



CONNECTICUT COLLEGE

VAWA BROCHURE

INTRODUCTION

If you've tried to read Connecticut College's procedures for addressing sexual offenses ([the Equal Opportunity, Harassment and Nondiscrimination Policy](#)), it can be a challenge to understand some of their complexity. This guide is intended to help explain Connecticut College's responsibility under Title IX and the Violence Against Women Act (VAWA). Additionally, this guide will:

- provide you with specific resources available both on and off campus
- provide you with details on available supportive measures
- educate you on your right to an Advisor and how they can assist you throughout the process
- inform you of policy definitions that describe prohibited conduct
- inform you of possible sanctions for policy violations
- provide you with common questions and answers asked by parties (Complainants and Respondents)

IF YOU HAVE EXPERIENCED SEXUAL MISCONDUCT

If you are off campus and experiencing an emergency, you can call local police by dialing 911. You may also call the local New London police department's non-emergency line at 860-447-5269 ext. 0 or the Waterford police department's non-emergency line at 860-442-9451.

1. Go to a safe location as soon as you are able. If there is any immediate danger, contact [Campus Safety](#) if you are on campus or call 911 if you are off campus.
2. Seek immediate medical attention if you are injured, believe you may have been exposed to the risk of an STI/STD, or pregnancy.
3. Contact any of the following for immediate assistance on campus:
 - a. Title IX Coordinator at 860-439-2624. Regular business hours, M-F.
 - b. [Campus Safety](#), at 860-439-2222. 24 hours/7 days a week
 - c. [Student Health Services](#), at 860-439-2275. Regular business hours, M-F
 - d. [Student Counseling Services](#), at 860-439-4587. Regular business hours, M-F. After-hours services are available by calling 860-439-4587 and pressing option 2.
 - e. The Office of [Sexual Violence Prevention and Advocacy](#)
4. **Medical Attention:** Evidence collection should be completed within approximately 120 hours of an assault, but fluids, hair samples and DNA can be collected for a long time thereafter. Even if you have washed or bathed, evidence can often still be obtained. After 120 hours, it may still be helpful

to have medical attention, even if you are not trying to obtain evidence of an assault. Sexual assault nurse examiners are trained in the collection of forensic evidence and can check for injuries and exposure to sexually transmitted infections and diseases. If you are still wearing any clothes worn during the incident, wear them to the hospital, but bring a change of clothes, as the hospital will keep the clothes you are wearing as evidence. If you have changed clothes, bring the ones you were wearing during the incident to the hospital in a clean paper (not plastic) bag or wrapped in a clean bedsheet. Leave sheets/towels at the scene of the incident. Police will collect them. Typically, police will be called to the hospital to take custody of the forensic kit, but it is up to you whether you wish to speak with them or file a criminal complaint. The local hospital is [Lawrence and Memorial Hospital](#), 365 Montauk Avenue, New London, CT 06320, (860) 442-0711 (ask for the Emergency Room). Student Health Services (during business hours), the director of sexual violence prevention and advocacy or the administrator on-call (after hours) can provide you with support and arrange for transportation to the hospital. The hospital will arrange for a specific medical examination at no charge or can work with you to arrange state reimbursement.

5. **Preservation of Evidence:** In addition to seeking medical attention, there are other steps you can take to preserve evidence. If you have physical injuries, photograph or have them photographed, with a date stamp on the photo. Record the names of any witnesses and their contact information. This information may be helpful as proof of a crime, to obtain an order of protection, or to offer proof of a campus policy violation. Try to memorize details (e.g., physical description, names, license plate number, car description, etc.), or even better, write notes to remind you of details, if you have time and the ability to do so.

Choose how to proceed. You have options. You can: (1) do nothing until you are ready, (2) pursue resolution by the College, and/or (3) initiate criminal proceedings, and/or 4) initiate a civil process against the perpetrator. You may pursue whichever combination of options is best for you. If you pursue resolution by the College, your options can include a formal response, informal resolution, and/or supportive measures. If you wish to have an incident investigated and resolved by the College, students should contact the Title IX Coordinator. Employees should contact either Human Resources or the Title IX Coordinator. Connecticut College procedures will be explained and are summarized below.

A student wishing to report an incident of sexual assault, stalking, dating violence, or domestic violence may also do so by:

1. Filing a complaint with, or giving verbal notice to, the Title IX Coordinator, deputies or Officials with Authority (see contact information in the Equal Opportunity, Harassment and Nondiscrimination Policy. Such a report may be made at any time (including during non-business hours) by using the telephone number email address, or by mail to the office address, listed for the Title IX Coordinator or any other official listed.
2. Reporting online, using the reporting form posted at [Honor Code Violation Incident Reporting](#) or [Discrimination, Harassment and Sexual Misconduct Reporting Form](#).
3. Giving verbal or written notice of the incident to a campus security authority, as defined on Page 7 of the College's [Annual Security Report](#).

