

NORTHLAND COLLEGE

2020 COMBINED ANNUAL SECURITY REPORT & FIRE SAFETY REPORT

Introduction

This report is provided in compliance with the Jeanne Clery Disclosure of Campus Security Policy and Crime Statistics Act, as amended. It provides students and employees of Northland College ("College") with information on: the College's security arrangements, policies and procedures; programs that provide education on such things as drug and alcohol abuse, awareness of various kinds of sex offenses, and the prevention of crime generally; and procedures the College will take to notify the campus community in the event of an emergency. Its purpose is to provide students and employees with information that will help them make informed decisions relating to their own safety and the safety of others.

Policy for Preparing the Annual Report

This report is prepared by the Melissa Harvey, Dean of Students in cooperation with local law enforcement authorities and includes information provided by them as well as by the College's campus security authorities and various other elements of the College. Each year an e-mail notification is made to all enrolled students and employees that provides the website link to access this report. Prospective students and employees are also notified of the report's availability. Hard copies of the report may also be obtained at no cost by contacting Dean of Students, Northland College, 1411 Ellis Ave, Ashland, WI 54806 or 715-682-1230. The College is committed to taking the actions necessary to provide a safe and secure working/learning environment for all students and staff. As a member of the campus community, you can feel safe and comfortable knowing that security procedures are in place that represent best practices in the field, and are constantly tested and re-evaluated for their effectiveness.

General Safety and Security Policies

Campus Security Personnel & Relationship with Local Law Enforcement

The College does not have a police department, but it does have a Campus Safety Office that works to promote and provide a safe living, learning, and working environment for the College community.

Criminal incidents are referred to the local police who have jurisdiction on campus. The Campus Safety Office maintains a highly professional and collaborative relationship with the Ashland County Sheriff's Office, Ashland City Police, and other local law enforcement, which help augment security services on campus. The College and the Ashland City Police Department continue to explore a formal memorandum of understanding (MOU) regarding the investigation of crimes on campus, though it has yet to be executed.

Campus Security Authorities

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The College has designated certain officials to serve as campus security authorities. Reports of criminal activity can be made to these officials. They in turn will ensure that the crimes are reported for collection as part of the College's annual report of crime statistics. The campus security authorities to whom the College would prefer that crimes be reported are listed below.

- Campus Safety at 715-682-1399 or 715-209-6971
- Title IX Coordinator at 715-682-1484
- Deputy Title IX Coordinators at 715-682-1245 or 715-682-1677
- Director, Residential Life at 715-682-1674
- Dean of Students at 715-682-1230

Reporting a Crime or Emergency

The College encourages accurate and prompt reporting of all criminal actions, emergencies, or other incidents occurring on campus, on other property owned by the College, or on nearby public property to the appropriate administrator and appropriate police agencies. Such a report is encouraged even when the victim of a crime elects not to make a report or is unable to do so.

- **To reach an outside line from a campus phone, you must first dial 8.**
- All crimes occurring on or near College property should be reported immediately to the Campus Safety Office. The number to contact is 715-682-1399 or 715-209-6971. The office is located on the second floor of Mead Hall, #237.
- For on campus emergencies (police, fire or medical):
 - Dial 9-1-1 from a campus phone
 - Dial 1399 from a campus phone
 - Dial 715-682-1399 or 715-209-6971 from an off campus phone or a cell phone
 - Use the emergency (blue) call boxes located at each Residence Hall
- For off campus emergencies:
 - Dial 9-1-1
- For on campus non emergencies
 - Dial 1399 from a campus phone
 - Dial 715-682-1399 or 715-209-6971 from an off campus phone or cell phone
- Students, staff, and visitors should also report situations to one of the campus security authorities identified above. Once reported, the individual may also be encouraged to report the situation to the appropriate police agency. If requested, a College staff member will assist in making the report to police.
- Anonymous incident reports can also be made by contacting Campus Safety at 715-682-1399 or 715-209-6971 but not providing a name.

Dialing 9-1-1 will initiate a local law enforcement or fire department response. After you contact 9-1-1, we encourage you to call Campus Safety to notify them that you contacted local authorities so that security staff may provide any assistance that is required. If the situation is an emergency and you are in the vicinity of a blue light phone, it can be used to contact Campus Safety or the local police.

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When Campus Safety is notified, they will respond to your location, investigate the situation, provide support, file an incident report (when applicable) and assist you with any other needs you may have as a result. All reports made to Campus Safety will be referred to either the Title IX Office or the Office of Student Affairs for further appropriate next steps. All individuals witnessing a crime will be encouraged to report the incident to local law enforcement. All reports made to Campus Safety will be included in the campus crime log.

Any member of the campus community can file an incident report. Contact Campus Safety at 715-682-1399 or 715-209-6971 to file a report.

Confidential Reporting

The College will protect the confidentiality of victims. Only those with a need to know the identity for purposes of investigating the crime, assisting the victim or disciplining the perpetrator will know the victim's identity.

Pursuant to the College's Sexual and Gender-Based Misconduct Policy, when a "mandatory reporter" becomes aware of alleged misconduct under that policy (including, but not limited to, dating violence, domestic violence, sexual assault, and stalking), the employee is responsible for reporting that information, including the status of the parties if known, to the Title IX Coordinator. Other personnel may be allowed to keep such information private, and certain designated confidential resources may not report this type of information, thus allowing the victim to keep the report confidential.

A victim of sexual or gender-based crimes who does not want to pursue action within the College conduct system or the criminal justice system is encouraged to make a confidential report to the Counselor or Student Nurse (Ponzio Campus Center).

A victim of other types of crimes (e.g., aggravated assault, burglary, etc.) who does not want to pursue action within the College disciplinary system or the criminal justice system is nevertheless encouraged to make a confidential report to a campus security authority. Upon the victim's request, a report of the details of the incident can be filed with the College without revealing the victim's identity. Such a confidential report complies with the victim's wishes, but still helps the College take appropriate steps to ensure the future safety of the victim and others. With such information, the College can keep an accurate record of the number of incidents involving members of the campus community, determine where a pattern of crime may be developing and alert the community as to any potential danger. These confidential reports are counted and disclosed in the annual crime statistics for the College.

The College encourages its professional counselors, if and when they deem it appropriate, to inform the person they are counseling to report crimes on a voluntary, confidential basis for inclusion in the annual report of crime statistics. The College does not have pastoral counselors.

Security of and Access to Campus Facilities

All doors leading to the living areas of the residence halls are locked 24 hours a day. Residents are given access to the campus residence halls that they live in via their

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student ID card. Residents are responsible for their room key/student ID card and for keeping their room door locked. Residents must escort their guests at all times. Maintaining residence hall security is a shared responsibility of all residents. It is a violation of policy if residents are found to be loaning their student ID card or room key to anyone or propping open a security door. Residents are encouraged to contact Campus Safety and residential life staff if they observe anyone in their living area who is unknown or appears suspicious. Over extended breaks, the doors to all the hall will not be accessible unless the student has received prior permission to stay on campus.

Non-residential campus facilities remain unlocked during the day and into the evening. Some buildings are locked at the end of the work day while others are open until 11 PM. However, hours do vary depending on the use of the building. For questions regarding building accessibility, contact Campus Safety. During non-business hours access to all College facilities is by ID card, by key, or by admittance via Campus Safety. ID cards and keys are not to be shared.

Please remember that doors on campus are not to be propped open. Anyone propping an exterior door open or computer room door without the permission of Campus Safety may be subject to campus discipline.

Keys to the offices, laboratories, and classrooms on campus will be issued to employees only as needed and after receiving the proper authorization. Each department supervisor is responsible for assuring their area is secured and locked.

Employee and student identification cards may be used to verify the identity of persons suspected to be in campus facilities without permission.

Security Considerations in the Maintenance of Facilities

The Campus Safety Office works with the Facilities Department to identify maintenance issues on campus that may be safety hazards. Safety checks are completed on a regular and routine basis to identify problematic areas such as, but not limited to street or safety lights that are not functioning properly, to determine if shrubs or other landscaping might need trimming and to ensure that sidewalks and parking lots are cleared of snow and ice. Maintenance personnel regularly check to ensure there is adequate lighting on pathways and that egress lighting is working in hallways and stairwells.

Educational Programs Related to Security Awareness and Prevention of Criminal Activity

The College seeks to enhance the security of its campus and the members of the campus community by periodically presenting educational programs to inform students and employees about campus security procedures and practices, to encourage students and employees to be responsible for their own security and the security of others and to inform them about the prevention of crimes. These programs are discussed below.

Campus Safety at Northland College offers safety training and information sessions to students throughout the year. At informational sessions, students meet the Campus Safety

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officers and are trained on safety procedures and crime prevention. This includes information about the walking escort service provided by Campus Safety. Additional trainings for the campus community are provided on an as-needed basis. A common theme of all awareness and crime prevention programs is to encourage students and employees to be aware of their responsibility for their own security and the safety of others. In addition, information is available to the campus community through posters, brochures, displays, awareness days, and articles in the student newspaper.

Blue Light Call Boxes: To enhance safety on campus, the College has installed emergency telephones (blue light call boxes) at several campus locations. These blue light call boxes provide callers with the ability to summon help in an emergency and the phones are accessible 24/7. The phone includes an emergency button which immediately summons 911. The phones can also be used to call Campus Safety as well as other numbers on campus.

Blue Light Call Box Locations:

- Fenenga Hall
- McMillan Hall
- Mead Hall
- MELLC (McLean Environmental Living and Learning Center)
- Memorial Hall

Safe Walk Escorts: Campus Safety officers are available to escort students, faculty, and staff between facilities on campus. All campus residents are informed of this service at the initial hall meetings each semester and in numerous campus publications.

Campus Video System: There are several cameras located at key locations across campus to help provide a safer campus environment. The cameras have continuous recording capabilities.

Card Access System: The campus has a card access system that controls entry into campus facilities. The residential halls are locked 24/7 and can only be accessed through the use of the card. Residents have access to on-campus residence hall in which they live. Other facilities are open during daytime hours, and have card access during closed periods for those who are authorized to use the facility.

Safety Tips:

- Travel in pairs at night.
- Make use of the safe walk escort service provided by Campus Safety (x1399) or 715-209-6971.
- Park in well-lit areas at night.
- Notify your residential life staff if you plan to be gone from campus more than 1 day.
- Lock your bicycle.
- Keep all valuables out of sight in your parked vehicle.
- Use locks at all times.
- Do not prop open doors.

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- **Keep control of your beverage at all times.**
- **Be aware beverages or food prepared by people who you don't know.**
- Do not give out any personal or financial information over the internet, email, or by telephone without first verifying with the organization requesting the information that the request is genuine.
- If you observe an unknown visitor in your residence hall, notify Campus Safety immediately.
- If your ID card is lost or stolen, notify Campus Safety then visit the ID office to obtain a new ID.
- Have your key or ID card ready as you approach your vehicle or living area.
- When you are out for the evening, let someone know where you are and who you are with and to report it to Campus Safety if you do not return when you have indicated that you would return to campus.
- Be aware of your surroundings. The College does not have any officially recognized student organizations with off campus locations and therefore does not monitor or record criminal conduct occurring at such locations.

Disclosure of the Outcome of a Crime of Violence or Non-Forcible Sex Offense

Upon written request, the College will disclose to the alleged victim of a crime of violence (as that term is defined in section 16 of title 18, United States Code), or a non-forcible sex offense, the report on the results of any disciplinary proceeding conducted by the College against a student who is the alleged perpetrator of such crime or offense. If the alleged victim is deceased as a result of such crime or offense, the next of kin of such victim shall be treated as the alleged victim for purposes of the paragraph.

The previous paragraph does not apply to victims of dating violence, domestic violence, sexual assault, or stalking because under the Violence Against Women Act both the accused and accuser in these cases are given the results without the need to make a written request.

Drug and Alcohol Policy

The College is committed to creating and maintaining an environment that is free of alcohol abuse. The College prohibits the possession, use, and sale of alcohol beverage on campus or as any part of the College's activities, unless it is done so in accordance with applicable College policies, and it also enforces the state's underage drinking laws.

The College also enforces federal and state drug laws. The possession, sale, manufacture or distribution of illegal drugs is prohibited on campus or as any part of the College's activities. Violators of the College's policies or federal and state laws regarding illegal drugs will be subject to disciplinary action and possibly criminal prosecution.

Federal Drug Laws

Denial of Federal Benefits (21 U.S.C. 862) A federal drug conviction may result in the loss of federal benefits, including school loans, grants, scholarships, contracts, and licenses. Federal drug trafficking convictions may result in denial of federal benefits for up to five years for a first conviction. Federal drug convictions for possession may result in denial of

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federal benefits for up to one year for a first conviction and up to five years for subsequent convictions.

Forfeiture of Personal Property and Real Estate (21 U.S.C. 853) Any person convicted of a federal drug offense punishable by more than one year in prison shall forfeit to the United States any personal or real property related to the violation, including houses, cars, and other personal belongings. A warrant of seizure is issued and property is seized at the time an individual is arrested on charges that may result in forfeiture.

Federal Drug Trafficking Penalties (21 U.S.C. 841) Penalties for federal drug trafficking convictions vary according to the quantity of the controlled substance involved in the transaction. Penalties for subsequent convictions are twice as severe.

If death or serious bodily injury results from the use of a controlled substance which has been illegally distributed, the person convicted on federal charges of distributing the substance faces the possibility of a life sentence and fines ranging up to \$10 million.

Persons convicted on federal charges of drug trafficking within 1,000 feet of a university (21 U.S.C. 860) face penalties of prison terms and fines which are twice as high as the regular penalties for the offense, with a mandatory prison sentence of at least one year.

Federal Drug Possession Penalties (21 U.S.C. 844) Persons convicted on federal charges of possessing any controlled substance face penalties of up to one year in prison and a mandatory fine of no less than \$1,000. Second convictions are punishable by not less than 15 days but not more than two years in prison and a minimum fine of \$2,500. Subsequent convictions are punishable by not less than 90 days but not more than three years in prison and a minimum fine of \$5,000.

