@conncoll.edu

<https://www.conncoll.edu/title-ix/>

Erika J. Smith, PhD, EdM

Dean of the College and Interim Dean of Equity and Inclusion

Connecticut College

270 Mohegan Avenue

New London, CT 06320

esmith25@conncoll.edu

The Nondiscrimination Team is responsible for providing comprehensive nondiscrimination education and training; coordinating the College's timely, thorough, and fair response, investigation, and resolution of all alleged prohibited conduct under this Policy; and monitoring the effectiveness of this Policy and related procedures to ensure an education and employment environment free from discrimination, harassment, and retaliation.

The College recognizes that allegations under this Policy may include multiple forms of discrimination and harassment as well as violations of other the College policies; may involve various combinations of students, employees, and other members of the College community; and may require the simultaneous attention of multiple College departments. Accordingly, all the College departments will share information, combine efforts, and otherwise collaborate, to the maximum extent permitted by law and

consistent with other applicable the College policies, to provide uniform, consistent, efficient, and effective responses to alleged discrimination, harassment, or retaliation.

External Contact Information

Concerns about the College's application of this Policy and compliance with certain federal civil rights laws may also be addressed to:

Office for Civil Rights (OCR)
U.S. Department of Education
400 Maryland Avenue, SW
Washington, D.C. 20202-1100
Customer Service Hotline #: (800) 421-3481
Facsimile: (202) 453-6012
TDD#: (877) 521-2172
Email: OCR@ed.gov
Web: <http://www.ed.gov/ocr>

Office for Civil Rights (OCR)
Boston Office
8th Floor, 5 Post Office Square
Boston, MA, 02109-3921
Email: OCR.Boston@ed.gov

For Complaints by employees:

Connecticut Commission on Human Rights and Opportunities (CHRO)
450 Columbus Boulevard
Suite 2
Hartford, CT, 06103

Equal Employment Opportunity Commission (EEOC)
EEOC Regional Office
33 Whitehall Street, 5th Floor
New York, NY, 10004

Mandated Reporting and Confidential Employees

All Connecticut College faculty and employees (including REAL student-employees), other than those deemed Confidential Employees, or other student-employees as described below, are Mandated Reporters and are expected to promptly report all known details of actual or suspected Prohibited Conduct, as defined in Section 12, including discrimination, harassment, retaliation and/or Other

Prohibited Conduct (as defined in Section 12.D.) to appropriate officials immediately, although there are some limited exceptions. Supportive measures may be offered as the result of such disclosures without formal College action.

Complainants may want to carefully consider whether they share personally identifiable details with Mandated Reporters, as those details must be shared with the Title IX Coordinator (the “Coordinator”).

If a Complainant expects formal action in response to their allegations, reporting to any Mandated Reporter can connect them with resources to report alleged crimes and/or Policy violations, and these employees will immediately pass Notice to the Coordinator (and/or police, if desired by the Complainant or required by law), who will act when an incident is reported to them.

The following sections describe the College’s reporting options for a Complainant or third party (including parents/guardians when appropriate):

Confidential Employees

There are three categories of Confidential Employees: 1) Those with confidentiality bestowed by law or professional ethics, such as lawyers, medical professionals, clergy, and mental health counselors; 2) Those whom the College has specifically designated as Confidential Resources for purposes of providing support and resources to the Complainant; and 3) Those conducting human subjects research as part of a study approved by the College’s Institutional Review Board (IRB). For those in category 1), above, to be able to respect confidentiality, they must be in a confidential relationship with the person reporting, such that they are within the scope of their licensure, professional ethics, or confidential role at the time of receiving the Notice. These individuals will maintain confidentiality except in extreme cases of immediacy of threat or danger or abuse of a minor, elder, or individual with a disability, or when required to disclose by law or court order.

To enable Complainants to access support and resources without filing a Complaint, the College has designated specific employees as Confidential Resources. Those designated by the College as Confidential Resources are not required to report actual or suspected discrimination, harassment, or retaliation in a way that identifies the Parties. They will, however, provide the Complainant with the Coordinator’s contact information and offer options and resources without any obligation to inform an outside agency or the College official unless a Complainant has requested the information be shared.

If a Complainant would like the details of an incident to be kept confidential, the Complainant may speak with the following Confidential Employees:

Confidential Employees

On-campus licensed professional counselors and staff

On-campus health service providers and staff

On-campus members of the clergy/chaplains working within the scope of their licensure or ordination

Director of Religious and Spiritual Programs, Rev. Stephanie Haskins, 860-439-2450,
shaskins1@conncoll.edu
Director of Zachs Hillel House, Rabbi Susan Schein, 860-439-5165, sschein@conncoll.edu

Designated Confidential Resources

Director of Sexual Violence Prevention and Advocacy, Nicole Powell, 860-439-2235,
spowell2@conncoll.edu
SVPA Office Student Fellows
Director of Race and Ethnicity Programs, Christopher Campbell, 860-439-2535,
ccampbell1@conncoll.edu
Director of Gender and Sexuality Programs, Justin Mendillo, jmendill@conncoll.edu

The Employee Assistance Program (EAP) is available to help employees free of charge and may be consulted on an emergency basis during normal business hours. Connecticut College's EAP provider, Higher Ed EAP, can be reached at 1-800-252-4555 or 1-800-225-2525. In addition, their website at www.HigherEdEAP.com contains helpful information.

Employees who have confidentiality as described above, and who receive Notice within the scope of their confidential roles will timely submit anonymous statistical information for Clery Act statistical reporting purposes unless they believe it would be harmful to their client, patient, or parishioner.

Similar to employees who have confidentiality, student-employees (other than REAL student-employees) are not required to report actual or suspected discrimination, harassment, or retaliation in a way that identifies the Parties, however, when they receive Notice during their working hours, they will provide the Complainant with the Coordinator's contact information and offer options and resources without any obligation to inform an outside agency or the College official unless a Complainant has requested the information be shared.

Failure of a Mandated Reporter, as described above in this section, to report an incident of discrimination, harassment, or retaliation of which they become aware is a violation of the College Policy and can be subject to disciplinary action for failure to comply/failure to report. This also includes situations when a harasser is a Mandated Reporter. Such individuals are obligated to report their own misconduct, and failure to do so is a chargeable offense under this Policy.

A Mandated Reporter who is themselves a target of discrimination, harassment, or other misconduct under this Policy is not required to report their own experience, though they are, of course, encouraged to do so.

In addition, Complainants may speak with individuals unaffiliated with the College without concern that the Policy will require them to disclose information to the institution without permission:

- Licensed professional counselors and other medical providers
- Local rape crisis counselors
- Domestic violence resources
- Local or state assistance agencies
- Clergy/Chaplains

Attorneys

Disability-based Grievances and Complaints; Disability Accommodations

Grievances related whether reasonable accommodations have been provided are addressed using the Student Accessibility Services (SAS) Grievances Policy. However, allegations of discrimination on the basis of an actual or perceived disability, including instances in which the provision of reasonable accommodations has a discriminatory effect, will be resolved under this Policy.

For details relating to disability accommodations in the College's Resolution Process contact either Student Accessibility Services or Human Resources and visit this webpage.

Scope

This Policy is only applicable to alleged incidents that occur on or after August 1, 2024. For alleged incidents of sex discrimination or sexual harassment occurring prior to August 1, 2024, the policy and procedures in place at the time of the alleged incident apply. Applicable versions of those policies and procedures are available from the Coordinator and at this webpage.

This Policy applies to all faculty, employees, students, and other individuals participating in or attempting to participate in the College's program or activities, including education and employment.

This Policy prohibits all forms of discrimination on the basis of the protected characteristic(s) listed in Section 2, and may be applied to incidents, to patterns, and/or to the institutional culture/climate, all of which may be addressed in accordance with this Policy.

Jurisdiction

This Policy applies to the College's Education Programs and Activities (defined as including locations, events, or circumstances in which the College exercises substantial control over both the Respondent and the context in which the conduct occurred), circumstances where the College has disciplinary authority, and to misconduct occurring within any building owned or controlled by a College-recognized student organization. A Complainant does not have to be a member of the College community to file a Complaint, at the discretion of the Coordinator.

This Policy may also apply to the effects of off-campus discriminatory, harassing or retaliatory misconduct that limit or deny a person's access to the College's Education Program or Activities. The College may also extend jurisdiction to off-campus and/or to online conduct when the conduct affects a substantial College interest. See section 10 below.

A substantial College interest includes:

Any action that constitutes a criminal offense as defined by law. This includes, but is not limited to, single or repeat violations of any local, state, or federal law.

Any situation in which it is determined that the Respondent poses an imminent and serious threat to the health or safety of any student, employee, or other individual.

Any situation that significantly impinges upon the rights, property, or achievements of others, significantly breaches the peace, and/or causes social disorder.

Any situation that substantially interferes with the College's educational interests or mission.

For disciplinary action to be issued under this Policy, the Respondent must be a Connecticut College faculty member, student, or employee at the time of the alleged incident. If the Respondent is unknown or is not a member of the College community, the Coordinator will offer to assist the Complainant in identifying appropriate institutional and local resources and support options, and will implement appropriate supportive measures and/or remedial actions (e.g., issuing a no trespass notice to an individual who is not a member of the College community). The College can also assist in contacting local or institutional law enforcement if the individual would like to file a police report about criminal conduct.

All vendors serving the College through third-party contracts are subject to the policies and procedures of their employers to which their employer has agreed to be bound by their contracts with the College.

When a party is participating in a dual enrollment/early college program, the College will coordinate with the party's home institution to determine jurisdiction and coordinate providing supportive measures and responding to the complaint under the appropriate policy and procedures based on the allegations and identities of the Parties.

When the Respondent is enrolled in or employed by another institution, the Coordinator can assist the Complainant in contacting the appropriate individual at that institution, as it may be possible to pursue action under that institution's policies.

Similarly, the Coordinator may be able to assist and support a student or employee Complainant who experiences discrimination in an externship, study abroad program, or other environment external to the College where sexual harassment or nondiscrimination policies and procedures of the facilitating or host organization may give the Complainant recourse. If there are effects of that external conduct that impact a student or employee's work or educational environment, those effects can often be addressed remedially by the Coordinator if brought to their attention.

Supportive Measures

The College will offer and implement appropriate and reasonable supportive measures to the Parties upon Notice of alleged discrimination, harassment, and/or retaliation. Supportive measures are non-disciplinary, non-punitive individualized services offered as appropriate and reasonably available. They are offered, without fee or charge to the Parties, to restore or preserve access to the College's Education Program or Activity, including measures designed to protect the safety of all Parties and/or the College's educational environment and/or to deter discrimination, harassment, and/or retaliation.

The Coordinator will promptly make supportive measures available to the Parties upon receiving Notice/Knowledge or a Complaint. At the time that supportive measures are offered, if a Complaint has not been filed, the College will inform the Complainant, in writing, that they may file a Complaint with

the College either at that time or in the future. The Coordinator will work with a party to ensure that their wishes are considered with respect to any planned and implemented supportive measures.

The College will maintain the confidentiality of the supportive measures, provided that confidentiality does not impair the College's ability to provide those supportive measures. The College will act to ensure as minimal an academic/occupational impact on the Parties as possible. The College will implement measures in a way that does not unreasonably burden any party.

These actions may include, but are not limited to:

- Referral to counseling, medical, and/or other healthcare services
- Referral to the Employee Assistance Program
- Referral to community-based service providers
- Visa and immigration assistance
- Student financial aid counseling
- Education to the institutional community or community subgroup(s)
- Altering campus housing assignment(s)
- Altering work arrangements for employees or student-employees
- Safety planning
- Providing campus safety escorts
- Providing transportation assistance
- Implementing contact restrictions (no contact orders) between the parties
- Academic support, extensions of deadlines, or other course/program-related adjustments
- Trespass or Persona Non Grata (PNG) orders
- Timely warnings
- Class schedule modifications, withdrawals, or leaves of absence
- Increased security and monitoring of certain areas of the campus
- Any other actions deemed appropriate by the Coordinator

Violations of no contact orders or other restrictions may be referred to appropriate student or employee conduct processes for enforcement or added as collateral misconduct allegations to an ongoing Complaint under this Policy.

The Parties are provided with a timely opportunity to seek modification or reversal of the College's decision to provide, deny, modify, or terminate supportive measures applicable to them. A request to do so should be made in writing to the Coordinator. An impartial employee other than the employee who implemented the supportive measures, who has authority to modify or reverse the decision, will determine whether to provide, deny, modify, or terminate the supportive measures if they are inconsistent with the Title IX regulatory definition of supportive measures. The College will also provide the Parties with the opportunity to seek additional modification or termination of supportive measures applicable to them if circumstances materially change. The College typically renders decisions on supportive measures within seven (7) business days of receiving a request and provides a written determination to the impacted party(ies) and the Coordinator.

The College policies are written and interpreted broadly to include online manifestations of any of the behaviors prohibited below, when those behaviors occur in or have an effect on the College's education program and activities, or when they involve the use of the College networks, technology, or equipment.

Although the College may not control websites, social media, and other venues through which harassing communications are made, when such communications are reported to the College, it will engage in a variety of means to address and mitigate the effects. These means may include use of the Resolution Process to address off-campus conduct whose effects contribute to limiting or denying a person access to the College's Education Program or Activity.

Nothing in this Policy is intended to infringe upon or limit a person's rights to free speech. Online posting or other electronic communication by students are considered speech protected by principles of free expression, unless such on-line communication constitutes Prohibited Conduct as defined in Section 12 of this Policy. On-line communication that occurs completely outside of the College's control (e.g., not on the College networks, websites, or between the College email accounts), will only be subject to this Policy only when it causes (or will likely cause) a substantial in-program disruption or limits or denies a person's access to the College's Education Program or activities. Supportive measures will be provided to Complainants.

Off-campus harassing or discriminatory speech by employees, whether online or in person, may be regulated by the College only when such speech is made in an employee's official or work-related capacity or when such speech limits or denies a person's access to the College's Education Program or activities.

Inclusion Related to Gender Identity/Expression

The College strives to ensure that all individuals are safe, included, and respected in their education and employment environments, regardless of their gender identity or expression, including intersex, nonbinary, transgender, agender, two-spirit, and gender-diverse students and employees.

Discrimination and harassment on the basis of gender identity or expression are not tolerated by the College. If a member of the College community believes they have been subjected to discrimination under this Policy, they should follow the appropriate reporting process described herein.

In upholding the principles of equity and inclusion, the College supports the full integration and healthy development of those who are gender diverse and seeks to eliminate any stigma related to gender identity and expression.

The College is committed to fostering a climate where all identities are valued, contributing to a more vibrant and diverse community. The College will administratively address issues that some students and employees, including those identifying as intersex, transgender, agender, nonbinary, and gender diverse, may confront as they navigate systems originally designed around the assumption that gender is binary. As our society's understanding of gender evolves, so do the College's processes and policies.

Concepts like misgendering and deadnaming may not be familiar to all but understanding them is essential to the College's goal of being as welcoming and inclusive a community as possible.

Misgendering or mispronouncing is the intentional or unintentional use of pronouns or identifiers that are different from those used by an individual. Unintentional misgendering is usually resolved with a simple apology if someone clarifies their pronouns for you. Intentional misgendering is inconsistent with the type of community we hold ourselves out to be and may constitute a Policy violation if the effect is greater than de minimis harm. We each have a right to determine our own gender identity and expression, but we don't get to choose or negate someone else's.

Deadnaming, along with misgendering, can be very traumatic to a person who is transgender, transitioning, nonbinary, or gender diverse. Deadnaming means using someone's birth-assigned (cisgender) name, rather than the name they have chosen.

To a person who is transgender, transitioning, nonbinary, or gender diverse, their cisgender identity may be something that is in their past — dead, buried, and behind them. To then revive their deadname could trigger issues, traumas, and experiences of the past that the individual has moved past, or is moving past, and can interfere with their health and well-being.

Again, unintentional deadnaming can often be addressed by a simple apology and an effort to use the person's chosen name. Intentional deadnaming could be a form of bullying, outing, or otherwise harassing an individual, and thus should be avoided.

This Policy should be interpreted consistent with the goals of maximizing the inclusion of intersex, transgender, transitioning, agender, nonbinary, and gender-diverse students and employees, including:

Maintaining the privacy of all individuals consistent with law

Ensuring all students have equal access to educational programming, activities, and facilities, including restrooms and locker rooms

Ensuring all employees have equal access to employment opportunities and work, service, or health-related facilities

Providing professional development for employees and education for students on topics related to gender inclusion

Encouraging all students and employees to respect the pronoun usage and identities of all members of the College community

The College uses a number of interventions to address concerns that are raised related to gender-based harassment or discrimination, including problem-solving, intervention, confrontation, investigation, and Policy enforcement. When conflicts arise between the right of members of the community to be free from gender-identity discrimination and those exercising their right to religious freedom, the College will try to balance rights and interests to find mutually agreeable outcomes or compromises. When that is not possible, the College will offer remedial solutions or enforce its Policies while also respecting the rights of all members of its community.

Prohibited Conduct

Students and employees are entitled to an educational and employment environment that is free of discrimination, harassment, and retaliation. This Policy is not meant to inhibit or prohibit educational content or discussions inside or outside of the classroom that include germane, but controversial or sensitive, subject matters protected by academic freedom.

The sections below describe the specific forms of legally prohibited discrimination, harassment, and retaliation that are also prohibited under the College Policy. When speech or conduct is protected by academic freedom and/or principles of free expression, it will not be considered a violation of the College Policy, though supportive measures will be offered to those impacted.

All offense definitions below encompass actual and/or attempted offenses.

Any of the following offenses can be charged as or combined as pattern offenses, in which case the Notice of Investigation and Allegation (“NOIA”) will clearly indicate that both individual incidents and a pattern of conduct are being investigated. A pattern may exist and be charged when there is a potential substantial similarity to incidents where the proof of one could make it more likely that the other(s) occurred, and vice-versa. Patterns may exist based on target selection, similarity of offense, or other factors. Where a pattern is found, it can be the basis to enhance sanctions, accordingly.

Violation of any other College policies may constitute discrimination or harassment when motivated by actual or perceived protected characteristic(s), and the result is a limitation or denial of employment or educational access, benefits, or opportunities.