Those who wish incidents to be handled criminally should contact [Campus Safety](#) and have the right to be assisted by the College in doing so. It is the policy of the College not to notify local/campus authorities when dating violence, domestic violence, sexual assault, or stalking occurs, unless you wish to have the information shared or there is a health or safety emergency that requires disclosure.

CONFIDENTIALITY

To make informed choices, all parties should be aware of confidentiality and privacy considerations, as well as institutional mandatory reporting requirements.

Confidential Reporting: 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, 860439-2450, 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, ccampbel1@conncoll.edu
- Director of Gender and Sexuality Programs, Justin Mendillo, jmendill@conncoll.edu

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.

In addition, local resources such as crisis centers are also confidential and have no duty to report disclosed information to the College.

- Off-campus (non-employees):
 - [Safe Futures](#), at 1-860-701-6000. 24 hours/7 days a week confidential hotline
 - [RAINN](#), at 1-800-656-4673 or <https://hotline.rainn.org/online>. 24 hours/7 days a week confidential telephone and online hotline

- [National Domestic Violence Hotline](https://www.thehotline.org/what-is-live-chat/), at 1-800-799-7233 or <https://www.thehotline.org/what-is-live-chat/>. 24 hours/7 days a week confidential telephone and online hotline
- [CT Coalition Against Sexual Assault](#), at 1-888-999-5545. 24 hours/7 days a week confidential hotline
- [CT Coalition Against Domestic Violence](#), at 1-888-774-2900. 24 hours/7 days a week confidential hotline
- Licensed professional counselors and other medical providers
- Local or state assistance agencies
- Clergy/Chaplains
- Attorneys

Mandated Reporting: 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 of the Equal Opportunity, Harassment and Nondiscrimination Policy, including discrimination, harassment, retaliation and/or Other Prohibited Conduct, 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 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 makes 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
- Other actions deemed appropriate by the Title IX Coordinator

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.

You may request that the Title IX Coordinator provide you with supportive measures and resources without initiating a formal resolution process. If you wish to pursue a formal resolution process, the Title IX Coordinator will be unable to honor any request for confidentiality. The Respondent must be provided sufficient information, including the identity of the Complainant, to allow them to appropriately respond.

If the College decides it is obligated to pursue formal resolution based on the notice you have given, the Title IX Coordinator can initiate a complaint. You are not obligated to participate in the resolution process as a Complainant, or you could participate as a witness, instead. Regardless of whether you participate, you will have all the rights to which a Complainant is entitled, if you want them. The ability of the College to enforce its policies may be limited if you decide not to participate at all.

Duties with respect to minors (those under age 18) may require reporting to state agencies and/or local law enforcement. As a result, confidentiality cannot be guaranteed.

Protective Orders

Protective orders, restraining orders, injunctions, or similar lawful orders may be obtained through the court system and can be enforced by the Connecticut College Campus Safety Office and law enforcement authorities. If you obtain external orders of protection (e.g., restraining orders, injunctions, protection from abuse), please notify Campus Safety or the campus Title IX Coordinator as soon as possible following the issuance so that those orders can be observed on campus. The Coordinator, Deputies or Confidential Advocates can also assist students who wish to obtain protective or restraining orders from local authorities. The information regarding how to obtain a protection order, contact Campus Safety (860-439-2222).

SEXUAL MISCONDUCT: RISK REDUCTION FOR INTIMATE PARTNER VIOLENCE, STALKING, SEXUAL HARASSMENT, AND SEXUAL ASSAULT

While victim-blaming is never appropriate and Connecticut College fully recognizes that only those who commit sexual offenses are responsible for their actions, the College provides the suggestions that follow to help members of the campus community reduce their risk of being victimized and their risk of committing sexual offenses.

REDUCING THE RISK OF VICTIMIZATION

- Make any limits and/or boundaries you may have known as early as possible.
- Tell a sexual aggressor “no,” as clearly and firmly as possible.
- Remove yourself, if possible, from an aggressor’s physical presence.
- Reach out for help, either from someone who is physically nearby or by calling someone. Bystanders around you may be waiting for a signal that you need help.
- Take affirmative responsibility for your alcohol and/or drug consumption, understanding that alcohol and drugs can increase your vulnerability to sexual victimization.
- Look out for your friends and ask them to look out for you. Respect them, and ask them to respect you, but be willing to challenge each other about high-risk choices.