Drug and Alcohol State Laws

Category	Summary (Wisconsin Statutes)
Possession of Marijuana	Possession of marijuana is prohibited in Wisconsin. <i>See</i> Wis. Stat. Ann. § 961.41 (West 2020). A first offense is a misdemeanor, resulting in a fine of up to \$1,000 and/or imprisonment up to six months. <i>See id.</i> For a first offense of possession or attempted possession, the court may defer further proceedings and place the person on probation upon terms and conditions. <i>See</i> Wis. Stat. Ann. § 961.47 (West 2020). Medical marijuana is also illegal.
Controlled Substances	Wisconsin has a range of statutes governing controlled substances and their possession and distribution. <i>See</i> Wis. Stat. Ann. §§ 961.11 – 961.69 (West 2020). No person may possess or attempt to possess a controlled substance or a controlled substance analog unless otherwise authorized. <i>See</i> Wis. Stat. Ann. § 961.41(3g) (West 2020). The penalty for possession of a controlled substance depends upon factors such as the classification of the controlled substance, any prior offenses, and whether the possession was in or near a public housing project, a jail, a public park, pool, or youth center, or a public or tribal school. <i>See id.</i> ; Wis. Stat. Ann. § 961.495 (West 2020). The penalty for possessing or attempting to possess a

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Category	Summary (Wisconsin Statutes)
	<p>controlled substance included in schedule I or II, which is a Class I felony, is a fine of up to \$10,000, imprisonment of up to 3.5 years, or both. <i>See</i> Wis. Stat. Ann. § 939.50 (West 2020). For certain possession offenses, the court will require an assessment of the person’s use of controlled substances and, if appropriate, develop a proposed treatment plan. <i>See</i> Wis. Stat. Ann. § 961.472; § 961.475 (West 2020). It is also illegal to acquire or obtain possession of a controlled substance by misrepresentation, fraud, forgery, deception, or subterfuge, which is a Class H felony punishable by a fine of up to \$10,000, imprisonment of up to six years, or both. <i>See</i> Wis. Stat. Ann. § 961.43; § 939.50 (West 2020). Manufacture, distribution, or delivery is also prohibited. <i>See</i> Wis. Stat. Ann. § 961.41 (West 2020).</p> <p>As an example, possession of more than 50 grams of heroin results in a fine between \$1000 and \$50,000. <i>See</i> Wis. Stat. Ann. § 961.41 (West 2020).</p>
Alcohol and Minors	<p>It is a violation for an underage person to procure or attempt to procure alcoholic beverages, to possess or to consume alcoholic beverages on a licensed premise, or to falsely represent their age for the purpose of receiving an alcoholic beverage. <i>See</i> Wis. Stat. Ann. § 125.07 (West 2020). In addition, no underage person may knowingly possess, transport, or have under their control any alcoholic beverage in any motor vehicle. <i>See</i> Wis. Stat. Ann. § 346.93 (West 2020).</p>
Driving Under the Influence (DUI)	<p>It is illegal for a person to drive or operate a motor vehicle with a blood alcohol concentration of 0.10% or more, or 0.10 grams or more of alcohol in 210 liters of breath. <i>See</i> Wis. Stat. Ann. § 346.63 (West 2020). A first offense results in a fine of \$150-\$300 and suspension of driver’s license from 6–9 months. A second offense within five years results in a fine of \$300-\$1,000, suspension of driver’s license for 12–18 months, and imprisonment for 4 days to 6 months. The penalties increase for additional offenses. <i>See id.</i></p>

Drug and Alcohol Abuse Prevention Program

In compliance with the Drug Free Schools and Communities Act (DFSCA), the College has a drug and alcohol abuse prevention program, which includes an annual notification to students and employees regarding certain drug/alcohol-related information (such as legal sanctions for violations of applicable laws, health risks, etc.) and a biennial review of this program to evaluate its effectiveness and assess whether sanctions are being consistently enforced. For more information, see below.

- Alcohol and Drug Policy: <https://my.northland.edu/student-policies/student-rights/>
- Controlled Substance Policy: <https://my.northland.edu/student-policies/student-rights/>
- Northland has a separate employee-focused Alcohol and Drug Policy and Drug-free Workplace Policy, which can be found in the College-wide Employment-related Policies handbook and in the Staff Handbook.

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- Information regarding the biennial review of the College's drug and alcohol abuse prevention program can be obtained by contacting the Office of Student Affairs

Policies, Procedures, and Programs Related to Dating Violence, Domestic Violence, Sexual Assault, and Stalking

Consistent with applicable laws, the College prohibits dating violence, domestic violence, sexual assault, and stalking. The College's policy used to address complaints of this nature, as well as the procedures for filing, investigating and resolving complaints, may be found at:

- Sexual & Gender-Based Misconduct Policy: <https://my.northland.edu/student-policies/student-rights/#gender>

The following sections of this report discuss the College's educational programs to promote the awareness of dating violence, domestic violence, sexual assault and stalking; provides information concerning procedures students and employees should follow and the services available in the event they do become a victim of one of these offenses, and advises students and employees of the disciplinary procedures that will be followed after an allegation that one of these offenses has occurred.

Primary Prevention and Awareness Program:

The College conducts a Primary Prevention and Awareness Program (PPAP) for all incoming students and new employees. The PPAP advises campus community members that the College prohibits the offenses of dating violence, domestic violence, sexual assault and stalking. They are also informed of the topics discussed below, including relevant definitions, risk reduction, and bystander intervention.

Crime Definitions

Crime Type (Wisconsin Statutes)	Definitions
Dating Violence	The institution has determined, based on good-faith research, that Wisconsin law does not define the term dating violence.
Domestic Violence	<p>The institution has determined, based on good-faith research, that Wisconsin law does not define the term domestic violence.</p> <p>However, Wisconsin law defines the following in its criminal statutes:</p> <ul style="list-style-type: none">Domestic Abuse (Wis. Stat. § 968.075): "Domestic abuse" means any of the following engaged in by an adult person against his or her spouse or former spouse, against an adult with whom the person resides or formerly resided or against an adult with whom the person has a child in common: (1) Intentional infliction of physical pain, physical injury or illness; (2) Intentional impairment of physical condition; (3) [Violation of Wisconsin's sexual assault

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Crime Type (Wisconsin Statutes)	Definitions
	statutes]; (4) A physical act that may cause the other person reasonably to fear imminent engagement in the conduct described under subd. 1, 2, or 3.
Stalking (Wis. Stat. § 940.32)	<ul style="list-style-type: none"> • Whoever meets all of the following criteria is guilty of a Class I felony: (a) The actor intentionally engages in a course of conduct directed at a specific person that would cause a reasonable person under the same circumstances to suffer serious emotional distress or to fear bodily injury to or the death of himself or herself or a member of his or her family or household; (b) The actor knows or should know that at least one of the acts that constitute the course of conduct will cause the specific person to suffer serious emotional distress or place the specific person in reasonable fear of bodily injury to or the death of himself or herself or a member of his or her family or household; (c) The actor's acts cause the specific person to suffer serious emotional distress or induce fear in the specific person of bodily injury to or the death of himself or herself or a member of his or her family or household. • Whoever meets all of the following criteria is guilty of a Class I felony: (a) After having been convicted of sexual assault under s. 940.225, 948.225, 948.02, 948.025, or 948.085, or a domestic abuse offense, the actor engages in any of the acts listed [below under the definition of "course of conduct"], if the act is directed at the victim of the sexual assault or the domestic abuse offense; (b) The actor knows or should know that the act will cause the specific person to suffer serious emotional distress or place the specific person in reasonable fear of bodily injury to or the death of himself or herself or a member of his or her family or household; (c) The actor's act causes the specific person to suffer serious emotional distress or induces fear in the specific person of bodily injury to or the death of himself or herself or a member of his or her family or household. • As used above, "course of conduct" means a series of 2 or more acts carried out over time, however short or long, that show a continuity of purpose, including any of the following: (1) Maintaining a visual or physical proximity to the victim; (2) Approaching or confronting the victim; (3) Appearing at the victim's workplace or contacting the victim's employer or coworkers; (4) Appearing at the victim's home or contacting the victim's neighbors; (5) Entering property owned, leased, or occupied by the victim; (6) Contacting the victim by telephone or causing the victim's telephone or any other person's telephone to ring repeatedly or continuously, regardless of whether a conversation ensues; (6m) Photographing, videotaping, audiotaping, or, through any other electronic means, monitoring or

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Crime Type (Wisconsin Statutes)	Definitions
	<p>recording the activities of the victim. This subdivision applies regardless of where the act occurs; (7) Sending material by any means to the victim or, for the purpose of obtaining information about, disseminating information about, or communicating with the victim, to a member of the victim's family or household or an employer, coworker, or friend of the victim; (8) Placing an object on or delivering an object to property owned, leased, or occupied by the victim; (9) Delivering an object to a member of the victim's family or household or an employer, coworker, or friend of the victim or placing an object on, or delivering an object to, property owned, leased, or occupied by such a person with the intent that the object be delivered to the victim; (10) Causing a person to engage in any of the acts described in subds. 1 to 9.</p>
Sexual Assault	<ul style="list-style-type: none"> • First Degree Sexual Assault (Wis. Stat. § 940.225(1)): Whoever does any of the following is guilty of a Class B felony: (a) Has sexual contact or sexual intercourse with another person without consent of that person and causes pregnancy or great bodily harm to that person; (b) Has sexual contact or sexual intercourse with another person without consent of that person by use or threat of use of a dangerous weapon or any article used or fashioned in a manner to lead the victim reasonably to believe it to be a dangerous weapon; (c) Is aided or abetted by one or more other persons and has sexual contact or sexual intercourse with another person without consent of that person by use or threat of force or violence. • Second Degree Sexual Assault (Wis. Stat. § 940.225(2)): Whoever does any of the following is guilty of a Class C felony: (a) Has sexual contact or sexual intercourse with another person without consent of that person by use or threat of force or violence; (b) Has sexual contact or sexual intercourse with another person without consent of that person and causes injury, illness, disease or impairment of a sexual or reproductive organ, or mental anguish requiring psychiatric care for the victim; (c) Has sexual contact or sexual intercourse with a person who suffers from a mental illness or deficiency which renders that person temporarily or permanently incapable of appraising the person's conduct, and the defendant knows of such condition; (cm) Has sexual contact or sexual intercourse with a person who is under the influence of an intoxicant to a degree which renders that person incapable of giving consent if the defendant has actual knowledge that the person is incapable of giving consent and the defendant has the purpose to have sexual contact or sexual intercourse with the person while the person is incapable of giving consent; (d) Has sexual contact or sexual intercourse with a person who the

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Crime Type (Wisconsin Statutes)	Definitions
	<p>defendant knows is unconscious; (f) Is aided or abetted by one or more other persons and has sexual contact or sexual intercourse with another person without the consent of that person.</p> <ul style="list-style-type: none"> • Third Degree Sexual Assault (Wis. Stat. § 940.225(3)): Whoever has sexual intercourse with a person without the consent of that person is guilty of a Class G felony. Whoever has sexual contact in the manner described in [the second and third bullet points under the definition of "sexual contact" below] with a person without the consent of that person is guilty of a Class G felony. • "Sexual contact" means any of the following (Wis. Stat. § 940.225(5)): <ul style="list-style-type: none"> ○ Any of the following types of intentional touching, whether direct or through clothing, if that intentional touching is either for the purpose of sexually degrading; or for the purpose of sexually humiliating the complainant or sexually arousing or gratifying the defendant or if the touching contains the elements of actual or attempted battery under s.940.19(1): (a) Intentional touching by the defendant or, upon the defendant's instruction, by another person, by the use of any body part or object, of the complainant's intimate parts; (b) Intentional touching by the complainant, by the use of any body part or object, of the defendant's intimate parts or, if done upon the defendant's instructions, the intimate parts of another person. ○ Intentional penile ejaculation of ejaculate or intentional emission of urine or feces by the defendant or, upon the defendant's instruction, by another person upon any part of the body clothed or unclothed of the complainant if that ejaculation or emission is either for the purpose of sexually degrading or sexually humiliating the complainant or for the purpose of sexually arousing or gratifying the defendant. ○ For the purpose of sexually degrading or humiliating the complainant or sexually arousing or gratifying the defendant, intentionally causing the complainant to ejaculate or emit urine or feces on any part of the defendant's body, whether clothed or unclothed. • Fourth Degree Sexual Assault (Wis. Stat. § 940.225(3m)): Except as provided in [the third degree sexual assault statute], whoever has sexual contact with a person without the consent of that person is guilty of a Class A misdemeanor. • First Degree Sexual Assault of a Child (Wis. Stat. § 948.02(1)): <ul style="list-style-type: none"> ○ Whoever has sexual contact or sexual intercourse with a person who has not attained the age of 13 years and causes

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Crime Type (Wisconsin Statutes)	Definitions
	<p>great bodily harm to the person is guilty of a Class A felony.</p> <ul style="list-style-type: none"> ○ Whoever has sexual intercourse with a person who has not attained the age of 12 years is guilty of a Class B felony. ○ Whoever has sexual intercourse with a person who has not attained the age of 16 years by use or threat of force or violence is guilty of a Class B felony. ○ Whoever has sexual contact with a person who has not attained the age of 16 years by use or threat of force or violence is guilty of a Class B felony if the actor is at least 18 years of age when the sexual contact occurs. ○ Whoever has sexual contact or sexual intercourse with a person who has not attained the age of 13 years is guilty of a Class B felony. <ul style="list-style-type: none"> ● Second Degree Sexual Assault of a Child (Wis. Stat. § 948.02(2)): Whoever has sexual contact or sexual intercourse with a person who has not attained the age of 16 years is guilty of a Class C felony.
Rape, Fondling, Incest, Statutory Rape	<p>For purposes of the Clery Act, the term "sexual assault" includes the offenses of rape, fondling, incest, and statutory rape. These definitions under Wisconsin law are as follows:</p> <ul style="list-style-type: none"> ● Rape: The institution has determined, based on good-faith research, that Wisconsin law does not define the term rape. ● Fondling: The institution has determined, based on good-faith research, that Wisconsin law does not define the term fondling. ● Incest (Wis. Stat. § 944.06): Whoever marries or has nonmarital sexual intercourse, as defined in Section 948.01(6) with a person he or she knows is a blood relative and such relative is in fact related in a degree within which the marriage of the parties is prohibited by the law of this state is guilty of a Class F felony. ● Statutory Rape: The institution has determined, based on good-faith research, that Wisconsin law does not define the term statutory rape.
Other "sexual assault" crimes	
Consent (as it relates to sexual activity)	<p>Under Wis. Stat. § 940.225(4), "consent" means words or overt actions by a person who is competent to give informed consent indicating a freely given agreement to have sexual intercourse or sexual contact. Consent is not an issue in alleged violations of sub. (2) (c), (cm), (d), (g), (h), and (i) [of the sexual assault laws set forth at Wis. Stat. § 940.225]. The following persons are presumed incapable of consent but the presumption may be rebutted by competent evidence, subject to the provisions of s. 972.11(2):</p>