Discrimination

Discrimination is different treatment with respect to a person’s employment or participation in an Education Program or Activity based, in whole or in part, upon the person’s actual or perceived protected characteristic. Discrimination also includes allegations of a failure to provide reasonable accommodations as required by law or policy, such as for disability, religion, or creed.

Discrimination can take two primary forms:

Disparate Treatment Discrimination:

Any intentional differential treatment of a person or persons that is based on a person’s actual or perceived protected characteristic and that:

Excludes a person from participation in;

Denies the person benefits of; or

Otherwise adversely affects a term or condition of a person’s participation in the College program or activity.

Disparate Impact Discrimination:

Disparate impact occurs when policies or practices that appear to be neutral unintentionally result in a disproportionate impact on a protected group or person that:

Excludes an individual from participation in;

Denies the individual benefits of; or
Otherwise adversely affects a term or condition of an individual's participation in the College program or activity.

Discriminatory Harassment

unwelcome conduct on the basis of actual or perceived protected characteristic(s), that based on the totality of the circumstances, is subjectively and objectively offensive, and is so severe or pervasive, that it limits or denies a person's ability to participate in or benefit from the College's Education Program or Activity

Sex-based Harassment (Applicable under Title IX, Title VII, and the Fair Housing Act)

Sex-based Harassment is a form of sex discrimination and means sexual harassment and other harassment on the basis of sex, including sex stereotypes, sex characteristics, pregnancy or related conditions, sexual orientation, and gender identity; sexual assault, dating violence, domestic violence, and stalking.

Quid Pro Quo:

an employee agent, or other person authorized by the College, to provide an aid, benefit, or service under the College's Education Program or Activity, explicitly or impliedly conditioning the provision of such aid, benefit, or service, on a person's participation in unwelcome sexual conduct.

Hostile Environment Harassment:

unwelcome sex-based conduct, that based on the totality of the circumstances, is subjectively and objectively offensive, and is so severe or pervasive, that it limits or denies a person's ability to participate in or benefit from the College's Education Program or Activity

The College reserves the right to address offensive conduct and/or harassment that (1) does not rise to the level of creating a hostile environment, or (2) that is of a generic nature and not based on a protected characteristic. Addressing such conduct will not result in the imposition of discipline under this Policy, but may be addressed through respectful conversation, remedial actions, education, effective Alternative Resolution and/or other Informal Resolution mechanisms (as defined in the Resolution Process part of this Policy, Section 35.A.).

For assistance with Alternative Resolution and other Informal Resolution techniques and approaches, contact the Coordinator.

Sexual Assault:

Rape:

Penetration, no matter how slight,
of the vagina or anus of the Complainant,
with any body part of the Respondent or by Respondent's use of an object, or
oral penetration of the Complainant by a sex organ of Respondent,
without the consent of the Complainant.

Fondling:

The touching of the private body parts of the Complainant (buttocks, groin, breasts),
by the Respondent for the purpose of sexual gratification,
without the consent of the Complainant,
including instances where the Complainant is incapable of giving consent because of their age or
because of a temporary or permanent mental incapacity.

Incest:

Sexual intercourse,
between persons who are related to each other,
within the degrees wherein marriage is prohibited by CT law.

Statutory Rape:

Sexual intercourse,
with a person who is under the statutory age of consent of 18.

Dating Violence, defined as:

violence,
on the basis of sex,
committed by a person,
who is in or has been in a social relationship of a romantic or intimate nature with the Complainant.
The existence of such a relationship shall be determined based on the Complainant's statement and with
consideration of the length of the relationship, the type of relationship, and the frequency of interaction
between the persons involved in the relationship. For the purposes of this definition—
Dating violence includes, but is not limited to, sexual or physical abuse or the threat of such abuse.
Dating violence does not include acts covered under the definition of domestic violence.

Domestic Violence, defined as:

violence,
on the basis of sex,
committed by a current or former spouse or intimate partner of the Complainant,
by a person with whom the Complainant shares a child in common, or
by a person who is cohabitating with, or has cohabitated with, the Complainant as a spouse or intimate
partner, or
by a person similarly situated to a spouse of the Complainant under the domestic or family violence laws
of CT, or
by any other person against an adult or youth Complainant who is protected from that person's acts
under the domestic or family violence laws of CT.

Stalking, defined as:

engaging in a course of conduct,
on the basis of sex,
directed at the Complainant, that
would cause a reasonable person to fear for the person's safety, or
the safety of others; or
suffer substantial emotional distress.

For the purposes of this definition—

Course of conduct means two or more acts, including, but not limited to, acts in which the Respondent directly, indirectly, or through third parties, by any action, method, device, or means, follows, monitors, observes, surveils, threatens, or communicates to or about a person, or interferes with a person's property.

Reasonable person means a reasonable person under similar circumstances and with similar identities to the Complainant.

Substantial emotional distress means significant mental suffering or anguish that may but does not necessarily require medical or other professional treatment or counseling.

Other Sexual Misconduct

Sexual Exploitation:

A person taking non-consensual or abusive sexual advantage of another, that does not constitute Sex-based Harassment as defined above,
for their own benefit or for the benefit of anyone other than the person being exploited.

Examples of Sexual Exploitation include, but are not limited to:

Sexual voyeurism (such as observing or allowing others to observe a person undressing or using the bathroom or engaging in sexual acts, without the consent of the person being observed)

Invasion of sexual privacy (e.g., doxxing)

Knowingly making an unwelcome disclosure of (or threatening to disclose) a person's sexual orientation, gender identity, or gender expression

Taking pictures, video, or audio recording of another person in a sexual act, or in any other sexually related activity when there is a reasonable expectation of privacy during the activity, without the consent of all involved in the activity; or exceeding the boundaries of consent (such as allowing another person to hide in a closet and observe sexual activity, or disseminating sexual pictures without the photographed person's consent), including the making or posting of non-consensual pornography

Prostituting another person

Engaging in sexual activity with another person while knowingly infected with human immunodeficiency virus (HIV) or a sexually transmitted disease (STD) or infection (STI), without informing the other person of the virus, disease, or infection

Causing or attempting to cause the incapacitation of another person (through alcohol, drugs, or any other means) for the purpose of compromising that person's ability to give consent to sexual activity, or for the purpose of making that person vulnerable to non-consensual sexual activity

Misappropriation of another person's identity on apps, websites, or other venues designed for dating or sexual connections (e.g., spoofing)

Forcing a person to take an action against that person's will by threatening to show, post, or share information, video, audio, or an image that depicts the person's nudity or sexual activity

Knowingly soliciting a minor for sexual activity

Engaging in sex trafficking

Knowingly creating, possessing, or disseminating child sexual abuse images or recordings

Creating or disseminating synthetic media, including images, videos, or audio representations of individuals doing or saying sexually-related things that never happened, or placing identifiable real people in fictitious pornographic or nude situations without their consent (i.e., Deepfakes)

Other Prohibited Conduct

Retaliation:

Adverse action, including intimidation, threats, coercion, or discrimination,

against any person,

by the College, a student, employee, or a person authorized by the College to provide aid, benefit, or service under the College's Education Program or Activity,

for the purpose of interfering with any right or privilege secured by law or this Policy, or

because the person has engaged in protected activity, including reporting information, making a

Complaint, testifying, assisting, or participating or refusing to participate in any manner in an

investigation or Resolution Process under this Policy, including an Informal Resolution process, or in

any other appropriate steps taken by the College to promptly and effectively end any sex discrimination in its Education Program or Activity, prevent its recurrence, and remedy its effects.

The exercise of rights protected under principles of free expression does not constitute retaliation. It is also not retaliation for the College to pursue Policy violations against those who make materially false statements in bad faith in the course of a resolution under this Policy. However, the determination of responsibility, by itself, is not sufficient to conclude that any party has made a materially false statement in bad faith.

Unauthorized Disclosure:

Distributing or otherwise publicizing materials created or produced during an investigation or Resolution Process except as required by law or as expressly permitted by the College; or

publicly disclosing information received from the College that contains personally identifiable information without authorization or consent.

Failure to Comply/Process Interference

Intentional failure to comply with the reasonable directives of the Coordinator in the performance of their official duties, including with the terms of a no contact order

Intentional failure to comply with emergency removal or interim suspension terms

Intentional failure to comply with sanctions

Intentional failure to adhere to the terms of an Informal Resolution agreement

Intentional failure to comply with mandated reporting duties as defined in this Policy

Intentional interference with the Resolution Process, including but not limited to:

Destruction of or concealing of evidence

Actual or attempted solicitation of knowingly false testimony or providing false testimony or evidence

Intimidating or bribing a witness or party

Sanction Ranges

The following are the sanction ranges that typically apply to categories of Prohibited Conduct under this Policy. Sanctions can be assigned outside of the specified ranges based on aggravating or mitigating circumstances and/or the Respondent's cumulative conduct record.

Discrimination: warning through expulsion or termination.
Discriminatory Harassment: warning through expulsion or termination.
Quid Pro Quo Harassment: warning through expulsion or termination.
Hostile Environment Harassment: warning through expulsion or termination.
Rape: suspension through expulsion or termination.
Fondling: warning through expulsion or termination
Incest: warning through expulsion or termination.
Statutory Rape: warning through expulsion or termination.
Stalking: probation through expulsion or termination.
Dating/Domestic Violence: probation through expulsion or termination.
Sexual Exploitation: warning through expulsion or termination.
Bullying: warning through expulsion or termination.
Endangerment: warning through expulsion or termination.
Hazing: warning through expulsion or termination.
Retaliation: warning through expulsion or termination.
Unauthorized Disclosure: warning through expulsion or termination.
Failure to Comply/Process Interference: warning through expulsion or termination.

Consent, Force, and Incapacitation

As used in this Policy, the following definitions and understandings apply:

Consent

Consent is defined as:

knowing, and
voluntary, and
clear permission
by word or action
to engage in sexual activity.

Individuals may perceive and experience the same interaction in different ways. Therefore, it is the responsibility of each party to determine that the other has consented before engaging in the activity.

If consent is not clearly provided prior to engaging in the activity, consent may be ratified by word or action at some point during the interaction or thereafter, but clear communication from the outset is strongly encouraged.

For consent to be valid, there must be a clear expression in words or actions that the other individual consented to that specific sexual conduct. Consent is evaluated from the perspective of what a reasonable person would conclude are mutually understandable words or actions. Reasonable

reciprocation can establish consent. For example, if someone kisses you, you can kiss them back (if you want to) without the need to explicitly obtain their consent to be kissed back.

Consent can also be withdrawn once given, as long as the withdrawal is reasonably and clearly communicated. If consent is withdrawn, sexual activity should cease within a reasonably immediate time.

Silence or the absence of resistance alone should not be interpreted as consent. Consent is not demonstrated by the absence of resistance. While resistance is not required or necessary, it is a clear demonstration of non-consent.

Consent to some sexual contact (such as kissing or fondling) cannot be assumed to be consent for other sexual activity (such as intercourse). A current or previous intimate relationship is not sufficient to constitute consent. If an individual expresses conditions on their willingness to consent (e.g., use of a condom) or limitations on the scope of their consent, those conditions and limitations must be respected. If a sexual partner shares the clear expectation for the use of a condom, or to avoid internal ejaculation, and those expectations are not honored, the failure to use a condom, removing a condom, or internal ejaculation can be considered acts of sexual assault.

Proof of consent or non-consent is not a burden placed on either party involved in a Complaint. Instead, the burden remains on the College to determine whether its Policy has been violated. The existence of consent is based on the totality of the circumstances evaluated from the perspective of a reasonable person in the same or similar circumstances, including the context in which the alleged misconduct occurred and any similar and previous patterns that may be evidenced.

Going beyond the boundaries of consent is prohibited. Thus, unless a sexual partner has consented to slapping, hitting, hair pulling, strangulation, or other physical roughness during otherwise consensual sex, those acts may constitute dating violence and/or sexual assault.

Force

Force is the use of physical violence and/or physical imposition to gain sexual access. Sexual activity that is forced is, by definition, non-consensual, but non-consensual sexual activity is not necessarily forced. Force is conduct that, if sufficiently severe, can negate consent.

Force also includes threats, intimidation (implied threats), and coercion that is intended to overcome resistance or produce consent (e.g., “Have sex with me or I’ll hit you,” which elicits the response, “Okay, don’t hit me. I’ll do what you want.”).

Coercion is unreasonable pressure for sexual activity. Coercive conduct, if sufficiently severe, can render a person’s consent ineffective, because it is not voluntary. When someone makes clear that they do not want to engage in sexual activity, that they want to stop, or that they do not want to go past a certain point of sexual interaction, continued pressure beyond that point can be coercive. Coercion is evaluated based on the frequency, intensity, isolation, and duration of the pressure involved.

Incapacitation

Incapacitation is a state where a person is incapable of giving consent. An incapacitated person cannot make rational, reasonable decisions because they lack the capacity to give knowing/informed consent (e.g., to understand the “who, what, when, where, why, and how” of their sexual interaction). A person cannot consent if they are unable to understand what is happening or are disoriented, helpless, asleep, or unconscious for any reason, including because of alcohol or other drug consumption.

This Policy also covers a person whose incapacity results from a temporary or permanent physical or mental health condition, involuntary physical restraint, and/or the consumption of incapacitating substances.

Incapacitation is determined through consideration of all relevant indicators of a person’s state and is not synonymous with intoxication, impairment, blackout, and/or being drunk.

If the Respondent neither knew nor should have known the Complainant to be physically or mentally incapacitated, the Respondent is not in violation of this Policy. “Should have known” is an objective, reasonable person standard that assumes that a reasonable person is both sober and exercising sound judgment.

Connecticut State Required Disclosure Regarding Affirmative Consent

Consent under this Policy is intended to be consistent with the requirements of Conn. Gen. Stat. § 10a-55m, which provides that, in the context of an alleged violation of the policy or policies regarding sexual assault and intimate partner violence,

(A) affirmative consent is the standard used in determining whether consent to engage in sexual activity was given by all persons who engaged in the sexual activity,

(B) affirmative consent may be revoked at any time during the sexual activity by any person engaged in the sexual activity,

(C) it is the responsibility of each person to ensure that he or she has the affirmative consent of all persons engaged in the sexual activity to engage in the sexual activity and that the affirmative consent is sustained throughout the sexual activity,

(D) it shall not be a valid excuse to an alleged lack of affirmative consent that the student or employee responding to the alleged violation believed that the student or employee reporting or disclosing the alleged violation consented to the sexual activity

(i) because the responding student or employee was intoxicated or reckless or failed to take reasonable steps to ascertain whether the student or employee reporting or disclosing the alleged violation affirmatively consented, or

(ii) if the responding student or employee knew or should have known that the student or employee reporting or disclosing the alleged violation was unable to consent because such student or employee was unconscious, asleep, unable to communicate due to a mental or physical condition, or incapacitated due to the influence of drugs, alcohol or medication, and

(E) the existence of a past or current dating or sexual relationship between the student or employee reporting or disclosing the alleged violation and the responding student or employee, in and of itself, shall not be determinative of a finding of affirmative consent.

Unethical Relationships (See Appendix C)

Standard of Proof

The College uses the preponderance of the evidence standard of proof when determining whether a Policy violation occurred. This means that the College will decide whether it is more likely than not, based upon the available information at the time of the decision, that the Respondent has violated the Policy.

Reports/Complaints of Discrimination, Harassment, and/or Retaliation

A report provides notice to the College of an allegation or concern about discrimination, harassment, or retaliation and provides an opportunity for the Coordinator to provide information, resources, and supportive measures. A Complaint provides notice to the College that the Complainant would like to initiate an investigation or other appropriate resolution procedures. A Complainant or individual may initially make a report and may decide at a later time to make a Complaint. Reports or Complaints of discrimination, harassment, and/or retaliation may be made using any of the following options:

File a Complaint with, or give verbal Notice directly to, the Coordinator or to any member of the Nondiscrimination Team. Such a Complaint may be made at any time (including during non-business hours) by using the telephone number, email address, or by mail to the office of the Coordinator or any other Nondiscrimination Team member listed in this Policy:

Submit online Notice at this online reporting form. Anonymous Notice is accepted, but the Notice may give rise to a need to try to determine the Parties' identities. Anonymous Notice typically limits the College's ability to investigate, respond, and provide remedies, depending on what information is shared. . It also may not be possible to provide supportive measures to Complainants who are the subject of anonymous Notice. The College may take measures intended to protect the community or redress or mitigate harm.

Reporting carries no obligation to initiate a Complaint, and in most situations, the College is able to respect a Complainant's request to not initiate a resolution process. However, there may be circumstances, such as pattern behavior, allegations of severe misconduct, or a compelling threat to health and/or safety, where the College may need to initiate a resolution process. If a Complainant does not wish to file a Complaint, the College will maintain the privacy of information provided by the Complainant to the extent possible. The Complainant should not fear a loss of confidentiality by giving Notice that allows the College to discuss and/or provide supportive measures, in most circumstances.

Time Limits on Reporting

There is no time limit on providing Notice/Complaints to the Coordinator. However, if the Respondent is no longer subject to the College's jurisdiction and/or significant time has passed, the ability to investigate, respond, and/or provide remedies may be more limited or impossible.

Acting on Notice/Complaints significantly impacted by the passage of time (including, but not limited to, the rescission or revision of Policy) is at the Coordinator's discretion; they may document allegations for future reference, offer supportive measures and/or remedies, and/or engage in informal or formal action, as appropriate.

False Allegations and Evidence

Deliberately false and/or malicious accusations under this Policy are a serious offense and will be subject to appropriate disciplinary action under this Policy or other College policies. This does not include allegations that are made in good faith but are ultimately shown to be erroneous or do not result in a determination of a Policy violation.

Additionally, witnesses and Parties who knowingly provide false evidence, tamper with or destroy evidence, or deliberately mislead an official conducting an investigation or resolution process can be subject to discipline under this Policy or other College policies.