REDUCE THE RISK OF BEING ACCUSED OF A SEX OFFENSE

- Show your potential partner respect if you are in a position of initiating sexual behavior.
- If they say “no,” accept it and don’t push. If you want a yes, ask for it, and don’t proceed without clear permission.
- Communicate your intentions to your potential sexual partner clearly and give that person a chance to share their intentions and/or boundaries with you.
- Respect personal boundaries. If you are unsure what’s okay in any interaction, ask.
- Avoid ambiguity. Just ask. Don’t make assumptions about consent, about whether someone is attracted to you, how far you can go with that person, or if the individual is physically and mentally able to consent. If you have questions or are unclear, you *don’t* have consent.
- Don’t take advantage of the fact that someone may be under the influence of drugs or alcohol, even if that person chose to become that way. Their loss of control does not put you in control.
- Be on the lookout for mixed messages. That should be a clear indication to stop and talk about what your potential partner wants or doesn’t want to happen. They may be undecided about how far to go with you, or you may have misread a previous signal.
- Respect the timeline for sexual behaviors with which others are comfortable and understand that everyone is entitled to change their minds.
- Recognize that even if you don’t think you are intimidating in any way, your potential partner may be intimidated by or fearful of you, perhaps because of your sex, physical size, or a position of power or authority you may hold.
- Do not assume that someone’s silence or passivity is an indication of consent. Pay attention to both verbal and non-verbal signals to avoid misreading intentions.
- Understand that consent to one type of sexual behavior does not automatically grant you consent to other types of sexual behaviors. If you are unsure, stop and ask.
- If your partner indicates a need to stop, or withdraws consent, respect them. Immediately.

- If you've had consent with your partner previously, still check in with them. Just because something was okay with them before doesn't mean it will be okay in the future.
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WHEN DOES TITLE IX APPLY?

This Equal Opportunity, Harassment and Nondiscrimination 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. The 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.

If it is unclear whether Title IX and the Equal Opportunity, Harassment and Nondiscrimination Policy applies to your situation, contact the Title IX Coordinator for additional assistance. If Title IX does not apply to your situation, the conduct may still be addressable under other College policies.

A BRIEF HISTORY OF VAWA

The Violence Against Women Act §304. VAWA was originally enacted in 1994 to address concerns with violent crimes and violence against women. The goals of VAWA are to prevent violent crimes, respond to the needs of crime victims, learn more about crime, and change public attitudes through a collaborative effort made by a variety of organizations and systems. In 2013, President Obama signed the Violence Against Women Reauthorization Act, which, among many provisions, amended sections of the 1990 Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act (Clery Act).

To summarize, the major relevant provisions of VAWA are:

- A requirement for institutions to maintain statistics about the number of incidents of dating violence, domestic violence, sexual assault, and stalking that meet the specific definition of those terms
- Requirement for institutions to provide primary prevention programs to incoming students and new employees that must include: a statement that the institution prohibits the crimes of dating and domestic violence, sexual assault, and stalking; the definition of consent in reference to sexual activity; a description of safe and positive options for bystander intervention; information on risk reduction; and information on the institution's policies and procedures after a sex offense occurs; and an obligation to describe all of these within the College's Annual Security Report located at <https://www.conncoll.edu/campus-life/campus-safety/clery-information-crime-statistics/>
- A requirement to provide ongoing prevention and awareness campaigns for students and employees and to describe these in the annual security report
- A requirement to describe each type of disciplinary proceeding used by the institution; the steps, anticipated timelines, and decision-making process for each type of disciplinary

proceeding that includes how to file a disciplinary complaint, and how the institution determines which type of proceeding to use based on the circumstances of an allegation of dating violence, domestic violence, sexual assault, or stalking

- A requirement for institutions to describe the range of protective (supportive) measures that the institution may offer
- A requirement for institutions to provide a prompt, fair, and impartial disciplinary proceeding in which: officials are appropriately trained and do not have a conflict of interest or bias for or against any party; the Complainant and Respondent have equal opportunities to have others present, including an Advisor of their choice; the Complainant and Respondent receive simultaneous notification, in writing, of the results of the hearing and any available appeal procedures; the procedures completed in a reasonable prompt timeframe; the Complainant and Respondent are given timely notice of meetings at which one or the other or both may be present; and the Complainant and the Respondent and their Advisors are given timely and equal access to information that will be used during formal and informal disciplinary meetings and hearings

There are a lot of similarities between Title IX and VAWA compliance. Ultimately, both ensure Complainants and Respondents have a full understanding of their rights, the institution’s responsibilities, and transparency with navigating the institution’s process for resolving reported sex offenses.