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Crime Type (Wisconsin Statutes)	Definitions
	<p>(b) A person suffering from a mental illness or defect which impairs capacity to appraise personal conduct; (c) A person who is unconscious or for any other reason is physically unable to communicate unwillingness to an act.</p> <p>Also, under Wis. Stat. § 939.22(48), "without consent" means no consent in fact or that consent is given for one of the following reasons: (a) Because the actor put the victim in fear by the use or threat of imminent use of physical violence on the victim, or on a person in the victim's presence, or on a member of the victim's immediate family; or (b) Because the actor purports to be acting under legal authority; or (c) Because the victim does not understand the nature of the thing to which the victim consents, either by reason of ignorance or mistake of fact or of law other than criminal law or by reason of youth or defective mental condition, whether permanent or temporary.</p>

College Definition of Consent

The College uses the following definition of consent in its Sexual and Gender-Based Misconduct Policy for the purpose of determining whether sexual misconduct has occurred:

- **Consent** is:
 - knowing, and
 - voluntary, and
 - clear permissions
 - by word or action
 - to engage in sexual activity.
- Individuals may 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 given 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. Reasonable reciprocation can be implied. For example, if someone kisses you, you can kiss them back (if you want to) without the need to explicitly obtain their consent to being kissed back.
- Consent can also be withdrawn once given at any time during the duration of any activities. If consent is withdrawn, that sexual activity should cease immediately.
- Consent to some sexual contact (such as kissing or fondling) cannot be presumed to be consent for other sexual activity (such as intercourse). A current or previous intimate relationship is not sufficient to constitute consent.
- Proof of consent or non-consent is not a burden placed on either party involved in an incident. Instead, the burden remains on the College to determine whether its policy

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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 incident occurred and any similar, previous patterns that may be evidenced.
- Consent in relationships must also be considered in context. When parties consent to BDSM (bondage, discipline/dominance, submission/sadism, and masochism) or other forms of kink, non-consent may be shown by the use of a safe word. Resistance, force, violence, or even saying “no” may be part of the kink and thus consensual, so the College’s evaluation of communication in kink situations should be guided by reasonableness, rather than strict adherence to policy that assumes non-kink relationships as a default.

Risk Reduction

Risk reduction tips can often take a victim-blaming tone, even unintentionally. With no intention to victim-blame, and with recognition that only those who commit sexual violence are responsible for those actions, these suggestions may nevertheless help you to reduce your risk of experiencing a non-consensual sexual act. Suggestions offered:

- Make any of your limits known as early as possible.
- Tell a sexual aggressor "NO" clearly and firmly.
- Try to remove yourself from the physical presence of a sexual aggressor.
- Find someone nearby and ask for help.
- Take affirmative responsibility for your alcohol intake/drug use and acknowledge that alcohol/drugs lower your sexual inhibitions and may make you vulnerable to someone who views a drunk or high person as a sexual opportunity.
- Take care of your friends and ask that they take care of you. A real friend will challenge you if you are about to make a mistake. Respect them when they do.
- Be aware of someone trying to slip you an incapacitating “rape drug” like Rohypnol or GHB. If you find yourself in the position of being the initiator of sexual behavior, you owe sexual respect to your potential partner.

These suggestions may help you to reduce your risk for being accused of sexual misconduct:

- Clearly communicate your intentions to your sexual partner and give them a chance to clearly relate their intentions to you.
- Understand and respect sexual boundaries.
- **DON'T MAKE ASSUMPTIONS** about consent; about someone's sexual availability; about whether they are attracted to you; about how far you can go or about whether they are physically and/or mentally able to consent. If there are any questions or ambiguity then you **DO NOT** have consent.
- Mixed messages from your partner are a clear indication that you should stop, defuse any sexual tension and communicate better. You may be misreading them. They may not have figured out how far they want to go with you yet. You must respect the timeline for sexual behaviors with which they are comfortable. Don't take advantage of someone's drunkenness or drugged state, even if they did it to themselves.

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- Realize your potential partner could be intimidated by you, or fearful. You may have a power advantage simply because of your gender or size. Don't abuse that power.
- Understand that consent to some form of sexual behavior does not automatically imply consent to any other forms of sexual behavior.
- Silence and passivity cannot be interpreted as an indication of consent. Read your potential partner carefully, paying attention to verbal and non-verbal communication and body language.

Bystander Intervention

In addition to reporting incidents to appropriate authorities, below are some ways in which individuals can take safe and positive steps to prevent harm and intervene when there is a risk of dating violence, domestic violence, sexual assault, or stalking against another person.

- Look out for those around you.
- Realize that it is important to intervene to help others.
- Treat everyone respectfully. Do not be hostile or an antagonist.
- Be confident when intervening.
- Recruit help from others if necessary.
- Be honest and direct.
- Keep yourself safe.
- If things get out of hand, don't hesitate to contact Campus Safety or the police.

Other Information Covered by the PPAP

The PPAP also provides information on possible sanctions and protective measures that may be imposed following a determination that an offense of dating violence, domestic violence, sexual assault, or stalking has occurred, an explanation of the disciplinary procedures that will be followed when one of these offenses is alleged, the rights of the parties in such a proceeding, available resources, and other pertinent information. Much of this information is set forth in the upcoming sections of this security report.

Ongoing Prevention and Awareness Campaign:

The College also conducts an Ongoing Prevention and Awareness Campaign (OPAC) aimed at all students and employees. This campaign covers the same material as provided in the PPAP, but is intended to increase the understanding of students and employees on these topics and to improve their skills for addressing the offenses of dating violence, domestic violence, sexual assault and stalking.

PPAP and OPAC Programming Methods:

The PPAP and OPAC are carried out in a variety of ways, using a range of strategies, and, as appropriate, targeting specific audiences throughout the College. Methods include, but are not limited to: presentations, online training modules, distribution of written materials, periodic email blasts, and guest speakers. A summary of this programming is provided below.

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- New students receive education during the Northland Highways (first year experience) course on the prevention of dating violence, domestic violence, sexual assault, and stalking through presentation(s) by key campus constituents. Training on bystander intervention is also provided at this time. All new employees are required to complete an online training module on these topics upon hire and are required to retake online training each year.
- As part of its ongoing campaign, the College uses a variety of strategies, such as in-person presentations by sexual assault organizations, emails blasts with pertinent information, portal announcements, etc. While programming occurs throughout the year, the College also offers educational sessions and literature in coordination with nationally recognized observances such as Sexual Assault Awareness Month and Domestic Violence Awareness Month.
- Specific programming provided during 2019 included:

Name of Event	Sponsored by	Topics covered
RA/HRA training	Res Life	Title IX introduction, what to do if a report is received, car wreck mode video
Northland Highways	N. Highways class	Title IX introduction, policy definitions, and consent including cup of tea video, bystander intervention training
SOC 472 Advanced Justice Studies course	Sociology class	Answered Title IX related questions of the students, took notes of feedback, roundtable discussion
Sustainable Sex Night	Gaia's Cradle	Consent, sexual expectations, LGBTQ, toys, birth control/STD, menstruation: Potluck and discussion
Feminist Self Defense	NCSA	Self-defense, anti-violence empowerment. Lecture on sexist language and inclusivity, and workshop on self-defense: lecture and workshop
Domestic Violence Prevention and Awareness	Title IX	New Day Christa Grande and Sherriff's Department Amy O'Donahue covered domestic violence topics: roundtable discussion
Trafficking	Dept of Applied Learning	Mary Bonnett performance, empower audience and recognize and report signs of trafficking: reading followed by Q&A

Procedures to Follow if You are a Victim of Dating Violence, Domestic Violence, Sexual Assault, or Stalking:

If you are a victim of dating violence, domestic violence, sexual assault, or stalking, go to a safe place and call 911 or Campus Safety at 715-682-1399 or 715-209-6971. You may also contact a Title IX Coordinator by email at titleix@northland.edu or by phone:

- Title IX Coordinator, Michelle Bitzer, 715-682-1484
- Deputy Title IX Coordinator, Mackenzie Smith, 715-682-1245

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- Deputy Title IX Coordinator, Brock Splittgerber, 715-682-1677

Victims will be notified in writing of the procedures to follow, including:

1. To whom and how the alleged offense should be reported (contact the Title IX Coordinator or refer to the other resources listed in this report).
2. The importance of preserving evidence that may be necessary to prove the offense in a criminal proceeding or disciplinary action or to obtain a protective order.
3. The victim's options regarding notification to law enforcement, which are: (a) the option to notify either on-campus or local police; (b) the option to be assisted by campus security authorities in notifying law enforcement if the victim so chooses (the institution is obligated to comply with such a request if it is made); and (c) the option to decline to notify such authorities.
4. Where applicable, the rights of victims and the institution's responsibilities regarding orders of protection, no-contact orders, restraining orders, or similar lawful orders issued by a criminal, civil, or tribal court.

Preservation of Evidence & Forensic Examinations

Victims of physical assault are advised to not remove clothing items worn during or following an assault, as they frequently contain valuable fiber, hair, and fluid evidence. Don't bathe or wash, or otherwise clean the environment in which the assault occurred. You can obtain a forensic examination at Memorial Medical Center; 615 Maple Lane, Ashland, WI 54806; 715-685-5500.

Completing a forensic examination does not require you to file a police report, but having a forensic examination will help preserve evidence in case you decide at a later date to file a police report.

Victims are also advised to retain evidence in electronic formats (e.g., text messages, emails, photos, social media posts, screenshots, etc.). Such evidence is valuable in all situations, and it may be the only type of evidence available in instances of stalking.

Security/Law Enforcement & How to Make a Police Report

- Campus Safety: 715-682-1399 or 715-209-6971
- Ashland Police Department: 601 W Main Street, Ashland, WI 54806; 715-682-7062; Emergency: 911
- To make a police report, a victim should contact the local police agency listed above either by phone or in-person. The victim should provide as much information as possible, including name, address, and when and what occurred, to the best of the victim's ability.

Information about Legal Protection Orders

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In Wisconsin, victims may obtain a restraining order, which provides protective relief for victims of domestic violence, stalking, or sexual assault. Information about restraining orders may be found at: <https://www.doj.state.wi.us/ocvs/victim-rights/restraining-orders>.

The process is started by filing a petition for a temporary restraining order (TRO) with the court. Once a TRO petition is filed, the court decides whether or not to issue a TRO based on the information provided. If the court grants the TRO, the court will schedule an injunction hearing within 14 days, at which it is determined whether a final order of protection will be granted. Orders of this nature can be granted for up to 4 years.

- A petition can be filed with the Clerk of the Circuit Court of Ashland County at 201 W Main Street, Ashland, WI 54806 (715-682-7016). More information is available at: https://co.ashland.wi.us/circuit_court.
- The court can provide necessary forms, which are also found online at: <https://wicourts.gov/forms1/circuit/formcategory.jsp?Category=4>.
- Additional information regarding restraining orders in Wisconsin can be found at: <https://s3.us-east-2.amazonaws.com/wcasa/old-website-resources/Restraining%2BOrders%2Bfor%2BSexual%2BAssault%2BVictims2014.pdf>.

When a protection order is granted, it is enforceable statewide. If you have obtained a protection order and need it to be enforced in your area, you should contact the local police department.

The College will also enforce any temporary restraining order or other no contact order against the alleged perpetrator from a criminal, civil, or tribal court. Any student or employee who has a protection order or no contact order should notify the Title IX Coordinator and provide a copy of the restraining order so that it may be kept on file with the institution and can be enforced on campus, if necessary. Upon learning of any orders, the College will take all reasonable and legal action to implement the order.

The College does not issue legal orders of protection. However, as a matter of institutional policy, the institution may impose a no-contact, no-communication order between individuals in appropriate circumstances. The institution may also issue a “no trespass warning” if information available leads to a reasonable conclusion that an individual is likely to cause harm to any member of the campus community. A person found to be in violation of a No Trespass Warning may be arrested and criminally charged.

Available Victim Services:

Victims will be provided written notification about existing counseling, health, mental health, victim advocacy, legal assistance, visa and immigration assistance, student financial aid, and other services available to them, both within the College and in the surrounding community. Those services include:

College Resources

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- Northland Health Services: 715-682-1340 (<https://www.northland.edu/campus-life/services/health/>)
- Northland Counseling Services: 715-682-1369 (<https://www.northland.edu/campus-life/services/counseling/>)
- Student Welfare Coordinator: 715-682-1236
- Employee Assistance Program - contact Human Resources for more details (715-682-1841)
- Student Services – Sometimes a victim of a crime may feel the need to take a leave of absence from school. Information about an academic leave of absence can be found at <https://my.northland.edu/student-policies/academic-policies/>. If a student is considering a leave of absence based on the circumstances of a complaint, they should understand there may be financial aid implications in taking such leave. For further information, please contact the Registrar's office at 715-682-1227 or Financial Aid at 715-682-1255.

State/Local Resources

- Advocacy Assistance - Both Ashland County Sheriff's Department and the Center Against Sexual and Domestic Abuse (CASDA) have advocates available.
 - The CASDA Advocate is available to accompany you to the hospital, to the police department, to be with you when you talk to the police officers, or to provide you with guidance and support if you are the victim of sexual violence. CASDA can be reached at 1-800-649-2921. More information is available at: <https://casda.org/>.
 - The Victim Witness Advocate for Ashland County can be contacted in the Assistant District Attorney's Office during business hours (9 am - 5 pm) at 715-682-7019. The advocate can provide you with referral information and can also be a link between you and the legal system.
 - New Day Advocacy Center: Emergency assistance to victims of sexual assault and domestic violence, 24-hours crisis line, temporary housing and food, supportive counseling, advocacy services, 7 days/week, 365 days/year. Phone: 715-682-9565, toll-free 1-800-924-4132. More information is available at <http://www.ndshelter.org/services.html>
- Wisconsin Coalition Against Sexual Assault: <https://www.wcasa.org/>
- End Domestic Abuse Wisconsin: <https://www.endabusewi.org/>
- Memorial Medical Center: <https://ashlandmmc.com/>
- Memorial Medical Center - Behavioral Health Services: <https://ashlandmmc.com/services/behavioral-health/mental-health-services/>
- Legal Action Wisconsin: <https://www.legalaction.org/>

National Resources

- National Domestic Violence Hotline: 1-800-799-7233
- National Sexual Assault Hotline: 1-800-656-4673
- Rape, Abuse and Incest National Network (RAINN): <https://www.rainn.org/>
- US Dept. of Justice Office on Violence Against Women: <https://www.justice.gov/ovw>
- National Coalition Against Domestic Violence: <http://www.ncadv.org/>

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- National Sexual Violence Resource Center: <https://www.nsvrc.org/>
- U.S. Citizenship and Immigration Services: <https://www.uscis.gov/>
- Immigration Advocates Network: <https://www.immigrationadvocates.org/>

Accommodations and Protective Measures:

The College will provide written notification to victims about options for, and available assistance in, changing academic, living, transportation, and working situations or protective measures. If victims request these accommodations or protective measures and they are reasonably available the College is obligated to provide them, regardless of whether the victim chooses to report the crime to campus security or local law enforcement.