Confidentiality/Privacy

The College makes every effort to preserve the Parties' privacy. The College will not share the identity of: any individual who has made a Complaint of discrimination, harassment, or retaliation; any Complainant; any individual who has been reported to be the perpetrator of discrimination, harassment, or retaliation; any Respondent; or any witness, except as permitted by, or to fulfill the purposes, of applicable laws and regulations (e.g., Title IX), Family Educational Rights and Privacy Act (FERPA) and its implementing regulations, or as required by law; including any investigation, or resolution proceeding arising under this Policy.,

Unauthorized Disclosure of Information

Parties and Advisors are prohibited from disclosing information obtained by the College through the Resolution Process, to the extent that information is the work product of the College (meaning it has been produced, compiled, or written by the College for purposes of its investigation and resolution of a Complaint), without authorization. It is also a violation of College Policy to publicly disclose institutional work product that contains a party or witness's personally identifiable information without authorization or consent. Such unauthorized disclosures are subject to significant sanctions.

Emergency Removal/Interim Actions/Leaves

The College can act to remove a student Respondent accused of Sex Discrimination or Sex-based Harassment from its Education Program or activities, partially or entirely, on an emergency basis when an individualized safety and risk analysis has determined that an imminent and serious threat to the health or safety of any student or other individual justifies removal. This risk analysis is performed by the Coordinator and may be done in conjunction with the Care Team using its standard objective violence risk assessment procedures. Employees are subject to existing procedures for interim actions and leaves. See Sections 31 and 32 of this Policy, and Appendix B concerning the violence risk assessment process. Further information about the care Team can be found at this webpage.

Federal Timely Warning Obligations

The College must issue timely warnings for reported incidents that pose a serious or continuing threat of bodily harm or danger to members of the College community.

The College will ensure that a Complainant's name and other identifying information is not disclosed, while still providing enough information for community members to make safety decisions in light of the potential danger.

Amnesty

The College community encourages the reporting of misconduct and crimes by Complainants and witnesses. Sometimes, Complainants or witnesses are hesitant to give Notice to the College officials or participate in resolution processes because they fear that they themselves may be in violation of certain policies, such as underage drinking or use of illicit drugs at the time of the incident. Respondents may hesitate to be forthcoming during the process for the same reasons.

It is in the best interests of the College community that Complainants choose to give Notice of misconduct to the College officials, that witnesses come forward to share what they know, and that all Parties be forthcoming during the process.

To encourage reporting and participation in the process, the College offers Parties and witnesses amnesty from minor policy violations, such as underage alcohol consumption or the use of illicit drugs, related to the incident. Granting amnesty is a discretionary decision made by the College, and amnesty does not apply to more serious allegations, such as physical abuse of another or illicit drug distribution. The College also maintains an amnesty policy for students and witnesses who offer help to others in need.

Sometimes, employees are hesitant to report discrimination, harassment, or retaliation they have experienced for fear of getting in trouble themselves. The College may, at its discretion, offer employee Complainants amnesty from minor policy violations related to the incident.

Preservation of Evidence

The preservation of evidence is critical to potential criminal prosecution and to obtaining restraining/protective orders, and it is particularly time sensitive. The College will inform the Complainant of the importance of preserving evidence by taking actions such as the following:

Sexual Assault

Seek forensic medical assistance at the nearest hospital, ideally within 120 hours of the incident (sooner is better).

Avoid urinating, showering, bathing, washing hands or face, or douching, if possible, but evidence may still be collected even if you do.

If oral sexual contact took place, refrain from smoking, eating, drinking, or brushing teeth.

If clothes are changed, place soiled clothes in a paper bag (plastic destroys evidence) or a secure evidence container (if provided one by law enforcement)

Seeking medical treatment can be essential, even if it is not for the purposes of collecting forensic evidence.

Stalking/Dating Violence/Domestic Violence/Sex-Based Harassment

Evidence in the form of text and voice messages will be lost in most cases if the Complainant changes their phone number.

Make a secondary recording of any voice messages and/or save the audio files to a cloud server.

Take screenshots and/or a video recording of any text messages or other electronic messages (e.g., Instagram, Snapchat, Facebook).

Save copies of email and social media correspondence, including notifications related to account access alerts.

Take timestamped photographs of any physical evidence, including notes, gifts, etc., in place when possible.

Save copies of any messages, including those showing any request for no further contact.

Obtain copies of call logs showing the specific phone number being used rather than a saved contact name if possible.

During the initial meeting between the Complainant and Coordinator, the importance of taking these actions will be discussed, if timely.

Federal Statistical Reporting Obligations

Certain institutional officials (those deemed Campus Security Authorities) have a duty to report the following for federal statistical reporting purposes under the Clery Act:

All “primary crimes,” which include criminal homicide, sexual assault, robbery, aggravated assault, burglary, motor vehicle theft, and arson

Hate crimes, which include any bias-motivated primary crime as well as any bias-motivated larceny or theft, simple assault, intimidation, or destruction/damage/vandalism of property

Violence Against Women Act (VAWA-based crimes), which include sexual assault, domestic violence, dating violence, and stalking

Arrests and referrals for disciplinary action for weapons law violations, liquor law violations, and drug law violations

All personally identifiable information is kept private, but statistical information regarding the type of incident and its general location (on- or off-campus or in the surrounding area, but no addresses are given) must be shared with Clery Act Coordinator, the Assistant Director of Campus Safety, for publication in the Annual Security Report and daily campus crime log. Campus Security Authorities include student affairs/student conduct staff, campus law enforcement/public safety/security, local police, coaches, athletic directors, residence life staff, student activities staff, human resources staff, advisors to student organizations, and any other official with significant responsibility for student and campus activities.

Independence and Conflicts of Interest

The Coordinator manages the Nondiscrimination Team and acts with independence and authority, free from bias and conflicts of interest. The Coordinator oversees all resolutions under this Policy and these procedures. The members of the resolution team are vetted and trained to ensure they are not biased for or against any party in a specific Complaint, or for or against Complainants and/or Respondents, generally.

To raise any concern involving bias, conflict of interest, misconduct, or discrimination by the Coordinator, contact the College Dean of Equity and Inclusion. Concerns of bias, misconduct, discrimination, or a potential conflict of interest by any other resolution pool member should be raised with the Coordinator.

Revision of this Policy

This Policy succeeds previous policies addressing discrimination, harassment, sexual misconduct, and/or retaliation, though previous policies and procedures remain in force for incidents occurring before August 1, 2024. The Coordinator reviews and updates these policies and procedures regularly. The College reserves the right to make changes to this document as necessary, and once those changes are posted online, they are in effect.

If government laws or regulations change or court decisions alter the requirements in a way that impacts this document, this document will be construed to comply with the most recent government laws, regulations, or court holdings.

This document does not create legally enforceable protections beyond the protections of the background state and federal laws that frame such policies and codes, generally.

This Policy is effective 08-01-2024.

RESOLUTION PROCESS FOR ALLEGED VIOLATIONS OF EQUAL OPPORTUNITY, HARASSMENT, AND NONDISCRIMINATION POLICY (Hereinafter the “Resolution Process”) Overview

The College will act on any Notice, Complaint, or Knowledge of a potential violation of this Policy that the Coordinator or any other Mandated Reporter receives by applying the Resolution Process below.

The procedures below apply to all allegations of discrimination on the basis of actual or perceived protected characteristics, harassment, retaliation, or Other Prohibited Conduct involving students, employees, or third parties. Unionized/other categorized employees are subject to the terms of their agreements/employees’ rights to the extent those agreements do not conflict with federal or state compliance obligations.

Notice/Complaint

Upon receipt of Notice, a Complaint, or Knowledge of an alleged Policy violation, the Coordinator will initiate a prompt initial evaluation to determine the College's next steps. The Coordinator will contact the Complainant/source of the Notice to offer supportive measures, provide information regarding resolution options, and determine how they wish to proceed.

Collateral Misconduct

Collateral misconduct is defined to include potential violations of other the College policies not incorporated into the Policy that occur in conjunction with alleged violations of the Policy, or that arise through the course of the investigation, for which it makes sense to provide one resolution for all allegations. Thus, the collateral allegations may be charged along with potential violations of the Policy, to be resolved jointly under these Procedures. In such circumstances, the Coordinator may consult with the College officials who typically oversee such conduct (e.g., human resources, student conduct, academic affairs) to solicit their input as needed on what charges should be filed, but the exercise of collateral charges under these procedures is within the discretion of the Coordinator. All other allegations of misconduct unrelated to incidents covered by the Policy will typically be addressed separately through procedures described in the Student Handbook, Information for Faculty (IFF), Employee Handbook, and/or collective bargaining agreement.

Initial Evaluation

The Coordinator conducts an initial evaluation typically within seven (7) business days of receiving Notice/Complaint/Knowledge of alleged misconduct. The initial evaluation typically includes:

- Assessing whether the reported conduct may reasonably constitute a violation of the Policy. If the conduct may not reasonably constitute a violation of the Policy, the matter is typically dismissed from the Resolution Process, consistent with the dismissal provision in these procedures. It may then be referred to another process, if applicable.
- Determining whether the College has jurisdiction over the reported conduct, as defined in the Policy. If the conduct is not within the College jurisdiction, the matter is typically dismissed from the Resolution Process, consistent with the dismissal provision in these procedures. If applicable, the conduct will be referred to the appropriate College office for resolution.
- Offering and coordinating supportive measures for the Complainant.
- Offering and coordinating supportive measures for the Respondent, as applicable.
- Notifying the Complainant, or the person who reported the allegation(s), of the available resolution options, including a supportive and remedial response, an Informal Resolution option, or the Administrative Resolution Process described below.
- Determining whether the Complainant wishes to initiate a Complaint.
- Notifying the Respondent of the available resolution options, including a supportive and remedial response, an Informal Resolution option, or the Administrative Resolution Process described below, if a Complaint is made.

Helping a Complainant to Understand Resolution Options

If the Complainant indicates they wish to initiate a Complaint (in a manner that can reasonably be construed as reflecting intent to make a Complaint), the Coordinator will help to facilitate the Complaint, which will include:

Working with the Complainant to determine whether the Complainant wishes to pursue one of three resolution options:

a supportive and remedial response, and/or

Informal Resolution, or

The Administrative Resolution Process described below.

The Coordinator will seek to abide by the wishes of the Complainant but may have to take an alternative approach depending on their analysis of the situation.

If the Complainant elects the Administrative Resolution Process below, and the Coordinator has determined the Policy applies and that the College has jurisdiction, they will route the matter to the appropriate resolution team member, will provide the Parties with a Notice of Investigation and Allegation(s) (a “NOIA”), and will initiate an investigation consistent with these Procedures.

If any Party indicates (either verbally or in writing) that they want to pursue an Informal Resolution option, the Coordinator will assess whether the matter is suitable for Informal Resolution and refer the matter accordingly.

If the Complainant indicates (either verbally or in writing) that they do not want any action taken, no Resolution Process will be initiated (unless deemed necessary by the Coordinator), though the Complainant can elect to initiate one later, if desired.

Coordinator Authority to Initiate a Complaint

If the Complainant does not wish to file a Complaint, the Coordinator, who has ultimate discretion as to whether a Complaint is initiated, will offer supportive measures and determine whether to initiate a Complaint themselves. To make this determination, the Coordinator will evaluate that request to determine if there is a serious and imminent threat to someone's safety or if the College cannot ensure equal access without initiating a Complaint. The Coordinator will consider the following non-exhaustive factors to determine whether to file a Complaint:

The Complainant’s request not to initiate a Complaint.

The Complainant’s reasonable safety concerns regarding initiating a Complaint.

The risk that additional acts of discrimination would occur if a Complaint is not initiated.

The severity of the alleged discrimination, including whether the discrimination, if established, would require the removal of a Respondent from campus or imposition of another disciplinary sanction to end the discrimination and prevent its recurrence.

The age and relationship of the Parties, including whether the Respondent is a College employee.

The scope of the alleged discrimination, including information suggesting a pattern, ongoing discrimination, or discrimination alleged to have impacted multiple individuals.

The availability of evidence to assist a Decision-maker in determining whether discrimination occurred.

Whether the College could end the alleged discrimination and prevent its recurrence without initiating a Complaint.

The Coordinator may consult with appropriate College employees, and/or conduct a violence risk assessment to aid their determination whether to initiate a Complaint.

When the Coordinator initiates a Complaint, they do not become the Complainant. The Complainant is the person who experienced the alleged conduct that could constitute a violation of this Policy.

Dismissal

The College may dismiss a Complaint if, at any time during the investigation or Resolution Process, one or more of the following grounds are met:

The College is unable to identify the Respondent after taking reasonable steps to do so

The College no longer enrolls or employs the Respondent

A Complainant voluntarily withdraws any or all of the allegations in the Complaint, and the Coordinator declines to initiate a Complaint

The College determines the conduct alleged in the Complaint would not constitute a Policy violation, if proven

In addition to the other members of the Nondiscrimination Team, as authorized by the Coordinator, a Decision-maker can recommend dismissal to the Coordinator if they believe the above grounds are met. A Complainant who decides to withdraw a Complaint may later request to reinstate or refile it.

Upon any dismissal, the College will promptly send the Complainant written notification of the dismissal and the rationale for doing so. If the dismissal occurs after the Respondent has been made aware of the allegations, the College will also notify the Respondent of the dismissal.

This dismissal decision is appealable by any Party.

Appeal of Dismissal

The Complainant may appeal a dismissal of their Complaint. The Respondent may also appeal the dismissal of the Complaint if dismissal occurs after the Respondent has been made aware of the allegations. All dismissal appeal requests must be filed within three (3) business days of the notification of the dismissal.

The Coordinator will notify the Parties of any appeal of the dismissal. If, however, the Complainant appeals, but the Respondent was not notified of the Complaint, the Coordinator must then provide the Respondent with a NOIA and will notify the Respondent of the Complainant's appeal with an opportunity to respond.

As part of the dismissal appeal process, the College will:

Implement dismissal appeal procedures equally for the Parties.

Assign a trained dismissal appeal officer who did not take part in an investigation of the allegations or dismissal of the Complaint.

Provide the Parties a reasonable and equal opportunity to make a statement in support of, or challenging, the dismissal.

Notify the Parties of the result of the appeal and the rationale for the result.

The grounds for dismissal appeals are limited to:

Procedural irregularity that would change the outcome.

New evidence that would change the outcome and that was not reasonably available when the dismissal was decided.

The Coordinator, Investigator, or Decision-maker had a conflict of interest or bias for or against complainants or respondents generally or the individual Complainant or Respondent that would change the outcome

The dismissal was erroneously granted or denied

The appeal should specify at least one of the grounds above and provide any reasons or supporting evidence for why the ground is met. Upon receipt of a written dismissal appeal request from one or more Parties, the Coordinator will share the petition with all other Parties and provide three (3) business days for other Parties and the Coordinator to respond to the request. At the conclusion of the response period, the Coordinator will forward the appeal, as well as any response provided by the other Parties and/or the Coordinator to the Dismissal Appeal Officer for consideration.

If the Request for Appeal does not provide information that meets the grounds in this Policy, the Dismissal Appeal Officer will deny the request, and the Parties, their Advisors, and the Coordinator will be notified in writing of the denial and the rationale.

If any of the asserted grounds in the appeal satisfy the grounds described in this Policy, then the Dismissal Appeal Officer will notify all Parties and their Advisors, and the Coordinator, of their decision and rationale in writing. The effect will be to reinstate the Complaint.

In most circumstances, appeals are confined to a review of the written documentation or record of the original determination and pertinent documentation regarding the specific appeal grounds. The Dismissal Appeal Officer has seven (7) business days to review and decide on the appeal, though extensions can be granted at the discretion of the Coordinator, and the Parties will be notified of any extension.

Appeal decisions are deferential to the original determination, making changes only if there is a compelling justification to do so.

The Dismissal Appeal Officer may consult with the Coordinator and/or legal counsel on questions of procedure or rationale for clarification, if needed. The Coordinator will maintain documentation of all such consultation.

Emergency Removal/Interim Suspension of a Student

The College may emergently remove a student accused of Sex Discrimination or Sex-based Harassment upon receipt of Notice/Knowledge, a Complaint, or at any time during the Resolution Process. Prior to an emergency removal, the College will conduct an individualized risk assessment and may remove the student if that assessment determines that an imminent and serious threat to the health or safety of a Complainant or any students, employees, or other persons arising from the allegations of sex discrimination justifies such action. Students accused of other forms of discrimination (not sex) are subject to interim suspension, which can be imposed for safety reasons.

When an emergency removal or interim suspension is imposed, wholly or partially, the affected student will be notified of the action, which will include a written rationale, and the option to challenge the emergency removal or interim suspension within two (2) business days of the notification. Upon receipt of a challenge, the Coordinator will meet with the student (and their Advisor, if desired) as soon as reasonably possible thereafter to allow them to show cause why the removal/action should not be implemented or should be modified.

This meeting is not a hearing on the merits of the allegation(s), but rather is an administrative process intended to determine solely whether the emergency removal or interim suspension is appropriate, should be modified, or lifted. When this meeting is not requested within two (2) business days, objections to the emergency removal or interim suspension will be deemed waived. A student can later request a meeting to show why they are no longer an imminent and serious threat because conditions related to imminence or seriousness have changed. A Complainant and their Advisor may be permitted to participate in this meeting if the Coordinator determines it is equitable for them to do so.

The Respondent may provide information, including expert reports, witness statements, communications, or other documentation for consideration prior to or during the meeting. When applicable, a Complainant may provide information to the Coordinator for review.

An emergency removal or interim suspension may be affirmed, modified, or lifted as a result of a requested review or as new information becomes available. The Coordinator will communicate the final decision in writing, typically within three (3) business days of the review meeting. See Appendix B for further emergency removal information.

Placing an Employee on Leave

When the Respondent is an employee, or a student employee accused of misconduct in the course of their employment, existing procedures for interim action are typically applicable instead of the above emergency removal process, including but not limited to administrative leave pending investigation.

Counter-Complaints

The College is obligated to ensure that the Resolution Process is not abused for retaliatory purposes. Although the College permits the filing of counter-complaints, the Coordinator will conduct an initial evaluation using the procedures described in Section 28 above, and in doing so will assess whether the allegations in the counter-complaint is retaliatory. When counter-complaints allege conduct that would not constitute a violation of the Policy or are not within the jurisdiction of the Policy, or are retaliatory,

they will not be permitted. They will be considered potentially retaliatory and may constitute a violation of the Policy.