POLICY TERMINOLOGY AND SEX OFFENSE DEFINITIONS

There is certain terminology used in both the policy and procedures that are important for you to know. Additionally, members of the Title IX team will use these terms in their written and verbal communication. Below is a chart of the most common terminology used and its definition:

<i>Term</i>	<i>Definition</i>
<i>Actual Knowledge</i>	Notice of sex-based harassment or allegations of sex-based harassment to the College’s Title IX Coordinator or any official of Connecticut College who has the authority to institute corrective measure on behalf of the College
<i>Complainant</i>	An individual who is alleged to be the victim of conduct that could constitute sex-based harassment
<i>Respondent</i>	An individual who has been reported to be the perpetrator of conduct that could constitute sex-based harassment
<i>Supportive Measures</i>	Non-disciplinary, non-punitive individualized services offered as appropriate, as reasonably available, and without fee or charge to the Complainant or the Respondent before or after the filing of a complaint or where no complaint has been filed
<i>Advisor</i>	A person chosen by a party to accompany the party to meetings related to the resolution process and/or to advise the party on that process
<i>Confidential Resource</i>	An employee who is not a Mandated Reporter of notice of harassment, discrimination, and/or retaliation

Decision-Maker	The person, panel, and/or Chair who hears evidence, determines relevance, and makes the final determination of whether the policy has been violated and/or assigns sanctions
Investigator	The person or persons designated by the College to gather facts about an alleged violation of the policy, assess relevance and credibility, synthesize the evidence, and compile this information into an investigation report of relevant evidence
Mandated Reporter	An employee of the College who is obligated by policy to share knowledge, notice, and/or reports of harassment, discrimination, and/or retaliation with the Title IX Coordinator
Notice	When an employee, student, or third-party informs the Title IX Coordinator or other Official with Authority of the alleged occurrence of harassing, discriminatory, and/or retaliatory conduct
Parties	The Complainant(s) and Respondent(s), collectively

Connecticut College’s Equal Opportunity, Harassment and Nondiscrimination Policy is intended to define expectations for appropriate conduct and outline resolution processes to address conduct that does not meet these expectations. You can review the College’s full policy [at this webpage](#).

Sex offenses, including sex-based harassment, sexual assault, sexual exploitation, domestic violence, dating violence, and/or stalking are violations of the College’s Conduct code and its Equal Opportunity, Harassment and Nondiscrimination Policy. A number of federal laws and regulations, including Title IX, VAWA, and the Clery Act, mandate how institutions of higher education must respond to sex offenses. Many types of sex offenses also constitute violations of Connecticut law.

Members of the campus community, guests, and visitors have a right to be free from sexual offenses and to be protected by College policy regardless of sex, sexual orientation, gender identity, or gender expression. All members of the campus community must conduct themselves in a way that does not infringe upon the rights of others. When individuals are found to have violated policy, the College will impose serious sanctions, as noted in the Sanctions section of this document.

SEX OFFENSE DEFINITIONS

The following are the definitions of conduct prohibited by the College’s Equal Opportunity, Harassment and Nondiscrimination Policy:

SEX-BASED HARASSMENT:

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

SEXUAL ASSAULT, defined as:

- a. Rape:
 - o Penetration, no matter how slight,
 - o of the vagina or anus of the Complainant,
 - o with any body part of the Respondent or by Respondent's use of an object, or
 - o oral penetration of the Complainant by a sex organ of Respondent, o without the consent of the Complainant.
- b. Fondling:
 - o The touching of the private body parts of the Complainant (buttocks, groin, breasts),
 - o by the Respondent for the purpose of sexual gratification,
 - o without the consent of the Complainant,
 - o including instances where the Complainant is incapable of giving consent because of their age or because of a temporary or permanent mental incapacity.
- c. Incest:
 - o Sexual intercourse,
 - o between persons who are related to each other,
 - o within the degrees wherein marriage is prohibited by CT law.
- d. Statutory Rape:
 - o Sexual intercourse,
 - o with a person who is under the statutory age of consent of 16.

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 person 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 your state, 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 your state.

STALKING, defined as:

- Engaging in a course of conduct,
- On the basis of sex,
- Directed at a Complainant, that would
 - Cause a reasonable person to fear for the person's safety, or the safety of others; or
 - Suffer substantial emotional distress.

SEXUAL EXPLOITATION, defined as:

- 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.