Requests for accommodations or protective measures should be made to the Title IX Administrator at 715-682-1484, and the Title IX Administrator is responsible for deciding what, if any, accommodations or protective measures will be implemented.

When determining the reasonableness of such a request, the College may consider, among other factors, the following: 1. The specific need expressed by the complainant. 2. The age of the students involved. 3. The severity or pervasiveness of the allegations 4. Any continuing effects on the complainant 5. Whether the complainant and alleged perpetrator share the same class or job location. 6. Whether other judicial measures have been taken to protect the complainant (e.g., civil protection orders).

The College will maintain as confidential any accommodations or protective measures provided a victim to the extent that maintaining confidentiality would not impair the College's ability to provide them. However, there may be times when certain information must be disclosed to a third party in order to implement the accommodation or protective measure. Such decisions will be made by the College in light of the surrounding circumstances, and disclosures of this nature will be limited so that only the information necessary to implement the accommodation or protective measure is provided. In the event it is necessary to disclose information about a victim in order to provide an accommodation or protective order, the College will inform the victim of that necessity prior to the disclosure, including which information will be shared, with whom it will be shared and why.

Allegations of dating violence, domestic violence, sexual assault or stalking will be processed through the College's Sexual and Gender-Based Misconduct Policy and Grievance Process for Alleged Violations of the Sexual and Gender-Based Harassment Policy. The complaint resolution procedures are invoked once a report is made to one of the following individuals:

Title IX Coordinator

Michelle Bitzer

715-682-1484

200 Ponzio Campus Center

mbitzer@northland.edu

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Deputy Title IX Coordinator

Mackenzie Smith

715-682-1245

Kendrigan Gymnasium 112

msmith@northland.edu

Deputy Title IX Coordinator

Brock Splittgerber

715-682-1677

Wakefield Hall

bsplittgerber@northland.edu

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GRIEVANCE PROCESS FOR ALLEGED VIOLATIONS OF THE SEXUAL AND GENDER-BASED HARASSMENT POLICY

1. Overview Northland College (the “College”) will act on any formal or informal notice/complaint of violation of the College's Policy on Sexual and Gender-Based Harassment (“the Policy”) that is received by the Title IX Coordinator or any other Official with Authority by applying these procedures, known as “Process A.”

The procedures below apply only to qualifying allegations of sexual harassment (including sexual assault, dating violence, domestic violence, and stalking, as defined above) involving students, staff, administrator, or faculty members.

If a dismissal occurs under Process A because the complaint does not contain qualifying allegations of sexual harassment, please see Appendix 1 which contains a description of the procedures applicable to the resolution of other offenses, referred to as “Process B.” Process B can also apply to sexual harassment (including sexual assault, dating violence, domestic violence, and stalking, as defined above) when jurisdiction does not fall within Process A, as determined by the Title IX Coordinator.

The procedures below may be used to address collateral misconduct arising from the investigation of or occurring in conjunction with reported misconduct (e.g., vandalism, physical abuse of another). All other allegations of misconduct unrelated to incidents covered by the Policy will be addressed through procedures described in the student code of conduct and/or the employee handbooks when applicable.

2. Notice/Complaint

Upon receipt of a complaint or notice to the Title IX Coordinator of an alleged violation of the Policy, the Title IX Coordinator initiates a prompt initial assessment to determine the next steps the College needs to take.

The Title IX Coordinator will initiate at least one of three responses:

- 1) Offering supportive measures because the Complainant does not want to file a formal complaint; and/or
- 2) An informal resolution (following the submission of a formal complaint); and/or
- 3) A Formal Grievance Process (according to Process A) including an investigation and a hearing (following submission of a formal complaint).

The College uses the Formal Grievance Process (Process A) to determine whether or not the Policy has been violated. If the College determines a violation occurred, the College will promptly implement effective remedies designed to ensure that it is not deliberately indifferent to sexual harassment or retaliation, their potential recurrence, or their effects.

3. Initial Assessment

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Following receipt of notice or a complaint of an alleged violation of this Policy, the Title IX Coordinator, or their designee, engages in an initial assessment, typically within one to five business days. The steps in an initial assessment can include:

- If notice is given, the Title IX Coordinator seeks to determine if the person impacted wishes to make a formal complaint, and will assist them to do so, if desired.
 - If they do not wish to file a formal complaint, the Title IX Coordinator determines whether to initiate a complaint because a risk assessment indicates a compelling threat to health and/or safety on campus.
- If a formal complaint is received, the Title IX Coordinator assesses its sufficiency and works with the Complainant to make sure it is correctly completed.
- The Title IX Coordinator reaches out to the Complainant to offer supportive measures.
- The Title IX Coordinator works with the Complainant to ensure they are aware of the right to have an Advisor. The College does not provide a Complainant or Respondent an advisor throughout the investigation process, but will provide an Advisor to either party for a hearing if the party does not already have an Advisor for purposes of the hearing.
- The Title IX Coordinator works with the Complainant to determine whether the Complainant prefers a supportive and remedial response, an informal resolution option, or a formal investigation and grievance process.
 - If a supportive and remedial response is preferred, the Title IX Coordinator works with the Complainant to identify their objectives, assesses any request(s), and implements whatever measures the Title IX Coordinator deems appropriate. No Formal Grievance Process is initiated, though the Complainant can elect to initiate one later, if desired.
 - If an informal resolution option is preferred, the Title IX Coordinator assesses whether the complaint is suitable for informal resolution, and if appropriate will ask if the Respondent is also willing to engage in informal resolution.
 - If a Formal Grievance Process is preferred, the Title IX Coordinator determines if the misconduct alleged falls within the scope of Title IX:
 - If it does fall within the scope of Title IX, the Title IX Coordinator will initiate the formal investigation and grievance process (Process A), directing the investigation to address:
 - an incident, and/or
 - a pattern of alleged misconduct, and/or
 - a culture/climate concern, based on the nature of the complaint.
 - If it does not fall within the scope of Title IX, the Title IX Coordinator will “dismiss” that aspect of the complaint, will assess which College policies may apply (if any), and will refer the matter for resolution under Process B.
 - Dismissing a complaint under Title IX on a procedural basis for lack of coverage under Title IX does not limit the College’s authority to address a complaint with an appropriate process and remedies.

a. Threat Assessment

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In many cases, the Title IX Coordinator may determine that a threat assessment should be conducted by the members of the Title IX Team (Title IX Coordinator, and/or Title IX Deputy Coordinator and/or

Official with Authority) as part of the initial assessment. As part of their threat assessment, the Team will review the complaint and any other relevant information to assess the threat posed by the reported conduct to the health and safety of the Complainant and/or the College community and determine whether external reports and/or interim measures are required. Among the information the Title IX Team may consider as part of their threat assessment is the following:

- The nature of the allegations in the complaint, including whether the allegations suggest physical violence, a pattern of misconduct, gender-based misconduct facilitated through the provision of drugs or alcohol, and/or gender-based misconduct against an unconscious or physically helpless individual;
- The responding party's prior record related to gender-based misconduct and/or violent behavior;
- The responding party's history, if any, of failing to comply with College protective measures and/or any judicial protective order;
- Whether the reported misconduct involved multiple respondents;
- Whether the reported misconduct involved a minor;
- Any indications that the report was made in bad faith;
- Any other aggravating circumstances or signs of predatory behavior; and/or
- Applicable law, policy, and procedure.
- Upon completion of the threat assessment, the Title IX Coordinator will make any mandated reports as required under applicable law (e.g., the Clery Act, VAWA).

A Respondent refusing to cooperate may result in a charge of failure to comply within the appropriate student or employee conduct process.

b. Dismissal (Mandatory and Discretionary)¹

The College must dismiss a formal complaint or any allegations therein if, at any time during the investigation or hearing, it is determined that:

- 1) The conduct alleged in the formal complaint would not constitute sexual harassment as defined above, even if proved; or
- 2) The conduct did not occur in an educational program or activity controlled by the College (including buildings or property controlled by recognized student organizations), or
- 3) The College does not have control of the Respondent; or
- 4) The conduct did not occur against a person in the United States; or

¹ These dismissal requirements are mandated by the 2020 Title IX Regulations, 34 CFR §106.45.

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5) At the time of filing a formal complaint, a complainant is not participating in or attempting to participate in the education program or activity of the College.²

The College may dismiss a formal complaint or any allegations therein if, at any time during the investigation or hearing:

1) A Complainant notifies the Title IX Coordinator in writing that the Complainant would like to withdraw the formal complaint or any allegations therein; or

2) The Respondent is no longer enrolled in or employed by the College; or

3) Specific circumstances prevent the College from gathering evidence sufficient to reach a determination as to the formal complaint or allegations therein. Upon any dismissal, the College will promptly send written notice of the dismissal and the rationale for doing so simultaneously to the parties.

This dismissal decision is appealable by any party under the procedures for appeal below. A Complainant who decides to withdraw a complaint may later request to reinstate it or refile it.

4. Counterclaims

The College is obligated to ensure that the grievance process is not abused for retaliatory purposes. The College permits the filing of counterclaims but uses an initial assessment, described above, to assess whether the allegations in the counterclaim are made in good faith. Counterclaims by a Respondent may be made in good faith, but are, on occasion, also made for purposes of retaliation. Counterclaims made with retaliatory intent will not be permitted. Counterclaims determined to have been reported in good faith will be processed using the appropriate grievance procedure outlined below (Process A if applicable, otherwise Process B). Investigation of such claims may take place after resolution of the underlying initial allegation, in which case a delay may occur. Counterclaims may also be resolved through the same investigation as the underlying allegation, at the discretion of the Title IX Coordinator. When counterclaims are not made in good faith, they will be considered retaliatory and may constitute a violation of this policy.

5. Right to an Advisor

The parties may each have an Advisor³ of their choice present with them for all meetings, interviews, and hearings within the grievance process, if they so choose. The parties may select whoever they wish to serve as their Advisor as long as the Advisor is eligible and available.⁴

² Such a Complainant is still entitled to supportive measures, but the formal grievance process (Process A) is not applicable.

³ This could include an attorney, advocate, or support person. The law permits at least one Advisor for each party (witnesses are not entitled to Advisors within the process).

⁴ “Available” means the party cannot insist on an Advisor who doesn’t have time or availability to participate in the formal grievance process. Also, the Advisor cannot have a conflict of interest (as determined by the Title IX Team), such as being a Title IX administrator who has an active role in the matter, or a supervisor who must monitor and implement sanctions.

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Choosing an Advisor who is also a witness in the process creates potential for bias and conflict-of interest. A party who chooses an Advisor who is also a witness can anticipate that issues of potential bias will be explored by the hearing Decision-makers.

The College may permit parties to have more than one Advisor upon special request to the Title IX Coordinator. The decision to grant this request is at the sole discretion of the Title IX Coordinator and will be granted equitably to all parties. As noted above, the College does not provide a Complainant or Respondent an Advisor throughout the investigation process, but will provide an Advisor to either party for a hearing if a party does not already have an Advisor for purposes of the hearing.

a. Who Can Serve as an Advisor

The Advisor may be a friend, mentor, family member, attorney, or any other individual a party chooses to advise, support, and/or consult with a party throughout the grievance process. The parties may choose Advisors from inside or outside of the College community when a conflict of interest is not present.

If an investigation proceeds to the hearing stage, the Title IX Coordinator will assign a trained Advisor for any party that requests one. The requesting party will be given the opportunity to choose an individual from the College's Advisor pool. The Advisor will be trained by the College and have familiarity with the College's grievance process.

If the parties choose an Advisor from outside the pool of those identified by the College, the Advisor may not have been trained by the College and may not be familiar with College policies and procedures.

Parties also have the right to choose not to have an Advisor in the initial stages of the grievance process, prior to a hearing.

b. Advisor's Role in Meetings and Interviews

The parties may be accompanied by their Advisor in all meetings and interviews at which the party is entitled to be present, including intake and interviews. Advisors are expected to advise ethically, with integrity, and in good faith.

The College cannot guarantee equal Advisory rights, meaning that 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.

Advisors or attorneys are permitted to fully represent their advisees or clients in the grievance proceedings, including all meetings, interviews, and hearings. Although the College prefers to hear from parties directly, in these cases, parties are entitled to have evidence provided by their chosen representatives.

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c. Advisors in Hearings/College-Appointed Advisor

Under U.S. Department of Education's Title IX regulations, the parties are not permitted to directly question each other or any witnesses. If a party does not have an Advisor for a hearing, the College will appoint a trained Advisor for the limited purpose of conducting any questioning of the other party and witnesses.

A party may reject this appointment and choose their own Advisor, but they may not proceed in a hearing without an Advisor. If the party's Advisor will not conduct questioning, the College will appoint an Advisor who will do so, regardless of the participation or non-participation of the advised party in the hearing itself.

d. Pre-Interview Meetings

Advisors may request to meet with the administrative officials conducting interviews/meetings in advance of these interviews or meetings. This pre-meeting allows Advisors to clarify and understand their role and the College's policies and procedures.

f. Advisor Violations of College Policy

All Advisors are subject to the same College policies and procedures, whether they are attorneys or not. Advisors are expected to advise their advisees without disrupting proceedings. Advisors should not address College officials in a meeting or interview unless invited to (e.g., asking procedural questions). The Advisor may not speak on behalf of their advisee during any meeting or proceeding and may not speak on behalf of the advisee to the Investigator(s) or other Decision-maker except during a hearing proceeding during cross-examination of a party or witness.