Counter-complaints determined to have been reported in good faith will be processed using the Resolution Process below. At the Coordinator's discretion, investigation of such claims may take place concurrently or after resolution of the underlying initial Complaint.

Advisors in the Resolution Process

Who Can Serve as an Advisor?

The Parties may each have an Advisor (friend, mentor, family member, attorney, or any other individual a party chooses) present with them for all meetings, interviews within the Resolution Process, including intake. The Parties may select whomever they wish to serve as their Advisor as long as the Advisor is eligible and available.

The Coordinator will offer to assign a trained Advisor to any party if the party chooses. If the Parties choose an Advisor from the pool available from the College, the College will have trained the Advisor and familiarized them with the College's Resolution Process.

The College cannot guarantee that Advisors will have comparable background and experience, e.g., if one party selects an Advisor who is an attorney, but the other party does not, or cannot afford an attorney, the College is not obligated to provide an attorney to advise that party.

A party may elect to change Advisors during the process and is not obligated to use the same Advisor throughout. Parties are expected to provide the Coordinator with timely notification if they change Advisors. If a party changes Advisors, consent to share information with the previous Advisor is assumed to be terminated, and a release for the new Advisor must be submitted.

The College may permit Parties to have more than one Advisor, or an Advisor and a support person, upon special request to the Coordinator. The decision to grant this request is at the Coordinator's sole discretion and will be granted equitably to all Parties.

If a party requests that all communication be made through their attorney Advisor instead of to the party, the College will agree to copy both the party and their Advisor on all communications.

Advisors appointed by the institution cannot be Confidential Employees, and although they will not be asked to disclose details of their interactions with their advisees to institutional officials or Decision-makers absent an emergency, they are still reminded of their Mandated Reporter responsibilities.

As a public entity, the College fully respects and accords the Weingarten rights of employees, meaning that for Parties who are entitled to union representation, the College will allow the unionized employee to have their union representative (if requested by the party) as well as an Advisor of their choice present for all resolution-related meetings and interviews. To uphold the principles of equity, the other party (regardless of union membership) will also be permitted to have two Advisors. Witnesses are not permitted to have union representation or Advisors in Resolution Process interviews or meetings.

Advisor's Role in the Resolution Process

Advisors should help the Parties to prepare for each meeting and are expected to advise ethically, with integrity, and in good faith. Advisors may not provide testimony or speak on behalf of their advisee unless given specific permission to do so.

The Parties are expected to ask and respond to questions on their own behalf throughout the Resolution Process. Although the Advisor generally may not speak on behalf of their advisee, the Advisor may consult with their advisee, either privately as needed, or by conferring or passing notes during any Resolution Process meeting or interview. For longer or more involved discussions, the Parties and their Advisors should ask for breaks to allow for private consultation.

Records Shared with Advisors

Advisors are entitled to the same opportunity as their advisee to access relevant evidence, and/or the same written investigation report that accurately summarizes this evidence.

Advisors are expected to maintain the confidentiality of the records the College shares with them, per Section 17 of the Policy addressing Confidentiality. Advisors may not disclose any of the College work product or evidence the College obtained solely through the Resolution Process for any purpose not explicitly authorized by the College.

Accordingly, Advisors will be asked to sign Non-Disclosure Agreements (NDAs). The College may decline to share materials with any Advisor who has not executed the NDA. The College may restrict the role of any Advisor who does not respect the sensitive nature of the process or who fails to abide by the College's confidentiality expectations or may require the party to use a different Advisor or provide a different College-appointed Advisor.

Advisor Expectations

The College generally expects an Advisor to adjust their schedule to allow them to attend the College meetings/interviews when planned, but the College may change scheduled meetings/interviews to accommodate an Advisor's inability to attend, if doing so does not cause an unreasonable delay.

The College may also make reasonable provisions to allow an Advisor who cannot be present in person to attend a meeting/interview by telephone, video conferencing, or other similar technologies.

All Advisors are subject to the same College policies and procedures, whether they are attorneys or not, and whether they are selected by a party or appointed by the College. Advisors are expected to advise without disrupting proceedings.

Advisor Policy Violations

Any Advisor who oversteps their role as defined by the Policy, who shares information or evidence in a manner inconsistent with the Policy, or who refuses to comply with the College's established rules of

decorum, will be warned. If the Advisor continues to disrupt or otherwise fails to respect the limits of the Advisor role, the meeting/interview may be ended, or other appropriate measures implemented, including the College requiring the party to use a different Advisor or providing a different College-appointed Advisor. Subsequently, the Coordinator will determine how to address the Advisor's non-compliance and future role.

Resolution Options Overview

This Resolution Process, consisting of Informal Resolution or Administrative Resolution, is the College's chosen approach to addressing all forms of discrimination on the basis of protected characteristics, harassment, retaliation, and Other Prohibited Conduct under the Policy. The process considers the Parties' preferences but is ultimately determined at the Coordinator's discretion.

Resolution proceedings are confidential. All individuals present at any time during the Resolution Process are expected to maintain the confidentiality of the proceedings in accordance with the College Policy.

Informal Resolution

To initiate Informal Resolution, a Complainant or Respondent may make such a request to the Coordinator at any time prior to a final determination, or the Coordinator may offer the option to the Parties, in writing. The College will obtain voluntary, written confirmation that all Parties wish to resolve the matter through Informal Resolution before proceeding and will not pressure the Parties to participate in Informal Resolution.

Before initiation of an Informal Resolution process, the College will provide the Parties with a NOIA that explains:

The allegations.

The requirements of the Informal Resolution process.

That, prior to agreeing to a resolution, any party has the right to withdraw from the Informal Resolution process and to initiate or resume the College's Resolution Process.

That the Parties' agreement to a resolution at the conclusion of the Informal Resolution Process will preclude the Parties from initiating or resuming the Resolution Process arising from the same allegations.

The potential terms that may be requested or offered in an Informal Resolution agreement, including notification that an Informal Resolution agreement is binding only on the Parties.

What information the College will maintain, and whether and how it could disclose such information for use in its Resolution Process.

The College offers four categories of Informal Resolution:

Supportive Resolution. When the Coordinator can resolve the matter informally by providing supportive measures (only) designed to remedy the situation.

Educational Conversation. When the Coordinator can resolve the matter informally by having a conversation with the Respondent to discuss the Complainant's concerns and institutional expectations

or can accompany the Complainant if they desire to discuss the conduct alleged in the Complaint with the Respondent.

Accepted Responsibility. When the Respondent is willing to accept responsibility for violating the Policy and is willing to agree to actions that will be enforced similarly to sanctions, and the Complainant(s) and the College are agreeable to the resolution terms.

Alternative Resolution. When the Parties agree to resolve the matter through an alternative resolution mechanism (which could include, but is not limited to, mediation, shuttle negotiation, restorative practices, facilitated dialogue, etc.), as described below.

The individual facilitating an Informal Resolution must be trained and cannot be the Investigator, Decision-maker, or Appeal Decision-maker.

It is not necessary to pursue Informal Resolution first in order to pursue an Administrative Resolution. Any party participating in Informal Resolution can withdraw from the Informal Resolution Process at any time prior to an informal resolution agreement and initiate or resume the Administrative Process.

The Parties may agree, as a condition of engaging in Informal Resolution, on what statements made or evidence shared during the Informal Resolution process will not be considered in the Administrative Resolution, should Informal Resolution not be successful, unless agreed to by all Parties.

If an investigation is already underway, the Coordinator has discretion to determine if an investigation will be paused, if it will be limited, or if it will continue during the Informal Resolution process.

Process for Categories of Informal Resolution

Supportive Resolution

The Coordinator will meet with the Complainant to determine reasonable supportive measures that are designed to restore or preserve the Complainant's access to the College's Education Program and activity. Such measures can be modified as the Complainant's needs evolve over time or circumstances change. If the Respondent has received the NOIA, the Coordinator may also provide reasonable supportive measures for the Respondent as deemed appropriate. This option is available when the Complainant does not want to engage the other resolution options, and the Coordinator does not initiate a Complaint.

Educational Conversation

The Complainant(s) may request that the Coordinator address their allegations by meeting (with or without the Complainant) with the Respondent(s) to discuss concerning behavior and institutional policies and expectations. Such a conversation is non-disciplinary and non-punitive. Respondent(s) are not required to attend such meetings, nor are they compelled to provide any information if they attend. The conversation will be documented as the Informal Resolution for the matter, if it takes place and resolves the matter to the satisfaction of the Parties. In light of this conversation, or the Respondent's decision not to attend, the Coordinator may also implement remedial actions to ensure that policies and

expectations are clear and to minimize the risk of the recurrence of any behaviors that may not align with Policy.

Accepted Responsibility

The Respondent may accept responsibility for any or all of the alleged Policy violations at any point during the Resolution Process. If the Respondent indicates an intent to accept responsibility for all alleged Policy violations, the ongoing process will be paused, and the Coordinator will determine whether Informal Resolution is an option.

If Informal Resolution is available, the Coordinator will determine whether all Parties and the College are able to agree on responsibility, restrictions, sanctions, restorative measures, and/or remedies. If so, the Coordinator implements the accepted finding that the Respondent is in violation of the College Policy, implements agreed-upon restrictions and remedies, and determines the appropriate responses in coordination with other appropriate administrator(s), as necessary.

This resolution is not subject to appeal once all Parties indicate their written agreement to all resolution terms. When the Parties cannot agree on all terms of resolution, the Resolution Process will either be initiated or resume.

When a resolution is reached, the appropriate sanction(s) or responsive actions are promptly implemented to effectively stop the discrimination or harassment, prevent its recurrence, and remedy the effects of the discriminatory conduct, both on the Complainant and the community.

Alternative Resolution

The College offers a variety of alternative resolution mechanisms to best meet the specific needs of the Parties and the nature of the allegations. Alternative resolution may involve agreement to pursue individual or community remedies, including targeted or broad-based educational programming or training; supported direct conversation or interaction with the Respondent(s); indirect action by the Coordinator or other appropriate College officials; and other forms of resolution that can be tailored to the needs of the Parties. Some alternative resolution mechanisms will result in an agreed-upon outcome, while others are resolved through dialogue. All Parties must consent to the use of an alternative resolution approach, and the Parties may, but are not required to, have direct or indirect contact during an alternative resolution process.

The Coordinator may consider the following factors to assess whether alternative resolution is appropriate, or which form of alternative resolution may be most successful for the Parties:

The Parties' amenability to alternative resolution

Likelihood of potential resolution, considering any power dynamics between the Parties

The nature and severity of the alleged misconduct

The Parties' motivation to participate

Civility of the Parties

Results of a violence risk assessment/ongoing risk analysis

Respondent's disciplinary history

Whether an emergency removal or other interim action is needed
Skill of the alternative resolution facilitator with this type of Complaint
Complaint complexity
Emotional investment/capability of the Parties
Rationality of the Parties
Goals of the Parties
Adequate resources to invest in alternative resolution (e.g., time, staff)

The Coordinator has the authority to determine whether alternative resolution is available or successful, to facilitate a resolution that is acceptable to all Parties, and/or to accept the Parties' proposed resolution, usually through their Advisors, often including terms of confidentiality, release, and non-disparagement.

Parties do not have the authority to stipulate restrictions or obligations for individuals or groups that are not involved in the alternative resolution process. The Coordinator will determine whether additional individual or community remedies are necessary to meet the College's compliance obligations in addition to the alternative resolution.

The Coordinator maintains records of any resolution that is reached and will provide notification to the Parties of what information is maintained. Failure to abide by a resolution agreement may result in appropriate responsive/disciplinary actions (e.g., dissolution of the agreement and resumption of the Resolution Process, referral to the conduct process for failure to comply, application of the enforcement terms of the agreement). The results of an alternative resolution are not appealable.

If an Informal Resolution option is not available or selected, the College will initiate or continue an investigation and subsequent Resolution Process to determine whether the Policy has been violated.

Administrative Resolution Process (see Section 46 below)

Resolution Process Pool

The Resolution Process relies on a pool of administrators ("the Pool") to carry out the process.

Pool Member Roles

Members of the Pool are trained annually, and can serve in the following roles, at the discretion of the Coordinator:

Appropriate intake of and initial guidance pertaining to Complaints
Advisor to Parties
Informal Resolution Facilitator
Perform or assist with initial evaluation
Investigator
Decision-maker for challenges to emergency removal and supportive measures
Decision-maker
Appeal of Dismissal Decision-maker
Appeal Decision-maker

Pool Member Appointment

The Coordinator, in consultation with senior administrators as necessary, appoints the Pool, which acts with independence and impartiality. Although members of the Pool are typically trained in a variety of skill sets and can rotate amongst the different roles listed above in different Complaints, the College can also designate permanent roles for individuals in the Pool.

Notice of Investigation and Allegations (NOIA)

Prior to an investigation, the Coordinator will provide the Parties with a detailed written NOIA. Amendments and updates to the NOIA may be made as the investigation progresses and more information becomes available regarding the addition or dismissal of various allegations. For climate/culture investigations that do not have an identifiable Respondent, the NOIA will be sent to the department/office/program head for the area/program being investigated.

The NOIA typically includes:

A meaningful summary of all allegations

The identity of the involved Parties (if known)

The specific misconduct being alleged

The date and location of the alleged incident(s) (if known)

The specific policies/offenses implicated

A description of, link to, or copy of the applicable procedures

A statement that the Parties are entitled to an equal opportunity to access the relevant and not otherwise impermissible evidence

The name(s) of the Investigator(s), along with a process to notify the Coordinator of any conflict of interest that the Investigator(s) may have in advance of the interview process

A statement that the College presumes the Respondent is not responsible for the reported misconduct unless and until the evidence supports a different determination

A statement that determinations of responsibility are made at the conclusion of the process and that the Parties will be given an opportunity during the review and comment period to inspect and review all relevant evidence

A statement that retaliation is prohibited

Information about the confidentiality of the process, including that the Parties and their Advisors (if applicable) may not share the College work product obtained through the Resolution Process

A statement that the Parties may have an Advisor of their choice who may accompany them through all steps of the Resolution Process

A statement informing the Parties that the College's Policy prohibits knowingly making false statements, including knowingly submitting false information during the Resolution Process

Detail on how a party may request disability accommodations or other support assistance during the Resolution Process

A link to the College's VAWA Brochure

An instruction to preserve any evidence that is directly related to the allegations

A statement that Parties who are members of a union are entitled to union representation throughout the process

A statement that the process will be prompt and fair.

Notification will be made in writing and may be delivered by one or more of the following methods: in person, mailed to the Parties' local or permanent address(es) as indicated in official the College records, or emailed to the Parties' the College-issued email or designated accounts. Once mailed, emailed, and/or received in person, the notification will be presumptively delivered.

Resolution Timeline

The College will make a good faith effort to complete the Resolution Process within 60-90 business days, including any appeals, which the Coordinator can extend as necessary for appropriate cause. The Parties will receive regular updates on the progress of the Resolution Process, as well as notification and a rationale for any extensions or delays, and an estimate of how much additional time will be needed to complete the process.

Investigations are completed expeditiously, normally within sixty (60) business days, though some investigations may take longer, depending on issues such as the nature, extent, and complexity of the allegations, witness availability, law enforcement involvement, and other factors.

If a party or witness chooses not to participate in the Resolution Process or becomes unresponsive, the College reserves the right to continue it without their participation to ensure a prompt resolution. Non-participatory or unresponsive Parties retain the rights outlined in this Policy and the opportunity to participate in the Resolution Process.

The College may undertake a short delay in its investigation if circumstances require. Such circumstances include but are not limited to a request from law enforcement to temporarily delay the investigation, the need for language assistance, the absence of Parties and/or witnesses, and/or health conditions. The College will promptly resume its Resolution Process as soon as feasible. During such a delay, the College will implement and maintain supportive measures for the Parties as deemed appropriate.

The College action(s) or processes are not typically altered or precluded on the grounds that civil or criminal charges involving the underlying incident(s) have been filed or that criminal charges have been dismissed or reduced.

The College will make a good faith effort to complete the Resolution Process as promptly as circumstances permit and will regularly communicate with the Parties to update them on the progress and timing of the process.

Ensuring Impartiality

Any individual materially involved in the administration of the Resolution Process, including the Coordinator, Investigator(s), and Decision-maker(s), may neither have nor demonstrate a conflict of interest or bias for a party generally, or for a specific Complainant or Respondent.

The Coordinator will vet the assigned Investigator(s), Decision-maker(s), and Appeal Decision-makers for impartiality to ensure to the extent possible that there are no actual or apparent conflicts of interest or disqualifying biases. At any time during the Resolution Process, the Parties may raise a concern regarding bias or conflict of interest, and the Coordinator will determine whether the concern is reasonable and supported. If so, another Pool member will be assigned, and the impact of the bias or conflict, if any, will be remedied. If the source of the conflict of interest or bias is the Coordinator, concerns should be raised with the Dean of Equity and Inclusion.

The Resolution Process involves an objective evaluation of all available relevant and not otherwise impermissible evidence, including evidence that supports that the Respondent engaged in a Policy violation and evidence that supports that the Respondent did not engage in a Policy violation. Credibility determinations may not be based solely on an individual's status or participation as a Complainant, Respondent, or witness. All Parties have a full and fair opportunity, through the investigation process, to suggest witnesses and questions, to provide evidence, and to receive a written investigation report that accurately summarizes this evidence.

Investigator Appointment

Once an investigation is initiated, the Coordinator appoints an Investigator(s) to conduct it. These Investigators may be members of the Resolution Process Pool, or any other properly trained Investigator, whether internal or external to the College's community.

Witness Role and Participation in the Investigation

Employees (not including Complainant and Respondent) are required to cooperate with and participate in the College's investigation and Resolution Process. Student witnesses and witnesses from outside the College community cannot be required to participate but are encouraged to cooperate with the College investigations and to share what they know about a Complaint.

Interviews may be conducted in person, via online video platforms (e.g., Zoom, Microsoft Teams, FaceTime, WebEx), or, in limited circumstances, by telephone. The College will take appropriate steps to ensure the security/privacy of remote interviews.