CONSENT

In all sexual encounters, it is important that you obtain consent. Each of us is responsible for obtaining consent and has a right to choose to give consent or not give consent. Consent is:

- Informed, knowing, and voluntary (freely given)
- Active (not passive)
- Affirmative, clear words or actions that create mutually understandable permission regarding the conditions of sexual or intimate activity
- Not something that can be given by someone who is known to be, or who should be known to be, mentally or physically incapacitated
- Not something that can be obtained by use of physical force, compelling threats, intimidating behavior, or coercion

If consent is withdrawn, sexual activity must stop reasonably immediately. Any party can place conditions on their willingness to consent, and those conditions must be respected.

People may experience the same interactions differently, therefore each party is responsible for making sure that their potential partner has provided ongoing, clear consent to engage in any sexual activity or contact.

Consent to some forms of sexual activity (e.g., kissing, fondling, etc.) should not be construed as consent for other kinds of sexual activities (e.g., intercourse).

To legally give consent in Connecticut, individuals must be at least 16 years old. If a person is in a position of power, authority, or supervision and is 20 years of age or older, then individuals must be at least 18 years old to give consent. Children over age 13 may consent to sexual activity so long as the

person is not more than 2 years older. Children under age 13 may legally consent to sexual activity with partners who are less than 2 years older.

Force: Force is the use of physical violence and/or physical imposition to gain sexual access. 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.”).

Sexual activity that is forced is, by definition, non-consensual, but non-consensual sexual activity is not necessarily forced. Silence or the absence of resistance alone is not 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.

Coercion: Coercion is unreasonable pressure for sexual activity. Coercive conduct differs from seductive conduct based on factors such as the type and/or extent of the pressure used to obtain consent. When someone makes clear that they do not want to engage in certain 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.

Incapacitation: This is defined as a state in which individuals are unable to make rational, reasonable decisions because they lack the capacity to understand the “who, what, when, where, why, or how” of a situation or interaction. Individuals cannot sexually consent if they are unable to understand what is happening, or if they are disoriented, helpless, asleep, or unconscious for any reason. That applies even if it is because they voluntarily consumed alcohol or drugs. Unless consent is “knowing,” it is not valid. Individuals engaging in sexual activity who know or should have known that the other party is incapacitated are engaging in sexual misconduct.

The fact that a Respondent was intoxicated and therefore did not realize that the Complainant was incapacitated does not excuse sexual assault.

While College policy uses different standards and definitions than the Connecticut State criminal law, sex and gender-based incidents often overlap with the crimes of sexual assault, stalking, dating violence, and domestic violence. For more information about the Connecticut State criminal law definitions of sexual assault, stalking, dating violence, and domestic violence, see the College’s Annual Security Report located at <https://www.conncoll.edu/campus-life/campus-safety/clery-information-crime-statistics/>.

RESOLUTION PROCESS

Connecticut College’s full grievance process for sex-based harassment defined above and in accordance with the regulations can be accessed at [this webpage](#).

The College treats Complainants and Respondents equitably by providing remedies to a Complainant when a determination of responsibility for sex-based harassment has been made against the Respondent and by following a grievance process that complies with the Title IX regulations and VAWA. Here is an overview of the major steps in the process:

STEP ONE: INTAKE

The Title IX Coordinator may assist the Complainant with understanding the policy and procedures, their options, and accessing resources. Assuming the Complainant chooses to file a complaint and move forward with a formal or informal resolution process, the next step is an initial evaluation. If there is an anonymous report, third-party report, or an unidentified Complainant, the Title IX Coordinator will attempt to: (1) take appropriate action to determine who was impacted and/or involved in the reported behavior to offer them supportive measures and resources and explain their process options, and (2) take reasonable action to stop the behavior, remedy its effects on individuals and the campus community, and prevent it from recurring in the future.

All resolutions will be conducted by officials who receive annual training on issues related to sexual harassment, which includes domestic violence, dating violence, sexual assault, and stalking. The Title IX Coordinator, Investigators, Decision-makers, and any person who facilitates an informal resolution process are required to be trained on: the definitions of sex-based harassment; the scope of the College's education program or activity; how to conduct an investigation and grievance process that includes hearings, appeals, and informal resolution processes, as applicable; and serving impartially, including by avoiding prejudgment of the facts at issue, identifying conflicts of interest, and bias. Additionally, Decision-makers must receive training on any technology used at a live hearing and on issues of relevance of questions and evidence, including when questions and evidence about the Complainant's sexual predisposition or prior sexual behavior are not relevant. Any materials used for training the Title IX team will not rely on sex stereotypes and will promote impartial investigations and adjudications of complaints of sex-based harassment. You can view the training materials provided to the Title IX team at: <https://www.conncoll.edu/title-ix/training/>.