The parties are expected to ask/respond to questions on their own behalf throughout the investigation phase of the grievance process. Although the Advisor generally may not speak on behalf of their advisee, the Advisor may consult with their advisee. For longer or more involved discussions, the parties and their Advisors should ask for breaks to allow for private consultation.

Any Advisor who oversteps their role as defined by this policy will be warned only once. If the Advisor continues to disrupt or otherwise fails to respect the limits of the Advisor role, the meeting will be ended, or other appropriate measures implemented. The Title IX Coordinator will determine how to address the Advisor's non-compliance and future role (if any) in the grievance process.

g. Sharing Information with the Advisor

The College expects that the parties may wish to have the College share documentation and evidence related to the allegations with their Advisors. Parties may share this information directly with their Advisor if they wish to do so.

The College also provides a consent form that authorizes the College to share such information directly with their Advisor. The parties must either complete and submit this

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form to the Title IX Coordinator or provide similar documentation demonstrating consent to release information to the Advisor before the College is able to share records with an Advisor.

If a party requests that all communication related to the grievance process be made through their attorney Advisor, the College will generally adhere to that request at the discretion of the Title IX Coordinator.

h. Privacy of Records Shared with Advisor

Advisors are expected to maintain the privacy of the records shared with them. These records may not be shared with third parties, disclosed publicly, or used for purposes not explicitly authorized by the College. The College may seek to 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 privacy expectations.

i. Expectations of an Advisor

The College generally expects an Advisor to adjust their schedule to allow them to attend grievance process meetings when planned, but may change scheduled meetings 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 attend in person to attend a meeting by telephone, video conferencing, or other similar technologies as may be appropriate and available.

j. Expectations of the Parties with Respect to Advisors

A party may elect to change Advisors during the process and is not obligated to use the same Advisor throughout. The parties are expected to inform the Investigator(s) of the identity of their Advisor at least two (2) business days before the date of their first meeting with Investigator(s) (or as soon as possible if a more expeditious meeting is necessary or desired).

The parties are expected to provide timely notice to the Title IX Coordinator if they change Advisors at any time. It is assumed that if a party changes Advisors, consent to share information with the previous Advisor is terminated, and a release for the new Advisor must be secured. Parties are expected to inform the Title IX Coordinator of the identity of their hearing Advisor at least two (2) business days before the hearing.

k. Assistance in Securing an Advisor

Local resources include:

- New Day Advocacy Center, Ashland (<http://www.ndshelter.org/>)
- Domestic Violence/Sexual Assault Officer, Amy O'Donahue (Ashland County Sheriff's Department)
- Center Against Sexual and Domestic Abuse – CASDA, Washburn (<https://casda.org/services/>)

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National resources include:

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

7. Informal Resolution

Informal Resolution can include three different approaches:

- When the Title IX Coordinator can resolve the matter informally by providing supportive measures (only) to remedy the situation;
- When the Respondent accepts responsibility for violating policy, and desires to accept a sanction and end the grievance process; or
- A negotiated resolution.

To initiate Informal Resolution, a Complainant needs to submit a formal complaint, as defined above. A Respondent who wishes to initiate Informal Resolution should contact the Title IX Coordinator.

It is not necessary to pursue Informal Resolution first in order 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.

Prior to implementing Informal Resolution, the College will provide the parties with written notice of the reported misconduct and any sanctions or measures that may result from participating in such a process, including information regarding any records that will be maintained or shared by the College.

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.

b. 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 grievance 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, sanctions, and/or remedies. If so, the Title IX Coordinator implements the accepted finding that the Respondent is in violation of College policy and implements agreed-upon sanctions and/or remedies, in coordination with other appropriate administrator(s), as necessary.

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This result is not subject to appeal once all parties indicate their written assent to all agreed upon terms of resolution. 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 or responsive actions are promptly implemented by the Title IX Coordinator in order to effectively stop the sexual harassment or retaliation, prevent its recurrence, and remedy the effects of the discriminatory conduct, both on the Complainant and the community.

c. Negotiated Resolution

The Title IX Coordinator, with the consent of the parties, may negotiate and implement an agreement to resolve the allegations that satisfies all parties and the College. Negotiated Resolutions are not appealable. A negotiated resolution will not be pursued or utilized when a student files a formal complaint alleging sexual harassment by a College employee.

8. Grievance Process Roster

The Formal Grievance Process relies on a roster of administrators (“the Roster”) to carry out the process.

a. Roster Member Roles

Members of the Roster are trained annually, and can serve in in the following roles, at the direction of the Title IX Coordinator:

- To provide appropriate intake of and initial guidance pertaining to complaints
- To act as an Advisor to the parties
- To perform or assist with initial assessment
- To investigate complaints
- To serve as a hearing facilitator (process administrator, non-decision-making role)
- To serve as a Decision-maker regarding the complaint
- To serve as an Appeal Decision-maker

b. Roster Member Training

The Roster members receive annual training based on their respective roles. This training includes, but is not limited to:

- The scope of the College’s Sexual and Gender Based Misconduct Policy and Procedures
- How to conduct investigations and hearings that protect the safety of Complainants and Respondents, and promote accountability
- Implicit bias
- Disparate treatment and impact
- Reporting, confidentiality, and privacy requirements
- Applicable laws, regulations, and federal regulatory guidance

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- How to implement appropriate and situation-specific remedies
- How to investigate in a thorough, reliable, and impartial manner
- How to uphold fairness, equity, and due process
- How to weigh evidence
- How to conduct questioning
- How to assess credibility
- Impartiality and objectivity
- How to render findings and generate clear, concise, evidence-based rationales
- The definitions of all offenses
- How to apply definitions used by the College with respect to consent (or the absence or negation of consent) consistently, impartially, and in accordance with policy
- How to conduct an investigation and grievance process including hearings, appeals, and informal resolution processes
- How to serve impartially by avoiding prejudgment of the facts at issue, conflicts of interest, and bias
- Any technology to be used at a live hearing
- Issues of relevance of questions and evidence
- Issues of relevance to create an investigation report that fairly summarizes relevant evidence
- How to determine appropriate sanctions in reference to all forms of harassment and/or retaliation allegations
- Recordkeeping

Specific training is also provided for Appeal Decision-makers, Advisors (who may be College employees), and Decision-makers. All Roster members are required to attend these trainings annually. The materials used to train all members of the Roster are publicly posted here: <https://www.northland.edu/campuslife/services/safety/#title-ix-sexual-respect>.

d. Roster Membership

The Roster includes:

- 2 Decision-makers, one representative from human resources and one from student affairs, who lead the hearings for allegations involving employee and student respondents, respectively.
- 8 or more employees, including at least 3 faculty members and at least 2 employees from the College's athletic department, who will be called in as investigators. Employee roster members are usually appointed to three-year terms.

Individuals who are interested in serving in this volunteer capacity are encouraged to contact the Title IX Coordinator.

9. Formal Grievance Process: Notice of Investigation and Allegations

The Title IX Coordinator will provide written notice of the investigation and allegations (the "NOIA") to the Respondent upon commencement of the Formal Grievance Process. This facilitates the Respondent's ability to prepare for the interview and to identify and choose an

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Advisor to accompany them. The NOIA is also copied to the Complainant, who is to be given advance notice of when the NOIA will be delivered to the Respondent.

The NOIA will include:

- A meaningful summary of all of allegations,
- The identity of the involved parties (if known),
- The precise misconduct being alleged,
- The date and location of the alleged incident(s) (if known),
- The specific policies implicated,
- A description of the applicable procedures,
- A statement of the potential sanctions/responsive actions that could result,
- 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 to inspect and review all directly related and/or relevant evidence obtained during the review and comment period,

- A statement about the College's policy on retaliation,
- Information about the privacy of the process,
- Information on the ability for each party to have an Advisor of their choosing and suggestions for ways to identify an Advisor,
- A statement informing the parties that the College's Policy prohibits knowingly making false statements, including knowingly submitting false information during the grievance process,
- Detail on how a party may request disability accommodations during the formal grievance process,
- The name(s) of the Investigator(s), along with a process to identify, in advance of the interview process, any alleged conflict of interest that the Investigator(s) may have to the Title IX Coordinator, and
- An instruction to preserve any evidence that is directly related to the allegations.

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 charges.

Notice will be made in writing and may be delivered by one or more of the following methods: in person, placed in the student's campus mailbox, or emailed to the parties' College-issued email or designated accounts. Once mailed, emailed, and/or received in-person, notice will be presumptively delivered.

10. Grievance Process Timeline

The College will make a good faith effort to complete the grievance process within a sixty-to-ninety (60-90) business day time period, including appeal, which can be extended as necessary by the Title IX Coordinator, who will provide notice and rationale for any extensions or

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delays to the parties as appropriate, as well as an estimate of how much additional time will be needed to complete the process.

11. Appointment of Investigators

Once the decision to commence a formal investigation is made, the Title IX Coordinator appoints two investigators to conduct the investigation, usually within two (2) business days of determining that an investigation should proceed.

12. Ensuring Impartiality

Any individual materially involved in the administration of the grievance process, including the Title IX Coordinator, Investigators, and Decision-makers, may neither have nor demonstrate a conflict of interest or bias for a party generally, or for a specific Complainant or Respondent.

The Title IX Coordinator will vet the assigned Investigators to ensure impartiality by ensuring there are no actual or apparent conflicts of interest or disqualifying biases. The parties may, at any time during the process, raise a concern regarding bias or conflict of interest, and the Title IX Coordinator will determine whether the concern is valid. If the Title IX Coordinator determines a valid concern regarding a potential bias or conflict of interest is present, another Roster 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 Title IX Coordinator, concerns should be raised with the Chief of Staff.

The Formal Grievance Process involves an objective evaluation of all relevant evidence obtained, 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.

The College operates with the presumption that the Respondent is not responsible for the reported misconduct unless and until the Respondent is determined to be responsible for a policy violation by the applicable standard of proof following a hearing.

13. Investigation Timeline

Investigations are completed expeditiously, normally within thirty (30) business days, though some investigations may take additional weeks or even months, depending on the nature, extent, and complexity of the allegations, availability and cooperation of witnesses, police involvement, etc.

The College will make a good faith effort to complete investigations as promptly as circumstances permit and will communicate regularly with the parties to update them on the progress and timing of the investigation.

14. Delays in the Investigation Process and Interactions with Law Enforcement

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The College may undertake a short delay in its investigation (several days to a few weeks) 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 accommodations for disabilities or health conditions.

The College will communicate in writing the anticipated duration of the delay and reason(s) for it to the parties and provide the parties with status updates if necessary. The College will promptly resume its investigation and grievance process as soon as feasible. During such a delay, the College will implement supportive measures as deemed appropriate by the Title IX Coordinator.

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.

15. Steps in the Investigation Process

All investigations will be thorough, reliable, impartial, prompt, and fair. Investigations involve interviews with relevant parties and witnesses; obtaining available, relevant evidence; and identifying sources of expert information, as necessary.

All parties will have a full and fair opportunity, through the investigation process, to suggest witnesses and questions, to provide evidence and expert witnesses, and to fully review and respond to all evidence on the record.

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

- Identify all policies implicated by the alleged misconduct and notify the Complainant and Respondent of all of the specific policies implicated
- Identify issues and develop a strategic investigation plan, including a witness list, evidence list, intended investigation timeframe, and order of interviews for all witnesses and the parties
- Meet with the Complainant to finalize their interview/statement, if necessary
- Provide each interviewed party and witness an opportunity to review and verify the Investigator's summary notes (or transcript) of the relevant evidence/testimony from their respective interviews and meetings
- Make good faith efforts to notify the parties of any meeting or interview involving the other party, in advance when possible
- When participation of a party is expected, provide that party with written notice of the date, time, and location of the meeting, as well as the expected participants and purpose
- Interview all available, relevant witnesses and conduct follow-up interviews as necessary
- Allow each party the opportunity to suggest witnesses and questions they wish the Investigators to ask of the other party and witnesses, and document in the

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investigation report which questions were asked, with a rationale for any changes or omissions

- Complete the investigation promptly and without unreasonable deviation from the investigation timeline
- Provide regular status updates to the parties throughout the investigation
- Prior to the conclusion of the investigation, provide the parties and their respective Advisors (if so desired by the parties) with a list of witnesses whose information will be used in the investigation report
- Write a comprehensive investigation report fully summarizing the investigation, all witness interviews, and addressing all relevant evidence. Appendices, including relevant physical or documentary evidence, will be included
- Gather, assess, and synthesize evidence, but make no conclusions, engage in no policy analysis, and render no recommendations as part of the investigation report
- Prior to the conclusion of the investigation, provide the parties and their respective Advisors (if so desired by the parties) a secured electronic or hard copy of the draft investigation report as well as an opportunity to inspect and review all of the evidence obtained as part of the investigation that is directly related to the reported misconduct, including evidence upon which the College does not intend to rely in reaching a determination, for a ten (10) business day review and comment period so that each party may meaningfully respond to the evidence. The parties may elect to waive the full ten days. Each copy of the materials shared will be watermarked on each page with the role of the person receiving it (e.g., Complainant, Respondent, Complainant's Advisor, and Respondent's Advisor).
- The Investigators may elect to amend the investigation report based on the parties' submitted responses and/or to share the responses between the parties for additional responses
- The Investigators will incorporate relevant elements of the parties' written responses into the final investigation report, include any additional relevant evidence, make any necessary revisions, and finalize the report. The Investigator(s) should document all rationales for any changes made after the review and comment period
- The final report will then be shared with all parties, their Advisors, and the Title IX coordinator through secure electronic transmission or hard copy at least ten (10) business days prior to a hearing. The parties are also provided with a file of any directly related evidence that was not included in the report

16. Role and Participation of Witnesses in the Investigation

Witnesses (as distinguished from the parties) who are employees of the College are expected to cooperate with and participate in the College's investigation and grievance process. Failure of such witnesses to cooperate with and/or participate in the investigation or grievance process constitutes a violation of policy and may warrant discipline.

Although in-person interviews for parties and all potential witnesses are ideal, circumstances (e.g., study abroad, summer break) may require individuals to be interviewed remotely. GoToMeeting, Zoom, FaceTime, Microsoft Teams, or similar technologies may be used for interviews if the Investigator(s) determine that timeliness or efficiency dictate a need for remote interviewing. The College will take appropriate steps to reasonably ensure the security/privacy of remote interviews.

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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. If a witness submits a written statement but does not intend to be and is not present for cross examination at a hearing, their written statement may not be used as evidence.