Parties and witnesses may also provide written statements in lieu of interviews or choose to respond to written questions, if deemed appropriate by the Investigator(s), though not preferred.

Interview Recording

It is standard practice for Investigators to create a record of all interviews pertaining to the Resolution Process. The Parties may review copies of their own interviews, upon request. No unauthorized audio or video recording of any kind is permitted during investigation meetings.

All interviews are recorded, and all involved persons should be made aware of the audio and/or video recording. The recording and/or transcript of those interviews will be provided to the Parties for their review, after which the Parties may pose additional questions to each other. Those subsequent meetings or interviews are also recorded and/or transcribed and shared with the Parties.

Evidentiary Considerations

The Investigator(s) and the Decision-maker(s) will only consider evidence that is deemed relevant and not otherwise impermissible.

Relevant Evidence is that which may aid in determining whether the allegation occurred, or whether the behavior constitutes a violation of Policy.

Impermissible evidence includes evidence that relates to the Complainant's sexual interests or prior sexual conduct, unless 1) evidence about the Complainant's prior sexual conduct is offered to prove that someone other than the Respondent committed the alleged conduct, or 2) is evidence about specific incidents of the Complainant's prior sexual conduct with the Respondent that is offered to prove consent.

The fact of prior consensual sexual conduct occurred between the Complainant and Respondent does not by itself demonstrate or imply the Complainant's consent or preclude a determination that sex-based harassment occurred.

Previous disciplinary action of any kind involving the Respondent may not be considered in determining responsibility for violating College policies unless there is an allegation of a pattern of misconduct. Such information may be considered in determining an appropriate sanction upon a determination of responsibility. Barring a pattern allegation, this information is only considered at the sanction stage of the process and is not shared until then.

Other impermissible evidence includes: (1) evidence that is protected under a privilege recognized by Federal or State law or evidence provided to a confidential employee, unless the person to whom the privilege or confidentiality is owed has voluntarily waived the privilege or confidentiality; and (2) a party's or witness's records that are made or maintained by a physician, psychologist, or other recognized professional or paraprofessional in connection with the provision of treatment to the party or witness, unless the College obtains that party's or witness's voluntary, written consent for use in its grievance procedures.

Within the limitations stated above, the investigation and determination can consider character evidence, if offered, but that evidence is unlikely to be relevant unless it is fact evidence or relates to a pattern of conduct.

Respondent Admits Responsibility

At any point in the proceedings, if a Respondent elects to admit to the charged violations and waive further process, the Decision-maker is authorized to accept that admission, adopt it as their finding/final determination, and administer sanctions. This would waive the Respondent's right to appeal. If the Respondent rejects the finding/final determination/sanctions, or does not admit to all conduct charged, the Resolution Process continues to its conclusion. The Complainant retains their right to appeal a determination when a Respondent admits responsibility.

Investigation

All investigations must be adequate, thorough, reliable, impartial, prompt, and fair. They involve interviewing all relevant Parties and relevant, available witnesses, obtaining relevant evidence, and identifying sources of expert information, as necessary.

After an interview, Parties and witnesses will be asked to verify the accuracy of the recording, transcript, or summary of their interview. They may submit changes, edits, or clarifications. If the Parties or witnesses do not respond within the time period designated for verification, objections to the accuracy of the recording, transcript, or summary will be deemed to have been waived, and no changes will be permitted.

The College may consolidate Complaints against more than one Respondent, or by more than one Complainant against one or more Respondents, when the allegations arise from the same facts or circumstances or implicate a pattern, collusion, and/or other shared or similar actions.

The Investigator(s) typically take(s) the following steps, if not already completed and not necessarily in this order:

Determine the identity and contact information of the Complainant.

Identify all Policy violations implicated by the alleged misconduct and notify the Complainant and Respondent of all specific policies implicated.

Assist the Coordinator, if needed, with conducting a prompt initial evaluation to determine if the allegations indicate a potential Policy violation.

Work with the Coordinator, as necessary, to prepare the initial NOIA. The NOIA may be amended with any additional or dismissed allegations.

Commence a thorough, reliable, and impartial investigation by identifying issues and developing a strategic investigation plan, including a witness list, evidence list, intended investigation timeframe, and order of interviews of the Parties and witnesses.

When participation of a party is expected, provide that party with written notification of the date, time, and location of the meeting, as well as the expected participants and purpose.

Make good faith efforts to notify each party of any meeting or interview involving another party, in advance when possible.

Interview the Complainant and the Respondent and conduct any necessary follow-up interviews with each.

Interview all available, relevant witnesses and conduct follow-up interviews as necessary.

Provide each interviewed party and witness an opportunity to review and verify the Investigator's summary notes (or transcript or recording) of the relevant evidence/testimony from their respective interviews and meetings.

Allow each party the opportunity to suggest witnesses and questions they wish the Investigator(s) to ask of another party and/or witnesses. Document which questions were asked with a rationale for any changes or omissions in the investigation report.

Where possible, complete the investigation promptly and without unreasonable deviation from the intended timeline.

Provide the Parties with regular status updates throughout the investigation.

Prior to the conclusion of the investigation, provide the Parties and their respective Advisors with a list of witnesses whose information will be used to render a finding.

Ask the Parties to provide a list of questions they would like asked of the other party or any witnesses. The Investigator will ask those questions deemed relevant, and for any question deemed not relevant, will provide a rationale for not asking the question.

Write a draft investigation report that gathers, assesses, and synthesizes the evidence, accurately summarizes the investigation, and party and witness interviews, and provides all relevant evidence. Provide the Parties and their respective Advisors an electronic copy of the draft investigation report as well as an opportunity to inspect and review all relevant evidence obtained as part of the investigation for a review and comment period of ten (10) business days so that each party may meaningfully respond to the evidence. The Parties may elect to waive all or part of the review period.

The Investigator may share the investigation report with the Coordinator and/or legal counsel for their review and feedback.

Administrative Resolution Process

The Administrative Resolution Process is used for all Complaints of discrimination on the basis of protected characteristics, harassment, retaliation, and Other Prohibited Behaviors (as defined in Policy) or when Informal Resolution is either not elected or is unsuccessful.

The Administrative Resolution Process consists of a hand-off of the investigation report and all relevant evidence to the Decision-maker to make a finding and determine sanctions (if applicable).

At the discretion of Coordinator, the assigned Decision-maker will be an individual or a panel drawn from the Resolution Process Pool, or other trained individuals either internal or external to the institution. Once the Decision-maker receives and reviews the file, they can recommend dismissal to the Coordinator, if they believe the grounds are met.

The Administrative Resolution Process typically takes approximately thirty (30) business days to complete, beginning with the Decision-maker's receipt of the Draft Investigation Report. The Parties will be regularly updated on the timing and any significant deviation from this typical timeline.

Investigator-led Questioning Meetings

The Coordinator provides the Draft Investigation Report to the Decision-maker and the Parties simultaneously for review. The Decision-maker can then provide the Investigator with a list of additional relevant questions to ask the Parties or any witnesses.

To the extent credibility is in dispute and relevant to one or more of the allegations, the questions provided by the Decision-maker may explore credibility.

The Investigator will also ask each of the Parties to provide a proposed list of additional questions to ask the other Parties and any witnesses.

To the extent credibility is in dispute and relevant to one or more of the allegations, questions proposed by the Parties may also explore credibility.

All party questions must be posed during this phase of the process and cannot be posed later unless authorized by the Decision-maker.

The Investigator will share all party-proposed questions with the Decision-maker, who will finalize the list with the Investigator to ensure all questions are both relevant and permissible.

The Investigator will then hold individual meetings with the Parties and witnesses to ask the questions posed by the Decision-maker, as well as the questions proposed by the Parties that have been deemed relevant and not duplicative, including questions intended to assess credibility. These meetings will be recorded and transcribed.

For any question deemed not relevant or duplicative, the Investigator will provide a rationale for not asking the question, either during the recorded meeting, or in writing (typically as an appendix to the Final Investigation Report).

Typically, within three (3) business days of the last of these meetings, the recordings or transcripts of them will be provided to the Parties for their review. The Parties will then have five (5) business days to review these recordings or transcripts and propose any follow-up questions for the Investigator to ask. The Investigator will review the proposed follow-up questions with the Decision-maker, to determine relevance and permissibility. If deemed necessary, the Investigator will then meet individually with the Parties or witnesses for whom there are relevant, and not duplicative, follow-up questions. These follow-up meetings will also be recorded, and the Parties will receive the recordings or transcripts of these meetings. This final round of questioning is the last round permitted, unless permission is granted to extend, by the Decision-maker.

The Investigator will then incorporate any new, relevant evidence and information obtained through the Parties' review of the Draft Investigation Report, the questioning, and follow-up meetings into a Final Investigation Report.

The Investigator will also respond in writing (typically within the Final Investigation Report) to the relevant elements of the Parties' responses to the Draft Investigation Report and incorporate relevant elements of the Parties' written responses, additional relevant evidence, and any necessary revisions into the Final Investigation Report.

The Investigator will then share the Final Investigation Report with the Coordinator and/or legal counsel for their review and feedback.

The Investigator will then provide the Coordinator with the Final Investigation Report and investigation.

The Decision-maker's Determination

The Coordinator will provide the Decision-maker, the Parties, and their Advisors with the Final Investigation Report (FIR) and investigation file, including the evidence and information obtained through the Investigator-led questioning meetings.

The Decision-maker will review the FIR, all appendices, and the investigation file.

If the Decision-maker determines that the record is incomplete, the Decision-maker may direct a re-opening of the investigation, or may direct or conduct any additional inquiry necessary, including informal meetings with the Parties or any witnesses, if needed.

Upon reviewing the relevant evidence, the Decision-maker may also choose to pose additional questions:

To the extent credibility is in dispute and relevant to one or more of the allegations, the Decision-maker may meet individually with the Parties and witnesses to question them in order to assess their credibility. These meetings will be recorded, and the recording or transcript will be shared with the Parties.

At their discretion, the Decision-maker may also meet with any party or witness to ask additional relevant questions that will aid the Decision-maker in making their findings. These meetings will be recorded, and the recording or transcript will be shared with the Parties.

The Decision-maker will then apply the preponderance of the evidence to determine whether the Respondent is responsible for each of the alleged Policy violations and, if applicable, any associated sanctions.

Timeline. The Decision-maker's determination process typically takes approximately five (5) business days, but this timeframe can vary based on a number of factors and variables. The Parties will be notified of any delays.

Impact Statements. Prior to a determination of responsibility, the Coordinator will also provide the Parties with an opportunity to submit a written impact and/or mitigation statement. The Coordinator will review these statements upon receipt to determine whether there are any immediate needs, issues, or concerns, but will otherwise hold them until after the Decision-maker has made the determination of responsibility on the allegations. If there are any findings of a Policy violation, the Decision-maker will request the Impact Statements from the Coordinator and review them prior to determining sanctions. They will also be exchanged between the Parties at that time.

If it is later determined that a party or witness intentionally provided false or misleading information, that action could be grounds for re-opening a Resolution Process at any time, and/or referring that information to another process for resolution.

Sanctions

Factors the Decision-maker may consider when determining sanctions and responsive actions include, but are not limited to:

The nature, severity of, and circumstances surrounding the violation(s)

The Respondent's disciplinary history

The need for sanctions/responsive actions to bring an end to the discrimination, harassment, and/or retaliation

The need for sanctions/responsive actions to prevent the future recurrence of discrimination, harassment, and/or retaliation

The need to remedy the effects of the discrimination, harassment, and/or retaliation on the Complainant and the community

The impact on the Parties

The Respondent's acceptance of responsibility

Any other information deemed relevant by the Decision-maker(s)

The sanctions will be implemented as soon as it is feasible once a determination is final, either upon the outcome of any appeal or the expiration of the window to appeal without an appeal being requested.

The sanctions described in this Policy are not exclusive of, and may be in addition to, other actions taken, or sanctions imposed, by external authorities.

Student Sanctions

The following are the common sanctions that may be imposed upon students singly or in combination:

Disciplinary Warning: A letter indicating that a student has been found responsible for a violation. This sanction indicates that if the student is again found in violation, a sanction will likely be imposed that reflects a repeated violation.

Disciplinary Probation Level 1: A status indicating that a student has been found responsible for a violation that reflects a serious violation. This sanction will be in effect for a specified period of time and indicates that if the student is again found in violation during the period of this status, a sanction of Disciplinary Probation Level 2 or greater will likely be necessitated.

Disciplinary Probation Level 2: Formal notice that a student's status at the College is in jeopardy as a result of one or more violations. This sanction will be in effect for a specified period of time and indicates that if the student is found in violation of College policies during the period of this status, additional imposed sanctions may include Loss of Housing, Suspension from the College, or Expulsion from the College. While on Level 2 probation, a student will not be permitted to serve as a member of Student Government Association, an executive Board member of a student organization, or on any standing College committee. A student's ability to participate in other college programs may also be limited by this status as determined by those offices (e.g., Study Away programs, Career and Professional Development internships). When placed on this status, the Office of the Dean of the College and the student's parent/guardian may be notified as permitted by FERPA.

Loss of Housing: Dismissal from College owned housing for a specified period of time. Financial reimbursement is made according to the refund schedule in the College Catalog. During this period, a student is not eligible for summer housing. After this period is concluded, the student may request the Dean of Students or their designee to re-evaluate the student's ability to return to the residence hall. Loss of housing may result in notification of the student's faculty and staff adviser, class dean, and parent/guardian as permitted by FERPA.

Suspension from the College: Suspension from the College is a temporary dismissal from the College for a specified period of time. After this period is concluded, the student may resume studies following an interview with the Title IX Coordinator or their designee. A suspended student may not engage in College activities, use any College facilities, or be on College property without express permission from the Dean of Students or their designee. Financial reimbursement is made according to the refund schedule in the College Catalog. When suspended from the College, the student's class dean, athletic coach, and parent/guardian may be notified. A suspended student does not have the opportunity to earn academic credit towards a Connecticut College degree unless granted permission by the Dean of Students. Conditions for return from suspension may be established at the time of the suspension.

Expulsion from the College: Permanent dismissal from the College without the right to return. An expelled student no longer has the privileges of matriculated students and may not engage in College activities, use any College facilities, or be on College property. Financial reimbursement is made according to the refund schedule listed in the College Catalog. When expelled from the College, the student's parent/guardian may be notified as permitted by FERPA.

Other Actions: In addition to or in place of the above sanctions, the College may impose any other sanctions in the Student Handbook as deemed appropriate.

Student Group and Organization Sanctions

The following are the common sanctions that may be imposed upon student groups or organizations singly or in combination:

Warning: A formal statement that the conduct was unacceptable and a warning that further violation of any College policy, procedure, or directive will result in more severe sanctions/responsive actions.

Probation: A written reprimand for violation of institutional policy, providing for more severe disciplinary sanctions in the event that the organization is found in violation of any College policy, procedure, or directive within a specified period of time. Terms of the probation will be articulated and may include denial of specified social and event privileges, denial of College funds, ineligibility for honors and awards, restrictions on new member recruitment, no-contact orders, and/or other measures deemed appropriate.

Suspension: Termination of student organization recognition for a definite period of time not to exceed two years and/or until specific criteria are met. During the suspension period, a student organization may not conduct any formal or informal business or participate in College-related activities, whether they occur on or off campus. Re-recognition is possible but not guaranteed and will only be considered after the end of the suspension period and based on meeting all re-recognition criteria and obtaining clearance from the College.

Expulsion: Permanent termination of student organization recognition and revocation of the privilege to congregate and conduct business on campus as an organization for any reason.

Loss of Privileges: Restricted from accessing specific College privileges for a specified period of time.

Other Actions: In addition to or in place of the above sanctions, the College may impose any other sanctions as deemed appropriate.

Employee Sanctions/Responsive/Corrective Actions

Responsive actions for an employee who has engaged in discrimination, harassment, and/or retaliation will be administered in accordance with the IFF, Employee Handbook, and/or collective bargaining agreement as applicable, and may include:

- Verbal or Written Warning
- Performance Improvement Plan/Management Process
- Enhanced Supervision, Observation, or Review
- Required Counseling
- Required Training or Education
- Probation
- Denial of Pay Increase/Pay Grade
- Loss of Oversight or Supervisory Responsibility
- Demotion
- Transfer
- Shift or schedule adjustments
- Reassignment
- Delay of (or referral for delay of) Tenure Track Progress
- Assignment to a New Supervisor

Restriction of Stipends, Research, and/or Professional Development Resources
Suspension/Administrative Leave with Pay
Suspension/Administrative Leave without Pay
Termination

Other Actions: In addition to or in place of the above sanctions/responsive actions, the College may assign any other responsive actions as deemed appropriate.

For faculty sanctions, procedures described in IFF Section 1.5 will also apply.

Notice of Outcome

Within five (5) business days of the conclusion of the Resolution Process, the Coordinator provides the Parties with a written outcome notification. The outcome notification will specify the finding for each alleged Policy violation, all applicable sanctions that the College is permitted to share pursuant to state or federal law, and a detailed rationale, written by the Decision-maker, supporting the findings to the extent the College is permitted to share under federal or state law.

The notification will also detail the Parties' equal rights to appeal, the grounds for appeal, the steps to request an appeal, and when the determination is considered final if no party appeals.

The Coordinator will provide the Parties with the outcome notification simultaneously, or without significant time delay between notifications. The written outcome notification may be delivered by one or more of the following methods: in person, mailed to the Parties' local or permanent address as indicated in official the College records, or emailed to the Parties' the College-issued or designated email account. Once mailed, emailed, and/or received in person, the outcome notification is presumptively delivered.

Withdrawal or Resignation Before Complaint Resolution

Students

Should a student Respondent decide not to participate in the Resolution Process, the process proceeds absent their participation to a reasonable resolution. If a student Respondent withdraws from the College, the Resolution Process may continue, or the Coordinator may exercise their discretion to dismiss the Complaint. If the Complaint is dismissed, the College will still provide reasonable supportive or remedial measures as deemed necessary to address safety and/or remedy any ongoing effects of the alleged harassment, discrimination, and/or retaliation.