The College resolution process is confidential. The institution will protect the confidentiality of parties throughout the resolution process, consistent with the provisions of state and federal law. Title IX-related resolutions are not typically subject to publicly available open records requests (e.g., FOIA) provisions. Any required release of information about a resolution will be accomplished without the inclusion of identifying information about the Complainant. Information about the Respondent will only be released to the extent permitted by law.

STEP TWO: 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.

STEP THREE: CHOOSE AN ADVISOR (if you have not already)

The parties are each entitled to an Advisor of their choice to accompany them to any and all meetings pertaining to the complaint. An Advisor can be anyone, including but not limited to an attorney, friend, roommate, or parent. Advisors can be extremely helpful in assisting parties with navigating the Title IX resolution process.

For representation, Respondents may wish to contact organizations such as:

- FACE (<http://www.facecampusequality.org>)
- SAVE (<http://www.saveservices.org>)

Complainants may wish to contact organizations such as:

- The Victim Rights Law Center (<http://www.victimrights.org>)
- The National Center for Victims of Crime (<http://www.victimsofcrime.org>), which maintains the Crime Victim's Bar Association
- The Time's Up Legal Defense Fund: <https://nwlc.org/times-up-legal-defense-fund/>

Victim Advocates

Complainants may want to choose an advocate as their Advisor, or to have access to an advocate for support. Advocates are individuals who may or may not be employed by an institution for the purpose of providing confidential support and resources independent of or in conjunction with a sex- or gender-based discrimination or misconduct resolution process. Advocates are typically trained to provide crisis response services and connection to law enforcement, legal, health, and other emergency services. Advocates are often involved in assisting with the provision of supportive measures for Complainants such as academic adjustments, employment adjustments, housing relocation, and coordination of medical or mental health services.

Below is a list of on-campus, community-based, and national advocacy services available.

Campus Advocates

- Nicole Powell, Director of Sexual Violence Prevention and Advocacy, spowell2@conncoll.edu

Community Advocacy Services

- [CT Coalition Against Sexual Assault](#), at 1-888-999-5545. 24 hours/7 days a week confidential hotline
- [CT Coalition Against Domestic Violence](#), at 1-888-774-2900. 24 hours/7 days a week confidential hotline

National Advocacy Services

- [Safe Futures](#), at 1-860-701-6000. 24 hours/7 days a week confidential hotline
- [RAINN](#), at 1-800-656-4673 or <https://hotline.rainn.org/online>. 24 hours/7 days a week confidential telephone and online hotline
- [National Domestic Violence Hotline](#), at 1-800-799-7233 or <https://www.thehotline.org/what-is-live-chat/>. 24 hours/7 days a week confidential telephone and online hotline

National Organizations Supporting Crime Victims

- [National Center for Injury Prevention and Control](#)
- [National Organization for Victim Assistance \(NOVA\)](#)
- [National Coalition of Anti-Violence Programs \(NCAVP\)](#)

STEP FOUR: 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.

STEP FIVE: 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.

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

STEP SIX: FINAL 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:
 - o 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.
 - o 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.

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.

STEP SEVEN: 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.

See Section 50. Appeal of the Determination of the Equal Opportunity, Harassment and Nondiscrimination Policy for further details on appeal procedures.

TIMELINES FOR RESOLUTION

Connecticut College is committed to resolving complaints within a reasonably prompt timeframe. The College’s policy and procedures detail this timeline more specifically. Below is a template that will keep you informed of the timeline for your incident. Connecticut College’s process allows for the temporary delay of the grievance process or limited extensions of time frames for good cause with written notice to the Complainant and the Respondent. This notification will include specifics of the delay or extension with a detailed reason for the action. Contact the Title IX Coordinator if you need a delay in the process, or an extension for an aspect of the process.

INFORMAL RESOLUTION PROCESS

A Complainant or Respondent may make a request for Informal Resolution 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. Parties who wish to initiate an informal resolution process should contact the Title IX Coordinator.

All parties must agree, in writing, to initiate an informal resolution process. The parties may agree as a condition of engaging in informal resolution that statements made or evidence shared during the informal resolution process will not be considered in the formal grievance process unless all parties consent.

It is not necessary to pursue informal resolution first to pursue a formal grievance process, and any party participating in informal resolution can stop the process at any time and begin or resume the formal grievance process.

The College offers four categories of Informal Resolution:

- 1) Supportive Resolution. When the Coordinator can resolve the matter informally by providing supportive measures (only) designed to remedy the situation.
- 2) 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.
- 3) 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.