17. Recording of Interviews

No unauthorized audio or video recording of any kind is permitted during investigation meetings. If the Investigator(s) elect to audio and/or video record interviews, all involved parties must be made aware of any such audio and/or video recording.

18. Evidentiary Considerations in the Investigation

The investigation does not consider: 1) incidents not directly related to the possible violation, unless they evidence a pattern; 2) the character of the parties; or 3) questions and evidence about the Complainant's sexual predisposition or prior sexual behavior, unless such questions and evidence about the Complainant's prior sexual behavior are offered to prove that someone other than the Respondent committed the conduct alleged by the Complainant, or if the questions and evidence concern specific incidents of the Complainant's prior sexual behavior with respect to the Respondent and are offered to prove consent.

19. Referral for Hearing
Provided that the complaint is not resolved through Informal Resolution, once the final investigation report is shared with the parties, the Title IX Coordinator will refer the matter for a hearing.

The hearing must be scheduled at least ten (10) business days from the conclusion of the investigation – when the final investigation report is transmitted to the parties and the Decision-maker—unless all parties and the Decision-maker agree to an expedited timeline.

The Title IX Coordinator will select an appropriate Decision-maker depending on whether the Respondent is an employee or a student. Allegations involving student-employees in the context of their employment will be directed to the appropriate Decision-maker depending on the context and nature of the alleged misconduct.

20. Hearing Decision-maker Composition

The College will designate a single Decision-maker. The single Decision-maker will also lead the hearing. The Decision-maker will not have had any previous involvement with the investigation. The Title IX Coordinator may elect to have an alternate from the Roster sit in throughout the hearing process in the event that a substitute is needed for any reason.

Those who have served as Investigators will be witnesses in the hearing and therefore may not serve as Decision-makers. Those who are serving as Advisors for any party may not serve as Decision-makers in that matter.

The Title IX Coordinator may not serve as a Decision-maker in the matter but may serve as an administrative facilitator of the hearing if their previous role(s) in the matter do not create

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a conflict of interest. Otherwise, a designee may fulfill this role. The hearing will convene at a time determined by the Decision-maker or designee.

21. Evidentiary Considerations in the Hearing

Any evidence that the Decision-maker determines is relevant and credible may be considered in issuing a determination of responsibility. The Decision-maker does not consider: 1) incidents not directly related to the possible violation, unless they evidence a pattern; 2) the character of the parties; or 3) questions and evidence about the Complainant's sexual predisposition or prior sexual behavior, unless such questions and evidence about the Complainant's prior sexual behavior are offered to prove that someone other than the Respondent committed the conduct alleged by the Complainant, or if the questions and evidence concern specific incidents of the Complainant's prior sexual behavior with respect to the Respondent and are offered to prove consent.

Previous disciplinary action of any kind involving the Respondent may be considered in determining an appropriate sanction upon a determination of responsibility. This information is only considered at the sanction stage of the process and is not shared until then.

The parties may each submit a written impact statement prior to the hearing for the consideration of the Decision-maker at the sanction stage of the process when a determination of responsibility is reached.

After post-hearing deliberation, the Decision-maker renders a determination based on the preponderance of the evidence standard (i.e., whether it is more likely than not that the Respondent violated the Policy as alleged).

21. Notice of Hearing

No less than ten (10) business days prior to the hearing, the Title IX Coordinator or the Decision-maker will send notice of the hearing to the parties. Once mailed, emailed, and/or received in-person, notice will be presumptively delivered.

The notice will contain:

- A description of the alleged violation(s), a list of all policies allegedly violated, a description of the applicable procedures, and a statement of the potential sanctions/responsive actions that could result.
- The time, date, and location of the hearing and a reminder that attendance is mandatory, superseding all other campus activities.
- Any technology that will be used to facilitate the hearing.
- Information about the option for the live hearing to occur with the parties located in separate rooms using technology that enables the Decision-maker and parties to see and hear a party or witness answering questions. A request for such options must be raised with the Title IX Coordinator at least five (5) business days prior to the hearing.
- A list of all those who will attend the hearing, along with an invitation to object to any Decision maker on the basis of demonstrated bias. This must be raised with the Title IX Coordinator at least two (2) business days prior to the hearing.

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- Information on how the hearing will be recorded and on access to the recording for the parties after the hearing.
- A statement that if any party or witness does not appear at the scheduled hearing, the hearing may be held in their absence, and the party's or witness's testimony and any statements given prior to the hearing will not be considered by the Decision-maker. For compelling reasons, the Decision-maker may reschedule the hearing at the Decision-maker's sole discretion.
- Notification that the parties may have the assistance of an Advisor of their choosing at the hearing and will be required to have one present for any questions they may desire to ask of a party or witness. The party must notify the Title IX Coordinator if they do not have an Advisor, and the College will appoint one for the hearing. Each party must have an Advisor present for the hearing. There are no exceptions.
- A copy of all the materials provided to the Decision-maker about the matter, unless they have been provided already.⁵
- An invitation to each party to submit to the Decision-maker an impact statement pre-hearing that the Decision-maker will review during any sanction determination.
- An invitation to contact the Title IX Coordinator to arrange any disability accommodations, language assistance, and/or interpretation services that may be needed at the hearing, at least seven (7) business days prior to the hearing.
- Whether parties can/cannot bring mobile phones/devices into the hearing.

Hearings for possible violations that occur near or after the end of an academic term (assuming the Respondent is still subject to this Policy) and are unable to be resolved prior to the end of term will typically be held immediately after the end of the term or during the summer, as needed, to meet the

Timeline followed by the College and remain within the 60-90 business day goal for completion.

In these cases, if the Respondent is a graduating student, a hold may be placed on graduation and/or official transcripts until the matter is fully resolved (including any appeal). A student facing charges under this Policy is not in good standing to graduate.

23. Alternative Hearing Participation Options

If a party or parties prefer not to attend or cannot attend the hearing in person, the party should request alternative arrangements from the Title IX Coordinator or the Decision-maker at least five (5) business days prior to the hearing.

The Title IX Coordinator or the Decision-maker can arrange to use technology to allow remote testimony without compromising the fairness of the hearing. Remote options may also be needed for witnesses who cannot appear in person. Any witness who cannot attend in person should let the Title IX Coordinator or the Decision-maker know at least five (5) business days prior to the hearing so that appropriate arrangements can be made.

⁵ The final investigation report may be shared using electronic means that preclude downloading, forwarding, or otherwise sharing.

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24. Pre-Hearing Preparation

The Decision-maker or hearing facilitator after any necessary consultation with the parties, Investigators and/or Title IX Coordinator, will provide the names of persons who will be participating in the hearing, all pertinent documentary evidence, and the final investigation report to the parties at least ten (10) business days prior to the hearing.

Any witness scheduled to participate in the hearing must have been first interviewed by the Investigators, unless all parties and the Decision-maker assent to the witness's participation in the hearing. The same holds for any evidence that is first offered at the hearing. If the parties and Decision maker do not assent to the admission of evidence newly offered at the hearing, the Decision-maker may delay the hearing and instruct that the investigation needs to be re-opened to consider that evidence and/or bar the admission of the evidence.

The parties will be given a list of the names of the Decision-maker at least five (5) business days in advance of the hearing. All objections to any Decision-maker must be raised in writing, detailing the rationale for the objection, and must be submitted to the Title IX Coordinator as soon as possible and no later than two days prior to the hearing. Decision-makers will only be removed if the Title IX Coordinator concludes that their bias or conflict of interest precludes an impartial hearing of the allegation(s).

The Title IX Coordinator will give the Decision-maker a list of the names of all parties, witnesses, and Advisors at least five (5) business days in advance of the hearing. Any Decision-maker who cannot make an objective determination must recuse themselves from the proceedings when notified of the identity of the parties, witnesses, and Advisors in advance of the hearing. If a Decision-maker is unsure of whether a bias or conflict of interest exists, they must raise the concern to the Title IX Coordinator as soon as possible.

During the ten (10) business day period prior to the hearing, the parties have the opportunity for continued review and comment on the final investigation report and available evidence. That review and comment can be shared with the Decision-maker at the pre-hearing meeting or at the hearing and will be exchanged between each party by the Decision-maker.

25. Pre-Hearing Meetings

The Decision-maker may convene a pre-hearing meeting(s) with the parties and their Advisors to invite them to submit the questions or topics they (their Advisors) wish to ask or discuss at the hearing, so that the Decision-maker can rule on their relevance ahead of time to avoid any improper evidentiary introduction in the hearing or provide recommendations for more appropriate phrasing. However, this advance review opportunity does not preclude the Advisors from asking a question for the first time at the hearing or from asking for a reconsideration based on any new information or testimony offered at the hearing. The Decision-maker must document and share with each party their rationale for any exclusion or inclusion at a pre-hearing meeting.

At each pre-hearing meeting with a party and their Advisor, the Decision-maker will consider arguments that evidence identified in the final investigation report as relevant is, in fact, not

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relevant. Similarly, evidence identified as directly related but not relevant by the Investigators may be argued to be relevant.

The Decision-maker may rule on these arguments pre-hearing and will exchange those rulings between the parties prior to the hearing to assist in preparation for the hearing. The Decision-maker may consult with legal counsel and/or the Title IX Coordinator or ask either or both to attend pre-hearing meetings.

The pre-hearing meeting(s) will be recorded.

26. Hearing Procedures

At the hearing, the Decision-maker has the authority to hear and make determinations on all allegations of sexual harassment and/or retaliation and may also hear and make determinations on any additional alleged policy violations that have occurred in concert with the sexual harassment and/or retaliation, even though those collateral allegations may not specifically fall within the Policy.

Participants at the hearing will include the Decision-maker, the hearing facilitator/Title IX Coordinator if needed, the Investigators who conducted the investigation, the parties, Advisors to the parties, any called witnesses, and anyone providing authorized accommodations or assistive services.

The Decision-maker will answer all questions of procedure. Anyone appearing at the hearing to provide information will respond to questions on their own behalf.

The Decision-maker will allow witnesses who have relevant information to appear at a portion of the hearing in order to respond to specific questions from the Decision-maker and the parties, and will then be excused.

27. Joint Hearings

In hearings involving more than one Respondent or in which two (2) or more Complainants have accused the same individual of substantially similar conduct, the default procedure will be to hear the allegations jointly.

However, the Title IX Coordinator may permit the investigation and/or hearings pertinent to each Respondent to be conducted separately if there is a compelling reason to do so. In joint hearings, separate determinations of responsibility will be made for each Respondent and with respect to each alleged policy violation.

28. The Order of the Hearing – Introductions and Explanation of Procedure

The Decision-maker explains the procedures and introduces the participants. This may include a final opportunity for challenge or recusal of the Decision-maker on the basis of bias or conflict of interest. The Decision-maker will rule on any such challenge unless the Decision-maker is the individual who is the subject of the challenge, in which case the Title IX Coordinator will review and decide the challenge.

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At the hearing, recording, witness logistics, party logistics, curation of documents, separation of the parties, and other administrative elements of the hearing process are managed by the hearing facilitator. The hearing facilitator may attend to: logistics of rooms for various parties/witnesses as they wait; flow of parties/witnesses in and out of the hearing space; ensuring recording and/or virtual conferencing technology is working as intended; copying and distributing materials to participants, as appropriate, etc.

29. Investigator Presents the Final Investigation Report

The Investigators will then present a summary of the final investigation report, including items that are contested and those that are not, and will be subject to questioning by the Decision-maker and the parties (through their Advisors). The Investigators will be present during the entire hearing process, but not during deliberations.

Neither the parties nor the Decision-maker should ask the Investigator(s) their opinions on credibility, recommended findings, or determinations. The Investigator(s), Advisors, and parties will refrain from discussion of or questions about credibility assessments. If such information is introduced, the Decision maker will direct that it be disregarded.

30. Testimony and Questioning

Once the Investigator(s) present their report and are questioned, the parties and witnesses may provide relevant information in turn, beginning with the Complainant, and then in the order determined by the Decision-maker. The parties/witnesses will submit to questioning by the Decision-maker and then by the parties through their Advisors (“cross-examination”).

All questions are subject to a relevance determination by the Decision-maker. The Advisor, who will remain seated during questioning, will pose the proposed question orally, electronically, or in writing (orally is the default, but other means of submission may be permitted by the Decision-maker upon request if agreed to by all parties and the Decision-maker), the proceeding will pause to allow the Decision-maker to consider it (and state it if it has not been stated aloud), and the Decision-maker will determine whether the question will be permitted, disallowed, or if it must be rephrased.

The Decision-maker may invite explanations or persuasive statements regarding relevance with the Advisors, if the Decision-maker so chooses. The Decision-maker will then state their decision on the question for the record and advise the party/witness to whom the question was directed, accordingly. The Decision-maker will explain any decision to exclude a question as not relevant, or to reframe it for relevance.

The Decision-maker will limit or disallow questions on the basis that they are irrelevant, unduly repetitious (and thus irrelevant), or abusive. The Decision-maker has final say on all questions and determinations of relevance. The Decision-maker may consult with legal counsel on any questions of admissibility. The Decision-maker may ask Advisors to frame why a question is or is not relevant from their perspective but will not entertain argument from the Advisors on relevance once the Decision maker has ruled on a question.

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If the parties raise an issue of bias or conflict of interest of an Investigator or Decision-maker at the hearing, the Decision-maker may elect to address those issues, consult with legal counsel, and/or refer them to the Title IX Coordinator, and/or preserve them for appeal. If bias is not in issue at the hearing, the Decision-maker should not permit irrelevant questions that probe for bias.

31. Refusal to Submit to Cross-Examination and Inferences If a party or witness chooses not to submit to cross-examination at the hearing, either because they do not attend the meeting, or they attend but refuse to participate in questioning, then the Decision-maker may not rely on any prior statement made by that party or witness at the hearing (including those contained in the investigation report) in the ultimate determination of responsibility. The Decision maker must disregard that statement. Evidence provided that is something other than a statement by the party or witness may be considered.

If the party or witness attends the hearing and answers some cross-examination questions, only statements related to the cross-examination questions they refuse to answer cannot be relied upon. However, if the statements of the party who is refusing to submit to cross-examination or refuses to attend the hearing are the subject of the allegation itself (e.g., the case is about verbal harassment or a quid pro quo offer), then those statements are not precluded from admission.

The Decision-maker may not draw any inference solely from a party's or witness's absence from the hearing or refusal to answer cross-examination or other questions.