Regardless of whether the Complaint is dismissed or pursued to completion of the Resolution Process, the College will continue to address and remedy any systemic issues or concerns that may have contributed to the alleged violation(s), and any ongoing effects of the alleged discrimination, harassment, and/or retaliation.

When a student Respondent withdraws or leaves while the process is pending, the student may not return to the College in any capacity until the Complaint is resolved and any sanctions imposed are

satisfied. If the student indicates they will not return, the Coordinator has discretion to dismiss the Complaint. The Registrar, Office of Admissions, and HR may be notified, accordingly.

If the student Respondent takes a leave for a specified period of time (e.g., one semester or term), the Resolution Process may continue remotely. If found in violation, that student is not permitted to return to the College unless and until all sanctions, if any, have been satisfied.

Employees

Should an employee Respondent decide not to participate in the Resolution Process, the process proceeds absent their participation to a reasonable resolution. If an employee Respondent leaves their employment with the College with unresolved allegations pending, the Resolution Process may continue, or the Coordinator may exercise their discretion to dismiss the Complaint. If the Complaint is dismissed, the College may still provide reasonable supportive or remedial measures as deemed necessary to address safety and/or remedy any ongoing effects of the alleged discrimination, harassment, and/or retaliation.

When an employee resigns and the Complaint is dismissed, the employee may not return to the College in any capacity. The Registrar, Office of Admissions, and HR will be notified, accordingly. A note will be placed in the employee's file that they resigned with allegations pending and are not eligible for academic admission or rehire with the College. The records retained by the Coordinator will reflect that status.

Appeal of the Determination

The Coordinator will designate an Appeal Decision-maker – either a three-member panel, on individual chosen from the Pool, or other trained internal or external individuals, to hear the appeal. No Appeal Decision-maker(s) will have been previously involved in the Resolution Process for the Complaint, including in any supportive measure challenge or dismissal appeal that may have been decided earlier in the process. If a panel is used, a voting chair will be designated by the Coordinator.

Appeal Grounds

Appeals are limited to the following grounds:

A procedural irregularity that would change the outcome.

New evidence that would change the outcome and that was not reasonably available at the time the determination regarding responsibility was made.

The Coordinator, Investigator(s), or Decision-maker(s) had a conflict of interest or bias for or against complainants or respondents generally or the specific Complainant or Respondent that would change the outcome.

The Final Determination by the Decision-maker is substantially contrary to the weight of the evidence in the record (applicable to sanctions of suspension, expulsion, or termination, only).

The sanctions fall outside the range of sanctions designated for this offense, considering the cumulative conduct/disciplinary record of the Respondent (applicable to sanctions of suspension, expulsion, or termination, only).

Request for Appeal

Any party may submit a written request for appeal (“Request for Appeal”) to the Coordinator within five (5) business days of the delivery of the Notice of Outcome.

The Request for Appeal will be forwarded to the Appeal Decision-maker for consideration to determine if the request meets the grounds for appeal (a Review for Standing). This is not a review of the merits of the appeal, but solely a determination as to whether the request could reasonably be construed to meet the permissible grounds for appeal and is timely filed.

If the Request for Appeal does not provide information that meets the grounds for appeal, the request will be denied by the Appeal Decision-maker, and the Parties and their Advisors will be simultaneously notified in writing of the denial and the rationale.

If any of the information in the Request for Appeal meets the grounds for appeal in this Policy, then the Appeal Decision-maker will notify all Parties and their Advisors, the Coordinator, and, when appropriate, the Investigator(s) and/or the original Decision-maker.

All other Parties and their Advisors, the Coordinator, and, when appropriate, the Investigator(s) and/or the Decision-maker will be provided a copy of the Request for Appeal with the approved grounds and then be given five (5) business days to submit a response to the portion of the appeal that was approved and involves them. The Appeal Decision-maker will forward all responses, if any, to all Parties for review and comment.

The non-appealing party (if any) may also choose to appeal at this time. If so, that Request for Appeal will be reviewed by the Appeal Decision-maker to determine if it meets the grounds in this Policy and will either be approved or denied. If approved, it will be forwarded to the party who initially requested an appeal, the Coordinator, and the Investigator(s) and/or original Decision-maker, as necessary, who will submit their responses, if any, within five (5) business days. Any such responses will be circulated for review and comment by all Parties. If denied, the Parties and their Advisors will be notified accordingly, in writing.

No party may submit any new Requests for Appeal after this time period. The Appeal Decision-maker will collect any additional information needed and all documentation regarding the approved appeal grounds, and the subsequent responses will be shared with the Appeal Decision-maker, who will promptly render a decision.

Appeal Determination Process

In most cases, appeals are confined to a review of the written documentation or record of the original determination and pertinent documentation regarding the specific appeal grounds. The Appeal Decision-maker will consider the merits of the appeal as soon as is practicable.

Appeal decisions are to be deferential to the original determination, making changes to the finding only when there is clear error and to the sanction(s)/responsive action(s) only if there is a compelling

justification to do so. All decisions are made by majority vote if the Appeal Decision-maker is a panel and apply the preponderance of the evidence standard of proof.

An appeal is not an opportunity for the Appeal Decision-makers to substitute their judgment for that of the original Decision-maker merely because they disagree with the finding and/or sanction(s).

The Appeal Decision-maker may consult with the Coordinator and/or legal counsel on questions of procedure or rationale, for clarification, if needed. The Coordinator will maintain documentation of all such consultation.

Appeal Outcome

An appeal may be granted or denied. Appeals that are granted should normally be remanded (or partially remanded) to the original Investigator(s) and/or Decision-maker with corrective instructions for reconsideration. In rare circumstances where an error cannot be cured by the original Investigator(s) and/or Decision-maker or the Coordinator (as in cases of bias), the Appeal Decision-maker may order a new investigation and/or a new determination with new Pool members serving in the Investigator and Decision-maker roles.

A Notice of Appeal Outcome letter (“Appeal Outcome”) will be sent to all Parties simultaneously, or without significant time delay between notifications. The Appeal Outcome will specify the finding on each appeal ground, any specific instructions for remand or reconsideration, all sanction(s) that may result which the College is permitted to share according to federal or state law, and the rationale supporting the essential findings to the extent the College is permitted to share under federal or state law.

Written notification may be delivered by one or more of the following methods: in person, mailed to the Parties’ local or permanent address as indicated in official institutional records, or emailed to the Parties’ the College-issued email or otherwise approved account. Once mailed, emailed, and/or received in person, the Appeal Outcome will be presumptively delivered.

Once an appeal is decided, the outcome is final and constitutes the Final Determination. When appeals result in no change to the finding or sanction, that decision is final. When an appeal results in a new finding or sanction on remand, that finding or sanction can be appealed one final time on the grounds listed above and in accordance with these procedures.

If a remand results in a new determination that is different from the previous appealed determination, that new determination can be appealed, once, on any of the five (5) available appeal grounds.

Sanction Status During the Appeal

Any sanctions imposed as a result of the determination are stayed (i.e., not implemented) during the appeal process, and supportive measures may be maintained or reinstated until the appeal determination is made.

If any of the sanctions are to be implemented immediately post-determination, but pre-appeal, then the emergency removal procedures (detailed above) for a “show cause” meeting on the justification for doing so must be permitted within two (2) business days of implementation.

Long-Term Remedies/Other Actions

Following the conclusion of the Resolution Process, and in addition to any sanctions implemented or Informal Resolution terms, the Coordinator may implement additional long-term remedies or actions with respect to the Parties and/or the College community that are intended to stop the discrimination, harassment, and/or retaliation, remedy the effects, and prevent recurrence.

These remedies/actions may include, but are not limited to:

- Referral to counseling and health services
- Referral to the Employee Assistance Program
- Course and registration adjustments, such as retroactive withdrawals
- Education to the individual and/or the community
- Permanent alteration of housing assignments
- Permanent alteration of work arrangements for employees
- Provision of campus safety escorts
- Climate surveys
- Policy modification and/or training
- Provision of transportation assistance
- Implementation of long-term contact limitations between the Parties
- Implementation of adjustments to academic deadlines, course schedules, etc.

At the discretion of the Coordinator, certain long-term supportive measures may also be provided to the Parties even if no Policy violation is found.

When no Policy violation is found, the Coordinator will take appropriate steps to ensure that the Respondent is not effectively denied access to the College’s educational programs or activities.

The College will maintain the confidentiality of any long-term remedies/actions/measures, provided confidentiality does not impair the College’s ability to provide these services.

Failure to Comply with Sanctions, Responsive Actions, and/or Informal Resolution Terms

All Respondents are expected to comply with the assigned sanctions, responsive actions, corrective actions, and/or Informal Resolution terms within the timeframe specified by the final Decision-maker(s), including the Appeal Panel or Decision-maker or the Informal Resolution agreement.

Failure to abide by the sanction(s)/action(s) imposed by the date specified, whether by refusal, neglect, or for any other reason, may result in additional sanction(s)/action(s), up to and including suspension, expulsion, and/or termination from the College.

Supervisors are expected to enforce the completion of sanctions/responsive actions for their employees.

A suspension imposed for non-compliance with sanctions will only be lifted when compliance is achieved to the Coordinator's satisfaction.

Recordkeeping

For a period of at least seven (7) years following the conclusion of the Resolution Process, the College will maintain records of:

Each discrimination, harassment, and retaliation resolution process, including any Final Determination regarding responsibility or appeal, and any audio or audiovisual recording or transcript required under federal regulation.

Any disciplinary sanctions imposed on the Respondent.

Any supportive measures provided to the Parties and any remedies provided to the Complainant or the community designed to restore or preserve equal access to the College's Education Program or Activity.

Any appeal and the result therefrom.

Any Informal Resolution and the result therefrom.

All materials used to provide training to the Coordinator, Coordinator and designees, Investigators, Decision-makers, Appeal Decision-makers, Informal Resolution Facilitators, and any person who is responsible for implementing the College's Resolution Process, or who has the authority to modify or terminate supportive measures. The College will make these training materials available for review upon a request from a member of the College community.

All materials used to train all employees consistent with the requirements in the Title IX Regulations.

The College will also maintain any and all records in accordance with federal and state laws.

Accommodations and Support During the Resolution Process

Disability Accommodations

The College is committed to providing reasonable accommodations and support to qualified students, employees, or others with disabilities to ensure equal access to the College's Resolution Process.

Anyone with a qualified disability seeking reasonable accommodations or support should contact the Coordinator, who will work with disability support as appropriate to review the request and, in consultation with the person requesting the accommodation, determine which accommodations are reasonable, appropriate and necessary for full process participation.

Other Support

The College will also address reasonable requests for support for the Parties and witnesses, including:

Language services/Interpreters

Access and training regarding use of technology throughout the Resolution Process

Other support as deemed reasonable and necessary to facilitate participation in the Resolution Process

Revision of these Procedures

These procedures succeed any previous procedures addressing discrimination, harassment, and retaliation for incidents occurring on or after August 1, 2024. The Coordinator will regularly review and update these procedures. The College reserves the right to make changes to this document as necessary, and once those changes are posted online, they are in effect.

If governing laws or regulations change, or court decisions alter, the requirements in a way that impacts this document, this document will be construed to comply with the most recent governing laws, regulations, or court holdings.

This document does not create legally enforceable protections beyond the protections of the background federal and state laws that frame such policies and codes, generally.

These procedures are effective 08-01-2024.

APPENDIX A: DEFINITIONS

The following definitions apply to the nondiscrimination Policies and Procedures:

Advisor. Any person chosen by a party, or appointed by the institution, who may accompany the party to all meetings related to the Resolution Process and advise the party on that process.

Appeal Decision-maker. The person or panel who accepts or rejects a submitted appeal request, determines whether any of the appeal grounds are met, and directs responsive action(s), accordingly.

Complainant. A student or employee who is alleged to have been subjected to conduct that could constitute discrimination, harassment, retaliation, or Other Prohibited Conduct under the Policy; or a person other than a student or employee who is alleged to have been subjected to conduct that could constitute discrimination or harassment or under the Policy and who was participating or attempting to participate in the College's Education Program or Activity at the time of the alleged discrimination, harassment, retaliation, or Other Prohibited Conduct.

Complaint. An oral or written request to the College that can objectively be understood as a request for the College to investigate and make a determination about the alleged Policy violation(s).

Confidential Employee.

An employee whose communications are privileged or confidential under federal or state law. The employee's confidential status, for purposes of this definition, is only with respect to information received while the employee is functioning within the scope of their duties to which privilege or confidentiality applies; or

An employee whom the College has designated as confidential under this Policy for the purpose of providing services to persons related to discrimination, harassment, retaliation, or Other Prohibited Conduct. If the employee also has a duty not associated with providing those services, the employee's confidential status only applies with respect to information received about discrimination, harassment, retaliation, or Other Prohibited Conduct in connection with providing those services; or

An employee who is conducting an Institutional Review Board-approved human-subjects research study designed to gather information about discrimination, harassment, retaliation, or Other Prohibited

Conduct. The employee's confidential status only applies with respect to information received while conducting the study.

Coordinator. The person with primary responsibility for overseeing and enforcing the nondiscrimination Policies and Procedures. As used in these policies and procedures, the "Coordinator" also includes their designee(s).

Day. A business day when the College is in normal operation. All references in the Policy to days refer to business days unless specifically noted as calendar days.

Decision-maker. The person or panel who reviews evidence, determines relevance, and makes the Final Determination of whether Policy has been violated and/or assigns sanctions.

Education Program or Activity. Locations, events, or circumstances where the College exercises substantial control over the context in which the discrimination, harassment, retaliation, and/or Other Prohibited Conduct occurs and also includes any building owned or controlled by a student organization that the College officially recognizes.

Employee. A person employed by the College either full- or part-time, including student employees when acting within the scope of their employment.

Final Determination. A conclusion by the standard of proof that the alleged conduct did or did not violate Policy.

Finding. A conclusion by the standard of proof that the conduct did or did not occur as alleged (as in a "finding of fact").

Informal Resolution. A resolution agreed to by the Parties and approved by the Coordinator that occurs prior to a Final Determination in the Resolution Process.

Investigation Report. The Investigator's summary of all relevant evidence gathered during the investigation. Variations include the Draft Investigation Report and the Final Investigation Report.

Investigator. The person(s) authorized by the College to gather facts about an alleged violation of this Policy, assess relevance and credibility, synthesize the evidence, and compile this information into an Investigation Report.

Knowledge. When the College receives Notice of conduct that reasonably may constitute harassment, discrimination, retaliation, or Other Prohibited Conduct in its Education Program or Activity.

Mandated Reporter. A College employee who is obligated by Policy to share Knowledge, Notice, and/or reports of discrimination, harassment, retaliation, and/or Other Prohibited Conduct with the Coordinator.,

Nondiscrimination Team. The Coordinator, any deputy coordinators, and any member of the resolution process pool.

Notice. When an employee, student, or third party informs the Coordinator of the alleged occurrence of discriminatory, harassing, retaliatory, or Other Prohibited Conduct.

Parties. The Complainant(s) and Respondent(s), collectively.

Pregnancy or Related Conditions. Pregnancy, childbirth, termination of pregnancy, or lactation, medical conditions related thereto, or recovery therefrom.

Protected Characteristic. Any characteristic for which a person is afforded protection against discrimination and harassment by law or the College Policy.

Resolution Process. The investigation and resolution of allegations of prohibited conduct under this Policy, including Informal Resolution and Administrative Resolution

Respondent. A person who is alleged to have engaged in conduct that could constitute discrimination based on a protected characteristic, harassment, retaliation, or Other Prohibited Conduct for engaging in a protected activity under this Policy.

Sanction. A consequence imposed on a Respondent who is found to have violated this Policy.

Title IX Coordinator. At least one official designated by the College to ensure ultimate oversight of compliance with Title IX and the College's Title IX program. References to the Coordinator throughout the Policy may also encompass a designee of the Coordinator for specific tasks.

APPENDIX B: VIOLENCE RISK ASSESSMENT (VRA)

Threat assessment is the process of assessing the actionability of violence by a person against another person or group following the issuance of a direct or conditional threat. A Violence Risk Assessment (VRA) is a broader term used to describe assessment of any potential violence or danger, regardless of the presence of a vague, conditional, or direct threat.

Implementing a VRA requires specific training. It is typically conducted by psychologists, clinical counselors, social workers, case managers, law enforcement officers, student conduct professionals, and/or other Care Team members.

A VRA occurs in collaboration with the Care Team and must be understood as an ongoing process, rather than as a single evaluation or meeting. A VRA is not an evaluation for an involuntary behavioral health hospitalization (e.g., 5150 in California, Section XII in Massachusetts, Baker Act in Florida), nor is it a psychological or mental health assessment.

A VRA assesses the risk of actionable violence, often with a focus on targeted/predatory escalations. It is supported by research from law enforcement, criminology, human resources, and psychology.

When conducting a VRA, the assessor(s) use(s) an evidence-based process consisting of:

An appraisal of risk factors that escalate the potential for violence.

A determination of stabilizing influences, or protective factors, that reduce the risk of violence.

A contextual analysis of violence risk by considering environmental circumstances, hopelessness, and suicidality; catalyst events; nature and actionability of the threat; fixation and focus on target; grievance collection; and action and time imperative for violence.

The application of intervention and management approaches to reduce the risk of violence.

To assess a person's level of violence risk, the Coordinator will initiate the VRA process through the Care Team. The Care Team will assign a trained person(s) to perform the assessment, according to the specific nature of the complaint.

The assessor(s) will follow the process for conducting a VRA as outlined in the Care Team manual and will rely on a consistent, research-based, reliable system that allows for the evaluation of the risk levels.

Some examples of formalized approaches to the VRA process include The NABITA Risk Rubric, The Structured Interview for Violence Risk Assessment (SIVRA-35), Violence Risk Assessment of the

Written Word (VRAWW), Workplace Assessment of Violence Risk (WAVR-21), Historical Clinical Risk Management (HCR-20), and MOSAIC.

The VRA is conducted independently from the Resolution Process, informed by it, but free from outcome pressure. The person(s) conducting the assessment will be trained to mitigate any bias and provide the analysis and findings in a fair and equitable manner.