4) 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 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 ultimate determination of whether Alternative Resolution is available or successful is made by the Title IX Coordinator. The Title IX Coordinator is authorized to facilitate a resolution that is acceptable to all parties, and/or to accept a resolution that is proposed by the parties, usually through their Advisors, including terms of confidentiality, release, and non-disparagement. Alternative Resolution agreements are not subject to appeal once agreed upon by all parties.

The Title IX Coordinator maintains records of any resolution that is reached, and failure to abide by the resolution agreement may result in appropriate responsive/disciplinary actions (e.g., referral for formal resolution, referral to the conduct process for failure to comply).

Results of complaints resolved by Alternative Resolution are not appealable.

Respondent Accepts Responsibility for Alleged Violations

The Respondent may accept responsibility for all or part of the alleged policy violations at any point during the Resolution Process. If the Respondent indicates an intent to accept responsibility for all of the alleged misconduct, the formal process will be paused, and the Title IX Coordinator will determine whether Informal Resolution can be used according to the criteria above.

If Informal Resolution is applicable, the Title IX Coordinator will determine whether all parties and the College are able to agree on responsibility, restrictions, and/or remedies. If so, the Title IX Coordinator implements the accepted finding that the Respondent is in violation of the College's policy and implements agreed-upon restrictions and remedies and determines the appropriate sanction(s) in coordination with other appropriate administrator(s), as necessary.

This result is not subject to appeal once all parties indicate their written assent to all agreed upon resolution terms. When the parties cannot agree on all terms of resolution, the Formal Grievance Process will resume at the same point where it was paused.

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

SANCTIONS AND REMEDIES

There are several factors considered when determining a sanction. Sanctions are imposed and enforced when the Respondent has been found in violation of the College sexual harassment policy. Some consideration for sanctioning include:

- The nature, severity of, and circumstances surrounding the violation(s)
- The Respondent's disciplinary history
- Previous allegations or allegations involving similar conduct
- 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
- Any other information deemed relevant by the Decision-maker(s)

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

Examples of student sanctions are:

- **Disciplinary Warning:** A letter indicating that a student has been found responsible for a violation of the Honor Code and/or the Student Code of Conduct. This sanction indicates that if the student is again found in violation of the Honor Code and/or Student Code of Conduct, a sanction will likely be imposed that reflects a repeated violation.
- **Required Counseling:** A mandate to meet with and engage in either College-sponsored or external counseling to better comprehend the misconduct and its effects.
- **Disciplinary Probation Level 1:** A status indicating that a student has been found responsible for a violation of the Honor Code and/or the Student Code of Conduct that reflects a more 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 of the Honor Code and/or Student Code of Conduct 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 of the Honor Code and/or Student Code of Conduct. This sanction will be in effect for a specified period of time and indicates that if the student is found in violation of the Honor Code and/or Student Code of Conduct during the

period of this status, the imposed sanction may include Loss of Housing, Suspension from the College, or Expulsion from the College. While on 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 (i.e., Study Away programs, CELS internships). When placed on this status, the Office of the Dean of the College and the student's parent/guardian may be notified.

- **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.
- **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 his or her studies following an interview with the Dean of Students or their designee. A suspended student may not engage in College activities, use any College facilities, or be on College property without expressed 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.
- **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.
- **Withholding Diploma:** The College may withhold a student's diploma for a specified period of time and/or deny a student participation in commencement activities as a sanction if the student is found responsible for violating policy.
- **Revocation of Degree:** The College reserves the right to revoke a degree previously awarded from the College for fraud, misrepresentation, and/or other violation of College policies, procedures, or directives in obtaining the degree, or for other serious violations committed by a student prior to graduation.
- **Other Actions:** In addition to or in place of the above sanctions, the College may assign any other sanctions in the Student Handbook as deemed appropriate.

Examples of employee sanctions are:

- *Verbal or Written Warning*
- *Performance Improvement Plan/Management Process*
- *Enhanced Supervision, Observation, or Review*
- *Required Counseling*
- *Required Training or Education*
- *Probation*
- *Loss of Annual Denial of Pay Increase/Pay Grade*

- *Loss of Oversight or Supervisory Responsibility*
- *Demotion*
- *Transfer*
- *Reassignment*
- *Assignment to New Supervisor*
- *Delay of (or referral for delay of) Tenure Track Progress*
- *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.

Long-term Remedies/Other actions

Following the conclusion of the resolution process, and in addition to any sanctions implemented, the Title IX Coordinator may implement additional long-term remedies or actions with respect to the parties and/or the campus community that are intended to stop the harassment, discrimination, and/or retaliation, remedy the effects, and prevent reoccurrence.