If charges of policy violations other than sexual harassment are considered at the same hearing, the Decision-maker may consider all evidence it deems relevant, may rely on any relevant statement as long as the opportunity for cross-examination is afforded to all parties through their Advisors, and may draw reasonable inferences from any decision by any party or witness not to participate or respond to questions.

If a party's Advisor of choice refuses to comply with the College's established rules of decorum for the hearing, the College may require the party to use a different Advisor. If a College-provided Advisor refuses to comply with the rules of decorum, the College may provide that party with a different Advisor to conduct cross-examination on behalf of that party.

32. Recording Hearings

Hearings (but not deliberations) are recorded by the College for purposes of review in the event of an appeal. The parties may not record the proceedings and no other unauthorized recordings are permitted.

The Decision-maker, the parties, their Advisors, and appropriate administrators of the College will be permitted to listen to the recording in a controlled environment determined by the Title IX Coordinator. No person will be given or be allowed to make a copy of the recording without permission of the Title IX Coordinator.

33. Deliberation, Decision-making, and Standard of Proof

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The Decision-maker will deliberate in closed session to determine whether the Respondent is responsible or not responsible for the policy violation(s) in question. The preponderance of the evidence standard of proof is used in all grievance proceedings. The hearing facilitator may be invited to attend the deliberation by the Decision-maker, but is there only to facilitate procedurally, not to address the substance of the allegations.

When there is a finding of responsibility on one or more of the allegations, the Decision-maker may then consider the previously submitted party impact statements in determining appropriate sanction(s). The Decision-maker will ensure that each of the parties has an opportunity to review any impact statement submitted by the other party(ies). The Decision-maker may – at their discretion – consider the statements, in formulating sanctions (if any) but the Decision-maker is not required to do so. The Decision-maker will review the statements and any pertinent conduct history provided by the Dean of Students or the Title IX Coordinator and will determine the appropriate sanction(s) in consultation with other appropriate administrators, as required.

The Decision-maker will then prepare a written determination of responsibility and deliver it to the Title IX Coordinator, detailing the determination, rationale, the evidence used in support of its determination, the evidence not relied upon in its determination, credibility assessments, and any sanctions.

This report is typically three (3) to five (5) pages in length and must be submitted to the Title IX Coordinator within two (2) business days of the end of deliberations, unless the Title IX Coordinator grants an extension. If an extension is granted, the Title IX Coordinator will notify the parties.

34. Notice of Outcome

Using the determination of responsibility, the Title IX Coordinator will work with the Decision-maker to prepare a Notice of Outcome. The Notice of Outcome may be reviewed by legal counsel. The Title IX Coordinator will then share the Notice of Outcome, including the determination of responsibility, rationale, and any applicable sanction(s) with the parties and their Advisors within 5 business days of receiving the Decision-maker's determination of responsibility.

The Notice of Outcome will then be shared with the parties simultaneously. Notification will be made in writing and may be delivered by one or more of the following methods: in person, placed in the student's campus mailbox, and/or emailed to the parties' College-issued email or otherwise approved account. Once mailed, emailed, and/or received in-person, notice will be presumptively delivered.

The Notice of Outcome will articulate the specific policy(ies) reported to have been violated, including the relevant policy section, and will contain a description of the procedural steps taken by the College from the receipt of the misconduct report to the determination, including any and all notifications to the parties, interviews with parties and witnesses, site visits, methods used to obtain evidence, and hearings held.

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The Notice of Outcome will specify the finding on each alleged policy violation; the findings of fact that support the determination; conclusions regarding the application of the relevant policy to the facts at issue; a statement of, and rationale for, the result of each allegation to the extent the College is permitted to share such information under state or federal law; any sanctions issued which the College is permitted to share according to state or federal law; and any remedies provided to the Complainant designed to ensure access to the College's educational or employment program or activity, to the extent the College is permitted to share such information under state or federal law (this detail is not typically shared with the Respondent unless the remedy directly relates to the Respondent).

The Notice of Outcome will also include information on when the results are considered by the College to be final, any changes that occur prior to finalization, and the relevant procedures and bases for any available appeal options.

35. Statement of the Rights of the Parties (see Appendix 2)

36. Sanctions

Factors considered when determining a sanction/responsive action may include, but are not limited to:

- 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 sexual harassment and/or retaliation
- The need for sanctions/responsive actions to prevent the future recurrence of sexual harassment and/or retaliation
- The need to remedy the effects of the sexual harassment and/or retaliation on the Complainant and the community
- The impact on the parties
- Any other information deemed relevant by the Decision-maker

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.

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.

a. Student Sanctions

The following are the sanctions that may be imposed upon students 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.

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- Required Counseling: A mandate to meet with and engage in either College-sponsored or external counseling to better comprehend the misconduct and its effects.
- Probation: A written reprimand for violation of institutional policy, providing for more severe disciplinary sanctions in the event that the student or organization is found in violation of any institutional policy, procedure, or directive within a specified period of time. Terms of the probation will be articulated and may include denial of specified social privileges, exclusion from co-curricular activities, exclusion from designated areas of campus, no-contact orders, and/or other measures deemed appropriate.
- Suspension: Termination of student status for a definite period of time not to exceed two years and/or until specific criteria are met. Students who return from suspension are automatically placed on probation through the remainder of their tenure as a student at the College. Conduct suspension will be added as a transcript notation on the student's transcript, which signifies suspension based on disciplinary matters.
- Expulsion: Permanent termination of student status and revocation of rights to be on campus for any reason or to attend College-sponsored events. This sanction will be noted permanently as a Social Expulsion on the student's official transcript.
- 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 an alleged violation.
- 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.
- Organizational Sanctions: Deactivation, loss of recognition, loss of some or all privileges (including class registration) for a specified period of time.
- Other Actions: In addition to or in place of the above sanctions, the College may assign any other sanctions as deemed appropriate.

b. Employee Sanctions/Responsive Actions

Responsive actions for an employee who has engaged in harassment and/or retaliation may include:

- Warning – Verbal or Written
- Performance Improvement Plan/Management Process
- Enhanced supervision, observation, or review
- Required Counseling
- Required Training or Education
- Probation
- Denial of Pay Increase
- Loss of Oversight or Supervisory Responsibility
- Demotion
- Reassignment
- Assignment to new supervisor
- Suspension with pay
- Suspension without pay

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- 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.

37. Withdrawal or Resignation While Charges Pending

a. Students: Should a student decide to not participate in the grievance process, the process proceeds absent their participation to a reasonable resolution. Should a student Respondent permanently withdraw from the College, the grievance process ends, as the College no longer has disciplinary jurisdiction over the withdrawn student.

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 sexual harassment and/or retaliation. The student who withdraws or leaves while the process is pending may not return to the College. Admissions and the Registrar's office will be notified that they cannot be readmitted. They may also be barred from College property and/or events.

If the student Respondent withdraws or takes a leave for a specified period of time (e.g., one semester), the grievance process may continue remotely and that student is not permitted to return to the College unless and until all sanctions have been satisfied.

b. Employees: Should an employee Respondent resign with unresolved allegations pending, the grievance process ends, as the College no longer has disciplinary jurisdiction over the resigned employee.

However, the College will continue to address and remedy any systemic issues or concerns that contributed to the alleged violation(s), and any ongoing effects of the alleged harassment or retaliation.

The employee who resigns with unresolved allegations pending is not eligible for rehire with the College. The employee's personnel file and the records retained by the Title IX Coordinator will reflect that status.

All College responses to future inquiries regarding employment references for that individual will include that the former employee resigned during a pending disciplinary matter.

38. Appeals Any party may file a request for appeal ("Request for Appeal"), but it must be submitted in writing to the Title IX Coordinator within 7 business days of the delivery of the Notice of Outcome and/or dismissal of a complaint. A single Appeal Decision-maker will Decision-maker the appeal. The Appeal Decision-maker will not have been involved in the process previously, including any dismissal appeal that may have been heard earlier in the process.

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 review is not a review of the merits of the appeal, but solely a determination as to whether the request

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meets the grounds and is timely filed. a. Grounds for Appeal Appeals are limited to the following grounds:

(A) Procedural irregularity that affected the outcome of the matter;

(B) New evidence that was not reasonably available at the time the determination regarding responsibility or dismissal was made, that could affect the outcome of the matter; and

(C) The Title IX Coordinator, Investigators, or Decision-maker had a conflict of interest or bias for or against Complainants or Respondents generally or the specific Complainant or Respondent that affected the outcome of the matter. If any of the grounds in the Request for Appeal do not meet the grounds in this Policy, that request will be denied by the Appeal Decision-maker and the parties and their Advisors will be notified in writing of the denial and the rationale.

If any of the grounds in the Request for Appeal meet the grounds in this Policy, then the Appeal Decision-maker will notify the other party(ies) and their Advisors, the Title IX Coordinator, and, when appropriate, the Investigators and/or the original Decision-maker.

The other party(ies) and their Advisors, the Title IX Coordinator, and, when appropriate, the Investigators and/or the original Decision-maker will be mailed, emailed, and/or provided a hard copy of the request with the approved grounds and then be given 7 business days to submit a response to the portion of the appeal that was approved and involves them. All responses will be forwarded by the Appeal Decision-Maker to all parties for review and comment.

The non-appealing party (if any) may also choose to raise a new ground for appeal at this time. If so, that will be reviewed to determine if it meets the grounds in this Policy by the Appeal Decision maker and either denied or approved. If approved, it will be forwarded to the party who initially requested an appeal, the Investigators and/or original Decision-maker, as necessary, who will submit their responses in 7 business days, which will be circulated for review and comment by all parties.

Neither 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 grounds and the subsequent responses will be shared with the Appeal Decision-maker, and the Decision-maker will render a decision in no more than 7 business days, barring exigent circumstances. All decisions apply the preponderance of the evidence standard. A Notice of Appeal Outcome will be sent to all parties simultaneously including the decision on each approved ground and rationale for each decision. The Notice of Appeal Outcome will specify the finding on each ground for appeal, any specific instructions for remand or reconsideration, any sanctions that may result which the College is permitted to share according to state or federal law, and the rationale supporting the essential findings to the extent the College is permitted to share under state or federal law.

Notification will be made in writing and may be delivered by one or more of the following methods: in person, placed in the student's campus mailbox, and/or emailed to the parties'

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College-issued email or otherwise approved account. Once mailed, emailed and/or received in person, notice will be presumptively delivered.

b. Sanctions Status during the Appeal Any sanctions imposed as a result of the hearing are stayed during the appeal process. Supportive measures may be reinstated, subject to the same supportive measure procedures above. If any of the sanctions are to be implemented immediately post-hearing, but pre-appeal, then emergency removal procedures (detailed above) for a hearing on the justification for doing so must be permitted within 48 hours of implementation. The College may still place holds on official transcripts, diplomas, graduations, and course registration pending the outcome of an appeal when the original sanctions included separation.

c. Appeal Considerations

- Decisions on appeal are to be deferential to the original decision, 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.
- Appeals are not intended to provide for a full re-hearing (de novo) of the allegation(s). In most cases, appeals are confined to a review of the written documentation or record of the original hearing and pertinent documentation regarding the specific grounds for appeal.
- An appeal is not an opportunity for Appeal Decision-maker 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 Title IX Coordinator on questions of procedure or rationale, for clarification, if needed. Documentation of all such consultation will be maintained.
- Appeals granted based on new evidence should normally be remanded to the original Investigators and/or Decision-maker for reconsideration. Other appeals may be remanded at the discretion of the Title IX Coordinator or, in limited circumstances, decided on appeal.
- Once an appeal is decided, the outcome is final: further appeals are not permitted, even if a decision or sanction is changed on remand (except in the case of a new hearing). When an appeal results in a new finding or sanction, that finding or sanction can be appealed one final time on the grounds listed above and in accordance with these procedures.
- In rare cases where a procedural or substantive error cannot be cured by the original Decision maker (as in cases of bias), the appeal may order a new hearing with a new Decision-maker.
- The results of a remand to a Decision-maker cannot be appealed. The results of a new hearing can be appealed, once, on any of the three available appeal grounds.
- In cases in which the appeal results in reinstatement to the College or resumption of privileges, all reasonable attempts will be made to restore the Respondent to their prior status, recognizing that some opportunities lost may be irreparable in the short term.

39. Long-Term Remedies/Other Actions Following the conclusion of the grievance process, and in addition to any sanctions implemented, the Title IX Coordinator may implement

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additional long-term remedies or actions with respect to the parties and/or the campus community that are intended to stop the sexual harassment and/or retaliation, remedy the effects, and prevent reoccurrence.

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

- Referral to counseling and health services
- Referral to the Employee Assistance Program
- 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 accommodations
- Implementation of long-term contact limitations between the parties
- Implementation of adjustments to academic deadlines, course schedules, etc.

At the discretion of the Title IX Coordinator, certain long-term support or measures may also be provided to the parties even if no policy violation is found. When no policy violation is found, the Title IX Coordinator will address any remedies owed by the College to the Respondent to ensure no effective denial of educational access. The College will maintain the privacy of any long-term remedies/actions/measures, provided privacy does not impair the College's ability to provide these services.

40. Failure to Comply with Sanctions and/or Interim and Long-term Remedies and/or Responsive Actions

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

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 from the College, and may be noted on a student's official transcript.

A suspension will only be lifted when compliance is achieved to the satisfaction of the Title IX Coordinator.

41. Recordkeeping

The College will maintain for a period of seven years records of:

1. Each sexual harassment investigation including any determination regarding responsibility and any audio or audiovisual recording or transcript required under federal regulation;
2. Any disciplinary sanctions imposed on the Respondent;

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3. Any remedies provided to the Complainant designed to restore or preserve equal access to the College's education program or activity;
4. Any appeal and the result therefrom;
5. Any Informal Resolution and the result therefrom;
6. All materials used to train Title IX Coordinators, Investigators, Decision-makers, and any person who facilitates an Informal Resolution process. The College will make these training materials publicly available on the College's website; and
7. Any actions, including any supportive measures, taken in response to a report or formal complaint of sexual harassment, including:
 - a. The basis for all conclusions that the response was not deliberately indifferent;
 - b. Any measures designed to restore or preserve equal access to the College's education program or activity; and
 - c. If no supportive measures were provided to the Complainant, document the reasons why such a response was not clearly unreasonable in light of the known circumstances.

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

42. Disabilities Accommodations in the Grievance Process

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 grievance process.

Anyone needing such accommodations or support should contact the Accommodations Office or the Human Resources Office, who will review the request and, in consultation with the person requesting the accommodation and the Title IX Coordinator, determine which accommodations are appropriate and necessary for full participation in the process.