The Care Team member(s) conducts a VRA process and makes a recommendation to the Coordinator as to whether the VRA indicates there is a substantial, compelling, and/or imminent and serious threat to the health and/or safety of a person or the community.

In some circumstances, the Coordinator may determine that a VRA should be conducted by the Care Team as part of the initial evaluation of a Complaint under this Policy. A VRA can aid in critical and/or required determinations, including:

Whether to remove the Respondent on an emergency basis because of an immediate threat to a person or the community's health/safety (Emergency Removal)

Whether the Coordinator should pursue/initiate a Complaint absent a willing/able Complainant

Whether the scope of an investigation should include an incident, and/or pattern of misconduct, and/or climate of discrimination or harassment

To help identify potential predatory conduct

To help assess/identify grooming behaviors

Whether it is reasonable to try to resolve a Complaint through Informal Resolution, and if so, what approach may be most successful

Whether to impose transcript notation or communicate with a transfer institution about a Respondent

Assessment of appropriate sanctions/remedies (to be applied post-determination)

Whether a Clery Act Timely Warning/Trespass order/Persona Non Grata is needed

A compelling risk to health and/or safety may result from evidence of patterns of misconduct, predatory conduct, threats, abuse of minors, use of weapons, and/or violence. Institutions may be compelled to act on alleged employee misconduct irrespective of a Complainant's wishes.

APPENDIX C: UNETHICAL RELATIONSHIPS POLICY

Expectations Regarding Unethical Relationships

There are inherent risks in any romantic or sexual relationship between persons in unequal positions, such as faculty member-student or supervisor-employee. In reality, these relationships may be less consensual than perceived by the person whose position confers power or authority. Similarly, each of the Parties may view the relationship differently, particularly in retrospect. Circumstances may change, and once welcome conduct may become unwelcome at some point in the relationship.

Even when the Parties have initially consented to romantic or sexual involvement, the possibility of a later allegation of a relevant Policy violation still exists. The College does not wish to interfere with private choices regarding personal relationships when these relationships do not interfere with the College's goals and policies. However, for the personal protection of members of this community,

relationships in which power differentials are inherent (e.g., faculty-student, staff-student) are generally discouraged. They may also violate standards of professionalism and/or professional ethics.

Consensual romantic or sexual relationships in which one party maintains a direct supervisory or otherwise evaluative role over the other party are inherently problematic. Therefore, persons with direct supervisory or otherwise evaluative responsibilities who are involved in such relationships must promptly inform their supervisor and/or the Coordinator. The existence of this type of relationship will likely result in removing the supervisory or evaluative responsibilities from the employee or shifting a party from being supervised or evaluated by someone with whom they have established a consensual relationship. When an applicable relationship existed prior to adoption of this Policy or prior to employment, the duty to notify the appropriate supervisor still pertains.

This type of relationship includes Floor Governors and Housefellows and students for whom the Floor Governor and Housefellow has direct responsibility. While no relationships are specifically prohibited by this Policy, failure to timely self-report such relationships to a supervisor as required can result in disciplinary action for an employee. The Coordinator will determine whether to refer violations of this provision to Human Resources for resolution, or to pursue resolution under this Policy, based on the circumstances of the allegation.

APPENDIX D: PREGNANCY AND RELATED CONDITIONS AND PARENTING STUDENT POLICY

Non-Discrimination Statement

The College does not discriminate in its Education Program or Activity against any applicant for admission, student, applicant for employment, or employee on the basis of current, potential, or past pregnancy or related conditions as mandated by Title IX of the Education Amendments of 1972 (Title IX). The College prohibits members of the College community from adopting or implementing any policy, practice, or procedure which treats an applicant for admission, student, applicant for employment, or employee differently on the basis of current, potential, or past parental, family, or marital status. This policy and its pregnancy-related protections apply to all pregnant persons, regardless of gender identity or expression.

Definitions

Familial Status. The configuration of one's family or one's role in a family.

Marital Status. The state of being married or unmarried.

Parental Status. The status of a person who, with respect to another person who is under the age of 18, is a biological, adoptive, foster, or stepparent; a legal custodian or guardian; in loco parentis with respect to such a person; or actively seeking legal custody, guardianship, visitation, or adoption of such a person.

Pregnancy and Related Conditions. The full spectrum of processes and events connected with pregnancy, including pregnancy, childbirth, termination of pregnancy, or lactation; related medical conditions; and recovery therefrom.

Reasonable Modifications. Individualized modifications to the College's policies, practices, or procedures that do not fundamentally alter the College's Education Program or Activity.

Information Sharing Requirements

Any College employee who becomes aware of a student's pregnancy or related condition is required to provide the student with the Coordinator's contact information and communicate that the Coordinator can help take specific actions to prevent discrimination and ensure equal access to the College's Education Program and activity. If the employee has a reasonable belief that the Coordinator is already aware of the pregnancy or related condition, the employee is not required to provide the student with the Coordinator's contact information.

Upon notification of a student's pregnancy or related condition, the Coordinator will contact the student and inform the student of the College's obligations to:

- Prohibit sex discrimination.

- Provide reasonable modifications.

- Allow access, on a voluntary basis, to any separate and comparable portion of the institution's Education Program or Activity.

- Allow a voluntary leave of absence.

- Ensure lactation space availability.

- Maintain a Resolution Process for alleged discrimination.

- Treat pregnancy as comparable to other temporary medical conditions for medical benefit, service, plan, or policy purposes.

The Coordinator will also notify the student of the process to file a complaint for alleged discrimination, harassment, or retaliation, as applicable.

Reasonable Modifications for Students

Students who are pregnant or are experiencing related conditions are entitled to reasonable modifications to prevent sex discrimination and ensure equal access to the College's Education Program and activity. Any student seeking reasonable modifications must contact the Coordinator to discuss appropriate and available reasonable modifications based on their individual needs. Students are encouraged to request reasonable modifications as promptly as possible, although retroactive modifications may be available in some circumstances. Reasonable modifications are voluntary, and a student can accept or decline the offered reasonable modifications. Not all reasonable modifications are appropriate for all contexts.

Reasonable modifications may include:

Breaks during class to express breast milk, breastfeed, or attend to health needs associated with pregnancy or related conditions, including eating, drinking, or using the restroom

Intermittent absences to attend medical appointments

Access to online or homebound education

Changes in schedule or course sequence

Time extensions for coursework and rescheduling of tests and examinations

Allowing a student to sit or stand, or carry or keep water nearby

Counseling

Changes in physical space or supplies (for example, access to a larger desk or a footrest)

Elevator access

A larger uniform or other required clothing or equipment

Other changes to policies, practices, or procedures determined by the Coordinator

In situations such as clinical rotations, performances, labs, and group work, the College will work with the student to devise an alternative path to completion, if possible. In progressive curricular and/or cohort-model programs, medically necessary leaves are sufficient cause to permit the student to shift course order, substitute similar courses, or join a subsequent cohort when returning from leave. Students are encouraged to work with their faculty members and the College's support systems to devise a plan for how to best address the conditions as pregnancy progresses, anticipate the need for leaves, minimize the academic impact of their absence, and get back on track as efficiently and comfortably as possible. The Coordinator will assist with plan development and implementation as needed.

Supporting documentation for reasonable modifications will only be required when it is necessary and reasonable under the circumstances to determine which reasonable modifications to offer to determine other specific actions to take to ensure equal access.

Information about pregnant students' requests for modifications will be shared with faculty and staff only to the extent necessary to provide the reasonable modification.

Students experiencing pregnancy-related conditions that manifest as a temporary disability under the Americans with Disabilities Act (ADA) or Section 504 of the Rehabilitation Act are eligible for reasonable accommodations just like any other student with a temporary disability. The Coordinator will consult with disability staff to ensure the student receives reasonable accommodations for their disability as required by law.

Certification to Participate

All students should be informed of health and safety risks related to participation in academic and co-curricular activities, regardless of pregnancy status. A student may not be required to provide health care provider or other certification that the student is physically able to participate in the program or activity, unless:

The certified level of physical ability or health is necessary for participation;

The institution requires such certification of all students participating; and

The information obtained is not used as a basis for pregnancy-related discrimination.

Lactation Space Access

The College provides students and employees with access to lactation spaces that are functional, appropriate, and safe, including the Wellness Space located in Fanning Hall, Room 101C. Such spaces are regularly cleaned, shielded from view, and free from the intrusion of others.

Leaves of Absence

Students

Students are permitted to take a voluntary leave of absence for a reasonable time as deemed medically necessary by their healthcare provider because of pregnancy and/or the birth, adoption, or placement of a child. The leave term may be extended in the case of extenuating circumstances or medical necessity. While registered under that status, students who choose to take a leave of absence under this policy can elect to keep their health insurance coverage and continue residing in College housing, subject to the payment of applicable fees.

To the extent possible, the College will take reasonable steps to ensure that students who take a leave of absence or medical leave return to the same position of academic progress that they were in when they took leave, including access to the same or an equivalent course catalog that was in place when the leave began.

Continuation of students' scholarships, fellowships, or similar College-sponsored funding during the leave term will depend on student registration status and the policies of the funding program regarding registration status. Students will not be negatively impacted by or forfeit their future eligibility for their scholarship, fellowship, or similar Recipient-supported funding by exercising their rights under this policy.

The Title IX Office can and will advocate for students with respect to financial aid agencies and external scholarship providers in the event that a leave of absence places eligibility into question.

In order to initiate a leave of absence, the student must contact the Coordinator at least 30 calendar days prior to the initiation of leave, or as soon as practicable. The Coordinator will assist the student in completing any necessary paperwork.

Employees

Information on employment leave can be found in the Employee Handbook and IFF as applicable.

If an employee, including a student-employee, is not eligible for leave under the aforementioned leave policy because they either (1) do not have enough leave time available under that policy, or (2) have not been employed long enough to qualify for leave under that policy, they are eligible to qualify for pregnancy or related condition leave under Title IX. Pregnancy and related conditions will be regarded as a justification for a leave of absence without pay for a reasonable period of time.

Employees who take leave under Title IX must be reinstated to the status held when leave began or a comparable position without a negative effect on any employment privilege or right.

Student Parents

Students with child caretaking/parenting responsibilities who wish to remain engaged in their coursework while adjusting their academic responsibilities because of the birth or adoption of a child or placement of a foster child may request an academic modification period during the first three (3) months from the time the child entered the home. Extensions may be granted when additional time is required by medical necessity or extraordinary caretaking/parenting responsibilities.

During the modification period, the student's academic requirements will be adjusted and deadlines postponed as appropriate, in collaboration among the Title IX Office, the student's academic advisor, and the appropriate academic department(s).

Students seeking a period of modified academic responsibilities may consult with their academic advisor or with the Office of Equity and Compliance Programs to determine appropriate academic adjustment requests. The Office of Equity and Compliance Programs will communicate all requests under this policy to students' academic advisors and coordinate adjustment-related efforts with the advisors unless the student specifically requests that their advisors be excluded.

Students are encouraged to work with their advisors and faculty members to reschedule course assignments, lab hours, examinations, or other requirements, and/or to reduce their overall course load, as appropriate, once authorization is received from the Office of Equity and Compliance Programs.

If, for any reason, caretaking/parenting students are not able to work with their advisors/faculty members to obtain appropriate modifications, students should alert the Office of Equity and Compliance Programs as soon as possible, and the office will help facilitate needed accommodations and modifications.

In timed degree, certification, or credentialing programs, students who seek modifications upon the birth or placement of their child will be allowed an extension of up to three (3) months to prepare for and take preliminary and qualifying examinations, and an extension of up to three (3) months toward normative time to degree while in candidacy, to the extent those deadlines are controlled by the Recipient. Longer extensions may be granted in extenuating circumstances.

Students can request modified academic responsibilities under this Policy regardless of whether they elect to take a leave of absence.

While receiving academic modifications, students will remain registered and retain benefits accordingly.

College Housing

A pregnant student's College housing status will not be altered based on pregnancy status unless requested by the student.

Policy Dissemination and Training

A copy of this policy will be made available to faculty and employees in annually required training and posted on the College website. The College will alert all new students and employees about this policy and the location of this policy as part of orientation. The Office of Equity and Compliance Programs will make educational materials available to all members of the College community to promote compliance with this policy and familiarity with its procedures.

Crime Statistics

Note:

In the past three calendar years, there were no crimes reported that were investigated by local law enforcement agencies to be unfounded. There were no crimes reported at any non-campus locations.

Geography Definitions from the Clery Act:

On-Campus *defined as*: (1) Any building or property owned or controlled by an institution within the same reasonably contiguous geographic area and used by the institution in direct support of or in a manner related to the institution's educational purposes, including residence halls; and (2) Any building or property that is within or reasonably contiguous to the area identified in paragraph (1), that is owned by the institution but controlled by another person, is frequently used by students and supports institutional purposes (such as a food or retail vendor). Non-Campus Building or Property *defined as*: (1) Any building or property owned or controlled by a student organization that is officially recognized by the institution (i.e. privately owned fraternity); or (2) Any building or property owned or controlled by an institution that is used in direct support of or in relation to the institution's educational purposes, is frequently used by students, and is not within the same reasonably contiguous geographic area of the institution.

The Non-Campus geography definition includes buildings or properties under temporary control during institutionally sponsored short-stay-away domestic or international trips for students of more than one night or buildings or properties under temporary control during institutionally sponsored domestic or international trips for students to repeated locations: • For example, students in the debate club take a trip to Washington, D.C. and stay at the same hotel every year. In this example, the institution must include in their Clery Act crime statistics any Clery Act crimes that occur in the rooms used by the students and any common areas used to access those rooms; including the lobby, elevator and staircases.

Public Property *defined as*: All public property, including thoroughfares, streets, sidewalks, and parking facilities, that is within the campus or immediately adjacent to and accessible from the campus or on-campus property/facilities. The Gettysburg College crime statistics do not include crimes that occur in privately-owned homes or businesses within or adjacent to the campus boundaries.

On-campus Student Housing Facility *defined as*: Any student housing facility that is owned or controlled by the institution, or is located on property that is owned or controlled by the institution, and

is within the reasonably contiguous geographic area that makes up the campus is considered an on-campus student housing facility. This category is considered a subset of the On-Campus category.

Reasonably Contiguous is defined in the 2016 Handbook for Campus Safety and Security Reporting as follows: Refers to a building or property an institution owns or controls that is in a location that students consider to be and treat as part of the ‘campus.’ Generally speaking, it is reasonable to consider locations within one mile from the core or main campus border to be reasonable contiguous with the

Clery-Designated Crime Definitions

Connecticut College is required to report crime statistics as defined by the Clery Act for the following crimes if the crimes are reported and occur in geographic locations.

Unfounded Crime Reports – According to Uniform Crime Report (UCR) guidelines, a reported offense can be cleared as unfounded by a sworn law enforcement authority “if the investigation shows that no offense occurred nor was attempted.” These cases thus remain as official crime reports and are included in the departmental statistics; however, they are explicitly labeled as “unfounded” cases within UCR reports on the various index crimes. According to UCR guidelines, the statistics on unfounded cases should include crime reports that are either: False or Baseless.

Murder/Non-Negligent Manslaughter – The killing of one human being by another.

Manslaughter by Negligence – The killing of another person through gross negligence.

The Federal definition (from VAWA) of **Sexual Assault**: An offense that meets the definition of rape, fondling, incest, or statutory rape as used in the FBI’s Uniform Crime Reporting (UCR) program. Per the National Incident-Based Reporting System User Manual from the FBI UCR Program, a sex offense is “any sexual act directed against another person, without the consent of the victim, including instances where the victim is incapable of giving consent.”

- **Rape**: The penetration, no matter how slight, of the vagina or anus with any body part or object, or oral penetration by a sex organ of another person, without the consent of the victim. This definition includes any gender of victim or perpetrator.
- **Fondling**: The touching of the private parts of another person for the purpose of sexual gratification, without the consent of the victim, including instances where the victim is incapable of giving consent because of his/her age or because of his/her temporary or permanent mental incapacity.
- **Incest**: Non-forcible sexual intercourse between persons who are related to each other within the degrees wherein marriage is prohibited by law.
- **Statutory Rape**: Non-forcible sexual intercourse with a person who is under the statutory age of consent.

Robbery – The taking or attempting to take anything of value from the care, custody, or control of a person or persons by force or threat of force or violence and/or by putting the victim in fear.

Aggravated Assault – An unlawful attack by one person upon another for the purpose of inflicting severe or aggravated bodily injury. This type of assault usually is accompanied by the use of a weapon or by means likely to produce death or great bodily harm.

Burglary – The unlawful entry of a structure to commit a felony or a theft.

Motor Vehicle Theft – The theft or attempted theft of a vehicle.

Arson – Any willful or malicious burning or attempt to burn, with or without intent to defraud, a dwelling house, public building, motor vehicle or aircraft, or personal property of another.

Domestic Violence, Dating Violence, and Stalking additions from the 2014 VAWA Negotiated Rulemaking Final Consensus Language:

The Federal definition (from VAWA) of **Domestic Violence**: a felony or misdemeanor crime of violence committed:

- by a current or former spouse or intimate partner of the victim;
- by a person with whom the victim shares a child in common;
- by a person who is cohabitating with, or has cohabitated with, the victim as a spouse of intimate partner;
- by a person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction in which the crime of violence occurred; or
- by any other person against an adult or youth victim who is protected from that person's acts under the domestic or family violence laws of the jurisdiction in which the crime of violence occurred.

The Federal definition (from VAWA) of **Dating Violence**: violence committed by a person:

- who is or has been in a social relationship of a romantic or intimate nature with the victim; and
 - The existence of such a relationship shall be determined based on the reporting party's statement with consideration of:
 - the length of the relationship;
 - the type of relationship;
 - the frequency of interaction between the persons involved in the relationship
- for the purposes of this definition –
 - Dating Violence includes, but is not limited to, sexual or physical abuse or the threat of such abuse.
 - Dating Violence does not include acts covered under the definition of domestic violence
- For the purpose of complying with the requirement of this section and § 668.41, any incident meeting this definition is considered a crime for the purposes of Clery Act reporting.