PREVENTION AND AWARENESS PROGRAMS

Connecticut College offers a range of campaigns, strategies, and initiatives to promote awareness, education, risk reduction, and prevention in an effort to reduce the frequency of sex or gender-based discrimination, harassment, and violence amongst members of the campus community. It is the policy of the College to offer programming to identify and prevent domestic violence, dating violence, sexual assault (including stranger and known offender assaults), and stalking each year.

Bystander Intervention: The College offers bystander intervention programming to all new students in an effort to ensure that each member of the campus community is invested in creating a safe campus environment. Program participants are instructed on safe options for preventing harm and intervening when a risk of sexual misconduct exists.

Bystander intervention means safe and positive options that may be carried out by individuals to prevent harm or intervene when there is a risk of dating violence, domestic violence, sexual assault, or stalking. Bystander intervention is encouraged, and includes recognizing situations of potential harm, understanding institutional structures and cultural conditions that facilitate violence, overcoming barriers to intervening, identifying safe and effective intervention options, and taking action to intervene. Some methods for bystander intervention are calling for help, using intervention-based apps, and/or creating distractions.

The College offers bystander empowerment training, which highlights the need for those who intervene to ensure their own safety in the intervention techniques they choose and motivates them to intervene as stakeholders in the safety of the community when others might choose to be bystanders.

VAWA Training: Incoming students and new employees are provided with education and training on awareness and risk reduction of sexual violence, dating violence, domestic violence, stalking and consent in compliance with the Violence Against Women Act. Educational programs are offered to raise

awareness for all incoming students and employees and are often conducted during new student and new employee orientation and throughout an incoming student's first semester.

Risk reduction means options designed to decrease perpetration and bystander inaction, and to increase empowerment for victims in order to promote safety, and to help individuals and the College community address conditions that facilitate violence. The College offers programs to provide information on risk reduction that strive to empower individuals who experience these incidents, train participants to recognize warning signs, and how to avoid potential attacks, and do so without biased approaches. These programs and training, such as the Green Dot training, are offered by the Office of Sexual Violence Prevention and Advocacy. Programs are informed by evidence-based research and/or are assessed for their effectiveness.

Ongoing Campaigns: Ongoing awareness and prevention campaigns are provided throughout the school year to students, faculty, and staff. Programs and other campaigns offered throughout the year to all students and employees include strong messages regarding not just awareness, but also primary prevention (including normative messaging, environmental management, and bystander intervention), and discuss institutional policies on sex or gender-based discrimination, harassment, and violence as well as the Connecticut definitions of domestic violence, dating violence, sexual assault, stalking, and consent in reference to sexual activity.

FREQUENTLY ASKED QUESTIONS (FAQ)

Can an attorney be my Advisor?

Yes. You have the right to an Advisor of your choice, which can include an attorney.

Will my parents/guardians find out about this incident?

It depends. If you are a minor, members of the Title IX team have certain mandatory reporting obligations, which may include notifying your parents/guardians of the incident.

If you are not a minor, this incident is a part of your education record, which is protected under the Family Educational Rights and Privacy Act (FERPA). This means that your education record cannot be shared with anyone with whom you have not given Connecticut College permission to share.

Do I have to resolve this through a formal grievance process?

No. You have options. Any party who wishes to resolve the matter informally should contact the Title IX Coordinator. All parties must agree, in writing, to informally resolve for this to be an option.

Is there a time limit on when I can report?

There is no statute of limitations on when a complaint can be filed however there are certain jurisdictional requirements that must be met to pursue a formal grievance process under Title IX.

Will I get in more trouble if I was drinking underage during the incident?

The College maintains a policy of offering parties and witnesses amnesty from minor policy violations such as underage consumption of alcohol or the use of illicit drugs related to the incident.

What happens if the Respondent fails to comply with the sanctions?

Respondents are expected to comply with the assigned sanctions, responsive actions, and/or corrective actions within the timeframe specified by the final Decision-maker(s). Failure to abide by the sanction(s)/action(s) imposed by the date specified, whether by refusal, neglect, or any other reason, may result in additional sanction(s)/action(s), including suspension, expulsion, and/or termination.

What happens if the Respondent transfers, leaves, or resigns prior to the conclusion of the formal resolution process?

If a Respondent permanently withdraws or resigns, the resolution process ends with a dismissal, as the College no longer has disciplinary jurisdiction over the withdrawn student or former employee. However, 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 harassment, discrimination, and/or retaliation.

What if law enforcement is involved?

Connecticut 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 may undertake a short delay in its investigation if circumstances require. Communication will be sent to the parties explaining the reason(s) for the delay and the anticipated duration of the delay.