The Federal definition (from VAWA) of **Sexual Assault**: An offense that meets the definition of rape, fondling, incest, or statutory rape as used in the FBI's Uniform Crime Reporting (UCR) program. Per the National Incident-Based Reporting System User Manual from the FBI UCR Program, a **sex offense** is "any sexual act directed against another person, without the consent of the victim, including instances where the victim is incapable of giving consent."

- *Rape*: The penetration, no matter how slight, of the vagina or anus with any body part or object or oral penetration by a sex organ of another person, without the consent of the victim.
- *Fondling*: The touching of the private parts of another person for the purpose of sexual gratification, without the consent of the victim, including instances where the victim is incapable of giving consent because of his/her age or because of his/her temporary or permanent mental incapacity.
- *Incest*: Sexual intercourse between persons who are related to each other within the degrees wherein marriage is prohibited by law.
- *Statutory Rape*: Sexual intercourse with a person who is under the statutory age of consent.

The Federal definition (from VAWA) of **Stalking**: engaging in a course of conduct directed at a specific person that would cause a reasonable person to:

- Fear for the person's safety or the safety of others; or
- Suffer substantial emotional distress

For the purposes of this definition:

- Course of conduct means two or more acts, including, but not limited to, acts which the stalker directly, indirectly, or through third parties, by any action, method, device, or means follows, monitors, observes, surveils, threatens, or communicates to or about, a person, or interferes with a person's property.
- Reasonable person means a reasonable person under similar circumstances and with similar identities to the victim
- Substantial emotional distress means significant mental suffering or anguish that may, but does not necessarily, require medical or other professional treatment or counseling.

Hate Crimes – any of the above offenses, and any other crime involving bodily injury, reported to local police agencies or Campus Security Authority that manifest evidence that the victim was intentionally selected because of the perpetrator's bias, or the perpetrator perceived the person to be in one of the protected group categories. Additionally, on August 14, 2008, the Clery Act was amended to include *larceny/simple assault, intimidation, and destruction/damage/vandalism (except arson)* as reportable categories of hate crimes.

- *Simple Assault*: An unlawful physical attack by one person upon another where neither the offender displays a weapon, nor the victim suffers obvious severe or aggravated bodily injury involving apparent broken bone, loss of teeth, possible internal injury, severe laceration, or loss of consciousness.
- *Destruction / Damage / Vandalism of Property*: To willfully or maliciously destroy, damage, deface or otherwise injure real or personal property without the consent of the owner or the person having custody or control over it.
- *Larceny / Theft*: The unlawful taking, carrying, leading or riding away of property from the possession or constructive possession of another person.
- *Intimidation*: To unlawfully place another person in reasonable fear of bodily harm through the use of threatening words and/or other conduct, but without displaying a weapon or subjecting the victim to physical attack.

These new reporting categories are only reported if motivated by bias as determined by one of the designated bias categories. The types of bias categories include: *race, gender, religion, sexual orientation, ethnicity, national origin, gender identity, and disability.*

- *Race:* A preformed negative opinion or attitude toward a group of persons who possess common physical characteristics
- *Religion:* A preformed negative opinion or attitude toward a group of persons who share the same religious beliefs regarding the origin and purpose of the universe and the existence or nonexistence of a supreme being.
- *Sexual Orientation:* A preformed negative opinion or attitude toward a group of persons based on their actual or perceived sexual orientation.
- *Gender:* A preformed negative opinion or attitude toward a person or group of persons based on their actual or perceived gender.
- *Gender Identity:* A preformed negative opinion or attitude toward a person or group of persons based on their actual or perceived gender identity
- *Ethnicity:* A preformed negative opinion or attitude toward a group of people whose members identify with each other, through a common heritage, often consisting of a common language, common culture (often including a shared religion) and/or ideology that stresses common ancestry.
- *National Origin:* A preformed negative opinion or attitude toward a group of people based on their actual or perceived country of birth.
- *Disability:* A preformed negative opinion or attitude toward a group of persons based on their physical or mental impairments, whether such disability is temporary or permanent, congenital, or acquired by heredity, accident, injury, advanced age or illness.

Hate Crime Definitions:

To ensure uniformity in reporting nationwide, the following definitions have been adopted for use in hate crime reporting:

Bias – a preformed negative opinion or attitude toward a group of persons based on their race, religion, disability, sexual orientation, or ethnicity/national origin.

Bias Crime – a criminal offense committed against a person or property that is motivated, in whole or in part, by the offender’s bias against a race, religion, disability, sexual orientation, or ethnicity/national origin; also known as Hate Crime.

Note: Even if the offender was mistaken in their perception that the victim was a member of the group the offender was acting against, the offense is still a bias crime because the offender was motivated by bias against the group

Uniform Crime Reporting (UCR) / National Incident-Based Reporting System (NIBRS) Definitions

The Uniform Crime Reporting (UCR) program divides offenses into two groups, Part I and Part II crimes.

The Part I Offenses are:

Criminal Homicide –

- A. **Murder and Non-negligent manslaughter:** the willful (non-negligent) killing of one human being by another. Deaths caused by negligence, attempts to kill, assaults to kill, suicides, and accidental deaths are excluded. The program classifies justifiable homicides separately and limits the definition to:
 - (1) the killing of a felon by a law enforcement officer in the line of duty; or
 - (2) the killing of a felon, during the commission of a felony, by a private citizen
- B. **Manslaughter by negligence:** the killing of another person through gross negligence. Traffic fatalities are excluded.

Rape – Penetration, no matter how slight, of the vagina or anus with any body part or object, or oral penetration by a sex organ of another person, without the consent of the victim. Statutory offenses (no force used —victim under age of consent) are excluded.

Robbery – The taking or attempted taking of anything of value from the care, custody, or control of a person or persons by force or threat of force or violence and/or by putting the victim in fear.

Aggravated Assault – An unlawful attack by one person upon another for the purpose of inflicting severe or aggravated bodily injury. This type of assault usually is accompanied by the use of a weapon or by means likely to produce death or great bodily harm. Simple assaults are excluded.

Burglary (Breaking or Entering) – The unlawful entry of a structure to commit a felony or a theft. Attempted forcible entry is included.

Larceny - Theft (except Motor Vehicle Theft) – The unlawful taking, carrying, leading, or riding away of property from the possession or constructive possession of another. Examples are thefts of bicycles or automobile accessories, shoplifting, pocket-picking, or the stealing of any property or article that is not taken by force and violence or by fraud. Attempted larcenies are included. Embezzlement, confidence games, forgery, worthless checks, etc., are excluded.

Motor Vehicle Theft – The theft or attempted theft of a motor vehicle. A motor vehicle is self-propelled and runs on land surface and not on rails. Motorboats, construction equipment, airplanes, and farming equipment are specifically excluded from this category.

Arson – Any willful or malicious burning or attempt to burn, with or without intent to defraud, a dwelling house, public building, motor vehicle or aircraft, personal property of another, etc.

The Part II Offenses are:

Other Assaults (Simple) – Assaults and attempted assaults which are not of an aggravated nature and do not result in serious injury to the victim. Includes subjecting a person to unlawful physical attack or in fear of bodily harm by word or action.

Vandalism – To willfully or maliciously destroy, injure, disfigure, or deface any public or private property, real or personal, without the consent of the owner or person having custody or control by

cutting, tearing, breaking, marking, painting, drawing, covering with filth, or any other such means as may be specified by local law. Attempts are included.

Sex offenses (except forcible rape, prostitution, and commercialized vice) —Statutory rape, offenses against chastity, common decency, morals, and the like. Includes the offense of Fondling. Attempts are included.

Weapon Law Violations: The violation of laws or ordinances prohibiting the manufacture, sale, purchase, transportation, possession, concealment, or use of firearms, cutting instruments, explosives, incendiary devices or other deadly weapons. This classification encompasses weapons offenses that are regulatory in nature. Include in classifications: manufacture, sale, or possession of deadly weapons; carrying deadly weapons, concealed or openly; using manufacturing, etc., of silencers; furnishing deadly weapons to minors; aliens possessing deadly weapons; and attempts to commit all of the above.

Drug Abuse Violations: Violation of state and local laws relating to the unlawful possession, sale, use growing, manufacturing, and making of narcotic drugs. The relevant substances include: opium or cocaine, and their derivatives (morphine, heroin, codeine); marijuana; synthetic narcotics (Demerol and methadone); and dangerous non-narcotic drugs (barbiturates and Benzedrine).

Liquor Law Violations: The violation of laws or ordinances prohibiting: the manufacture, sale, transporting, furnishing, possessing of intoxicating liquor; maintaining unlawful drinking places; bootlegging, and operating a still; furnishing liquor to a minor or intemperate person; using a vehicle for illegal transportation of liquor; drinking on a train or public conveyance; and all attempts to commit any of the aforementioned.

Missing Student Inquiry and Confidential Contact Information

The College has established a procedure to investigate when a student is reported missing. Each student has the option to designate a confidential contact by submitting a form to the Dean of Students Office. The contact information will be confidential, accessible only by authorized campus officials and law enforcement, and may not be disclosed outside of a missing persons investigation. Individuals should immediately report a missing student to the Department of Campus Safety or dial 911.

All missing student reports must be referred immediately to the Department of Campus Safety at (860) 439-2222 or internal extension 2222. The Department of Campus Safety will generate a Missing Person report and initiate an investigation. After investigating the Missing Person report, should the Department of Campus Safety determine that the student is missing and has been missing for more than 24 hours (regardless of whether the student has identified a contact person, is above the age of 18, or is an emancipated minor), the Department of Campus Safety will notify the New London Police Department or law enforcement authority with jurisdiction and the student's emergency contact no later than 24 hours after the student is determined to be missing, unless the local law enforcement agency was the entity that made the determination that the student was missing.

If the missing person is under the age of 18 and is not an emancipated individual, the Department of Campus Safety will notify the student's custodial parent or legal guardian, the missing person contact, and the local law enforcement with jurisdiction immediately after it has determined that the student has

been missing for more than 24 hours, in addition to notifying any additional contact person designated by the student.

The College will implement these procedures in less than 24 hours if circumstances warrant a faster implementation.

CRIME STATISTICS TABLES			
RESIDENCE HALLS AND STUDENT HOUSING CRIME STATISTICS			
CALENDAR YEAR->	2021	2022	2023
Murder (Non-Negligent Manslaughter)	0	0	0
Negligent Manslaughter	0	0	0
Rape	10	7	7
Fondling	2	0	6
Incest	0	0	0
Statutory Rape	0	0	0
Robbery	0	0	0
Aggravated Assault	0	0	0
Burglary	7	5	0
Motor Vehicle Theft	0	1	0
Arson	0	1	0

VAWA CRIME STATISTICS			
RESIDENCE HALLS AND STUDENT HOUSING CRIME STATISTICS			
Calendar Year ->	2021	2022	2023
Domestic Violence	0	0	0
Dating Violence	1	2	6
Stalking	1	2	1

LIQUOR, DRUG, AND WEAPONS LAW VIOLATIONS			
RESIDENCE HALLS AND STUDENT HOUSING STATISTICS			
CALENDAR YEAR->	2021	2022	2023
Liquor Law Violations - Referrals	40	74	119
Liquor Law Violations - Arrests	0	0	0
Drug Law Violations - Referrals	24	27	60
Drug Law Violations – Arrests	0	0	0
Weapons Law Violations - Referrals	2	0	0
Weapons Law Violations - Arrests	0	0	0

CRIME STATISTICS TABLES			
TOTAL OF ON CAMPUS PROPERTY WITHIN THE SAME REASONABLY CONTIGUOUS AREA OF THE INSTITUTION <u>AND</u> RESIDENCE HALLS AND STUDENT HOUSING CRIME STATISTICS			
CALENDAR YEAR->	2021	2022	2023
Murder (Non-Negligent Manslaughter)	0	0	0
Negligent Manslaughter	0	0	0
Rape	10	7	1
Fondling	2	0	0
Incest	0	0	0
Statutory Rape	0	0	0
Robbery	1	0	0
Aggravated Assault	0	0	0
Burglary	3	7	1
Motor Vehicle Theft	0	0	0
Arson	0	0	0

VAWA CRIME STATISTICS			
TOTAL OF ON CAMPUS PROPERTY WITHIN THE SAME REASONABLY CONTIGUOUS AREA OF THE INSTITUTION <u>AND</u> RESIDENCE HALLS AND STUDENT HOUSING CRIME STATISTICS			
Calendar Year ->	2021	2022	2023
Domestic Violence	0	0	0
Dating Violence	1	2	6
Stalking	1	2	1

LIQUOR, DRUG AND WEAPONS LAW VIOLATIONS			
TOTAL OF ON CAMPUS PROPERTY WITHIN THE SAME REASONABLY CONTIGUOUS AREA OF INSTITUTION <u>AND</u> RESIDENCE HALLS AND STUDENT HOUSING STATISTICS			
CALENDAR YEAR	2021	2022	2023
Liquor Law Violations - Referrals	40	74	61
Liquor Law Violations - Arrests	0	0	0
Drug Law Violations - Referrals	24	27	17
Drug Law Violations – Arrests	0	0	0
Weapons Law Violations - Referrals	0	0	0
Weapons Law Violations - Arrests	1	0	0

CRIME STATISTICS TABLES			
PUBLIC PROPERTY			
STREETS, SIDEWALKS, LOTS ADJACENT TO CAMPUS			
CALENDAR YEAR->	2021	2022	2023
Murder (Non-Negligent Manslaughter)	0	0	0
Negligent Manslaughter	0	0	0
Rape	0	0	0
Fondling	0	0	0
Incest	0	0	0
Statutory Rape	0	0	0
Robbery	0	0	0
Aggravated Assault	0	0	0
Burglary	0	0	1
Motor Vehicle Theft	0	0	0
Arson	0	0	0

VAWA CRIME STATISTICS			
PUBLIC PROPERTY			
STREETS, SIDEWALKS, LOTS ADJACENT TO CAMPUS			
Calendar Year->	2021	2022	2023
Domestic Violence	0	0	0
Dating Violence	2	0	0
Stalking	0	0	0

LIQUOR, DRUG, AND WEAPONS LAW VIOLATIONS			
PUBLIC PROPERTY			
STREETS, SIDEWALKS, LOTS – ADJACENT TO CAMPUS			
CALENDAR YEAR->	2021	2022	2023
Liquor Law Violations - Referrals	0	0	0
Liquor Law Violations - Arrests	0	1	0
Drug Law Violations - Referrals	0	0	0
Drug Law Violations – Arrests	0	0	0
Weapons Law Violations - Referrals	0	0	0
Weapons Law Violations - Arrests	0	0	0

HATE CRIMES IN RESIDENCE HALLS AND STUDENT HOUSING

CLERY REPORTABLE CRIME OFFENSES	GENDER			RACE			RELIGION			SEXUAL ORIENTATION			ETHNICITY			DISABILITY			NATIONAL ORIGIN			GENDER IDENTITY		
	1	2	3	1	2	3	1	2	3	1	2	3	1	2	3	1	2	3	1	2	3	1	2	3
CALENDAR YEAR	2021	2022	2023	2021	2022	2023	2021	2022	2023	2021	2022	2023	2021	2022	2023	2021	2022	2023	2021	2022	2023	2021	2022	2023
Murder–Non-negligent Manslaughter	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Negligent Manslaughter	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Rape	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Fondling	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Incest	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Statutory Rape	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Robbery	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Aggravated Assault	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Burglary	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Motor Vehicle Theft	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Arson	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Other Crimes Involving Bodily Injury	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Simple Assault	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Intimidation	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Larceny / Theft	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Destruction of Property	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

**HATE CRIMES ON CAMPUS PROPERTY WITHIN THE SAME REASONABLY
CONTIGUOUS AREA OF INSTITUTION AND RESIDENCE HALLS AND STUDENT
HOUSING**

CLERY REPORTABLE CRIME OFFENSES	GENDE R			RACE			RELIGI ON			SEXUAL ORIENT ATION			ETHNI CITY			DISABI LITY			NATIO NAL ORIGI N			GENDE R IDENTI TY		
	2 0 1 1	2 2 2	2 0 3	2 0 1	2 0 2	2 0 3	2 0 1	2 0 2	2 0 3	2 0 1	2 0 2	2 0 3	2 0 1	2 0 2	2 0 3	2 0 1	2 0 2	2 0 3	2 0 1	2 0 2	2 0 3	2 0 1	2 0 2	2 0 3
CALENDAR YEAR	2 0 1 1	2 2 2	2 0 3	2 0 1	2 0 2	2 0 3	2 0 1	2 0 2	2 0 3	2 0 1	2 0 2	2 0 3	2 0 1	2 0 2	2 0 3	2 0 1	2 0 2	2 0 3	2 0 1	2 0 2	2 0 3	2 0 1	2 0 2	2 0 3
Murder-Non-negligent Manslaughter	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Negligent Manslaughter	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Rape	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Fondling	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Incest	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Statutory Rape	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Robbery	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Aggravated Assault	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Burglary	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Motor Vehicle Theft	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Arson	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Other Crimes Involving Bodily Injury	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Simple Assault	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Intimidation	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Larceny / Theft	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Destruction of Property	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

**HATE CRIMES ON PUBLIC PROPERTY
STREETS, SIDEWALKS AND LOTS – ADJACENT TO CAMPUS**

CLERY REPORTABLE CRIME OFFENSES	GENDE R			RACE			RELIGI ON			SEXUAL ORIENT ATION			ETHNI CITY			DISABI LITY			NATIO NAL ORIGI N			GENDE R IDENTI TY		
	2021	2022	2023	2021	2022	2023	2021	2022	2023	2021	2022	2023	2021	2022	2023	2021	2022	2023	2021	2022	2023	2021	2022	2023
CALENDAR YEAR	2021	2022	2023	2021	2022	2023	2021	2022	2023	2021	2022	2023	2021	2022	2023	2021	2022	2023	2021	2022	2023	2021	2022	2023
Murder–Non-negligent Manslaughter	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Negligent Manslaughter	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Rape	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Fondling	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Incest	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Statutory Rape	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Robbery	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Aggravated Assault	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Burglary	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Motor Vehicle Theft	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Arson	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Other Crimes Involving Bodily Injury	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Simple Assault	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Intimidation	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Larceny / Theft	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Destruction of Property	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0