43. Revision of this Policy and Procedures This Policy and procedures supersede any previous policy (ies) addressing harassment, sexual misconduct and/or retaliation under Title IX and will be reviewed and updated annually by the Title IX Coordinator. The College reserves the right to make changes to this document as necessary, and once those changes are posted online, they are in effect.

During the grievance process, the Title IX Coordinator may make minor modifications to procedures that do not materially jeopardize the fairness owed to any party, such as to accommodate summer schedules. The Title IX Coordinator may also vary procedures materially with notice (on the institutional website, with the appropriate effective date identified) upon determining that changes to law or regulation require policy or procedural alterations not reflected in this Policy and procedures.

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 regulations or holdings.

This document does not create legally enforceable protections beyond the protection of the background state and federal laws which frame such policies and codes, generally. These procedures are effective August 14, 2020.

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Publicly Available Recordkeeping:

The College will complete any publicly available recordkeeping, including Clery Act reporting and disclosures, without the inclusion of personally identifiable information about victims of dating violence, domestic violence, sexual assault, and stalking who make reports of such to the College to the extent permitted by law.

Victims to Receive Written Notification of Rights:

When a student or employee reports to the College that he or she has been a victim of dating violence, domestic violence, sexual assault, or stalking, whether the offense occurred on or off campus, the College will provide the student or employee a written explanation of his or her rights and options as described in the paragraphs above.

Sex Offender Registration Program:

The Campus Sex Crimes Prevention Act of 2000 requires institutions of higher education to advise members of the campus community where they can obtain information provided by the state concerning registered sex offenders. It also requires sex offenders to notify the state of each institution of higher education in the state at which they are employed or enrolled or carrying on a vocation. The state is then required to notify the College of any such information it receives. Anyone interested in determining whether such persons are on this campus may do so by contacting the Title IX Coordinator at 715-682-1484. State registry of sex offender information may be accessed at the following link: <https://appsdoc.wi.gov/public>

Timely Warnings and Emergency Response

Timely Warnings

In the event of criminal activity occurring either on campus or off campus that in the judgment of the Emergency Response Team, Title IX Coordinator, Dean of Students, Campus Safety, and/or Executive Director of Institutional Risk Management constitutes a serious or continuing threat to members of the campus community, a campus-wide “timely warning” will be issued. Examples of such situations may include a sexual assault or a series of motor vehicle thefts in the area that merit a warning because they present a continuing threat to the campus community. Warnings will be communicated to students and employees via one or more of the methods discussed later in this section. Updates to the warnings will be

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provided as appropriate.

Anyone with information warranting a timely warning should immediately report the circumstances to:

- Campus Safety, 715-682-1399

The College has communicated with local law enforcement asking them to notify the College if it receives reports or information warranting a timely warning.

Emergency Response

The College has an emergency management plan designed to ensure there is a timely and effective response in the event of a significant emergency or dangerous situation occurring on campus involving an immediate threat to the health or safety of members of the campus community. Such situations include, but are not limited to:

- Pandemic or other contagious disease outbreak
- Severe Weather Warning
- Natural Disaster
- Civil Disorder
- Structure or Wildland Fire
- Dangerous or Serious Crime in Progress or Other Police Emergency
- Active Shooter
- Suspicious Person Alert
- Bomb Threat
- Power Outage
- Chemical/Nuclear/Biological Spill or Other Hazardous Materials Incident
- Airplane Crash

The College has strong relationships with local health authorities in consideration of community health concerns of a pandemic or contagious disease outbreak. The College has communicated with local police requesting their cooperation in informing the College about situations reported to them that may warrant an emergency response.

Students, staff and visitors are encouraged to notify the Campus Safety Office at 715-682-1399 or 715-209-6971 of any emergency or potentially dangerous situation.

The Office of Campus Safety is a primary resource in confirming that an actual emergency or dangerous situation exists.

The Emergency Response Team is comprised of a cross functional team of Northland leaders. The purpose of this team is to confirm and respond to emergency situations. This team uses an automated phone application that allows the team to come together at a moment's notice to confirm that an emergency exists and then to enact the emergency response plan measures for that particular event.

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Once the emergency is confirmed and based on its nature, the Emergency Response Team, the Title IX Coordinator and/or the Executive Director of Institutional Risk Management will determine the appropriate segment or segments of the College community to receive the emergency notification and any follow-up communications. Marketing Communications will be called upon to assist in the delivery of the message.

The College will, without delay, and taking into account the safety of the community, determine the content of the notification, initiate the notification system, and disseminate a campus-wide notice, unless issuing a notification will, in the professional judgement of the responding authorities, compromise efforts to assist a victim or to contain, respond to, or otherwise mitigate the emergency.

All messages should include the type of situation, the location of the situation, the time and date, instructions for the recipient and an additional method for the public to obtain information. The following individuals will routinely be involved in making these determinations/decisions:

- Campus Safety
- Chief of Staff
- Dean of Students
- Dean of Academic Affairs
- Executive Director of Human Resources and Institutional Risk Management
- Executive Director of Information Technology & Infrastructure
- Title IX Coordinator

The Executive Director of Human Resources and Institutional Risk Management will direct the issuance of emergency notifications, which will be accomplished using one or more of methods discussed later in this section, depending on the nature of the threat and the segment of the campus community being threatened.

In addition to the notification of the on-campus community, the College will also report any significant emergency or dangerous situation to the local community. The initial and all follow-up reports will be executed by the Office of the President. All communications to local and regional media will be managed by the Marketing Communications office on behalf of the President. This will ensure Northland College sends consistent information to those off campus.

Methods for Issuing Timely Warnings and Emergency Notifications

The method(s) listed below may be utilized when the College issues a timely warning or emergency notification to the campus community.

Method	Sign-Up Instructions
Email	All College students and employees are assigned a College email address

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Method	Sign-Up Instructions
Emergency Alert Notification System (E2Campus)	More details can be found at https://my.northland.edu/campus-life/safe-campus/#emergency- and you can sign up for this service at https://northland.omnilert.net/subscriber.php

Testing & Documentation

Northland College Emergency Alert Notification System equipment is tested at least once per calendar year to ensure it is working properly. At least once annually the College will conduct a full activation of the Emergency Alert Notification System which will be advertised to Northland College. The Northland College emergency response plan is typically activated at least once per year depending on the nature of events on campus. If the response plan is not activated by an actual event in a calendar year, the plan will be tested as a table top or field exercise.

The Executive Director of Information Technology & Infrastructure maintains a record of these tests and training exercises, including a description of them, the dates and times they were held and an indication of whether they were announced or unannounced. In connection with at least one such test, the College will distribute to its students and employees information to remind them of the College's emergency response and evacuation procedures.

Missing Student Policy

Northland College takes student safety very seriously. The Higher Education Act requires that all institutions that provide on-campus student housing must establish a missing student notification policy and procedure. This policy establishes the procedures for the College's response to reports of missing students.

This policy applies to students who reside in campus housing in all residential living spaces. For purposes of this policy, a student may be considered to be a "missing person" if the person's absence is contrary to their usual pattern of behavior and without having informed roommates, friends, or residential life staff of the change.

At the beginning of each academic year, students submit emergency contact information to the institution. Each residential student will also be asked to voluntarily provide contact information, of a person, hereby referred to as the designated contact, to notify in the event they are reported missing while enrolled at Northland, the start of the year. The designated contact is in addition to the general emergency contact person, but they can be the same individual for both purposes. Designated contact information will be kept in the Residential Life office and will be updated annually.

- Students age 18 and older and emancipated minors will have the opportunity to designate an individual or individuals to be contacted by the College *solely* for missing student purposes. This contact person can be, but does not have to be, the same person listed as an emergency contact.

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- Students under the age of 18, who are not emancipated, will have their parent or custodial guardian notified as required by the law. They can still list a designated contact person who will also be notified.

General Procedure for a Missing Person

Any individual who has information that a residential student may be a missing person must notify Campus Safety 715-682-1399 or 715-209-6971 as soon as possible.

1. Campus Safety will collect and document the following information at the time of the report from the reporting person and from any known student's acquaintances:
 - The name and relationship of the person making the report
 - The date, time, and location the missing student was last seen
 - A physical description of the student including clothes last worn
 - The general routine or habits of the suspected missing student including any recent changes in behavior or demeanor
 - Any contact information for the missing student
2. Every report made to Campus Safety will be followed up with an immediate investigation once a student has been reported missing.
 - If a residential student has not been seen for more than 24 hours, Campus Safety will contact the Dean of Students and the Director of Residential Life in order to update them on the situation and receive any additional consultation. The Dean of Students will ascertain when/if campus leadership needs to be contacted or if the Emergency Response Team needs to meet.
 - No later than 24 hours after determining that a residential student is missing, the Dean of Students will notify the following that a student is presumed missing
 1. the designated contact individual(s) (for students 18 and over and emancipated minors)
 2. the parent(s) or custodial guardian(s) and the designated contact individual(s) (for students under the age of 18 who are not emancipated)

Upon notification that a student may be missing, Northland may use any or all of the following resources to assist in locating the student:

- Call the student's cell phone number
- Go to the student's room and perform a welfare check
- Secure a current student ID picture
- Talk to the student's roommate, friends, hall mates, RA and HRA to see if anyone can confirm the missing student's whereabouts and/or confirm the date, time, and location the student was last seen

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Crime	On Campus			On Campus Housing			Non Campus			Public Property		
	2019	2018	2017	2019	2018	2017	2019	2018	2017	2019	2018	2017
Arrest - Weapon Violation	0	0	0	0	0	0	0	0	0	0	0	0
Disciplinary Referral - Liquor Law Violation	80	80	115	79	77	115	0	0	0	0	0	0
Disciplinary Referral - Drug Abuse Violation	17	25	38	12	25	38	0	0	0	0	0	0
Disciplinary Referral - Weapon Violation	0	1	1	0	1	1	0	0	0	0	0	0
Domestic Violence	0	2	0	0	1	0	0	1	0	1	0	0
Dating Violence	1	0	0	1	0	0	0	2	0	0	0	0
Stalking	0	0	0	0	0	0	0	0	0	0	0	0

Hate crimes:

2019: 1 On Campus Housing incident of Fondling characterized by gender bias.

2018: No hate crimes reported.

2017: No hate crimes reported.

Crimes unfounded by the College:

2019: 0 unfounded crimes.

2018: 0 unfounded crimes.

2017: 0 unfounded crimes.

Statistics for unfounded crimes provided by law enforcement agencies:

2019: 0 unfounded crimes.

2018: 0 unfounded crimes.

2017: 0 unfounded crimes.

Data from law enforcement agencies:

- The data above reflects statistics provided from law enforcement agencies related to crimes that occurred on the College's Clery Geography.

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Annual Fire Safety Report

Housing Facilities and Fire Safety Systems

The College maintains on-campus housing for its students. Below is a description of fire safety systems and the number of fire drills conducted during the previous calendar year.

Campus: Northland College, 1411 Ellis Avenue, Ashland, WI 54806-3999

Facility	Fire Alarm Monitoring Done on Site	Partial Sprinkler System	Full Sprinkler System	Smoke Detection	Fire Extinguishers	Evacuation Plans & Placards	Number of evacuation (fire) drills in previous calendar year
Fenenga Hall, 1411 Ellis Ave	X			X	X	X	3.0
Gaia's Cradle, 1208 2nd Ave West				X	X	X	0.0
McLean MELLC, 1411 Ellis Ave	X		X	X	X	X	2.0
McMillan Hall, 1411 Ellis Ave	X			X	X	X	2.0
Mead Hall, 1411 Ellis Ave	X			X	X	X	2.0
Memorial Hall, 1411 Ellis Ave	X			X	X	X	2.0
Townhouses, 1411 Ellis Ave				X	X	X	0.0

Policies on Portable Appliances, Smoking and Open Flames

Candles, Oil Lamps & Incense

All candles, oil lamps, incense or other items that produce an open flame (whether lit or unlit) are not permitted in any residential housing building including townhouses, apartments and

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Gaia's Cradle. Candle warming devices are allowed if they come equipped with an automatic on-off switch. If a student wishes, incense will be provided for meditation/religious use in the Spiritual Life Center on the fourth floor of Wheeler Hall.

Electrical Appliance Information

Cooking in the residence hall rooms is discouraged, as the residence hall rooms are not designed for this purpose. Popcorn poppers, hot pots and similar devices (i.e., with no open burner/coil and limited wattage) are acceptable. Devices such as hot plates, Fry Daddy's, electric frying pans, fondue pots, or other similar appliances which require grease and/or open flame for cooking are not permitted. Microwave ovens are provided in each residence hall kitchen, and those that require 800 watts or less are allowed in the residence hall rooms. Any appliance used in the residence halls must be UL listed and be in good condition with no broken parts or damaged cords. If you are unsure about an appliance that you have, contact the Office of Residential Life for clarification. Only compact refrigerators are permitted in the residence hall rooms.

Electrical clocks, radios, stereos, televisions, blankets, razors, microwaves, George Foreman grills, personal computers, and small refrigerators may be used in resident rooms. The only cooking appliances permitted are coffee makers, microwaves, and appliances with self-contained heating units. Each hall provides kitchens for extensive cooking. Possessing or using hazardous electrical appliances such as those with exposed heating elements is not permitted in residence hall rooms.

We recommend the use of surge protectors for all electrical equipment. Residents may not alter the electrical systems or equipment in their rooms/apartments/townhouse. Residents of the MELLC apartments, townhouses and Gaia's Cradle should speak with the Office of Residential Life to request to use any special appliances in their unit.

Fire Hazards

The following are considered fire hazards and may not be stored or used in residence halls or housing units:

1. Any type of fuel (camp stove, gas, kerosene)
2. Any machine/equipment which requires the above to operate
3. Homemade lofts or decks
4. Anything blocking windows or doorways (i.e., tapestry hung in doorway, bicycle hung in front of window, etc.)
5. Bicycles, etc., in hallways and lounges
6. Halogen/torch style lamps. Due to the high level of danger associated with this style of light as well as the extreme energy inefficiency of halogen lamps, Northland College does not allow this type of fixture in residence hall rooms. Any student found in possession of this style of lamp will be required to remove the lamp.
7. Cut trees or bushes (i.e., Christmas trees)
8. Hallways and stairwells must remain clear of resident items to allow for a safe fire exit. Items stored inappropriately will be removed without the owner's consent.

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9. Incense, candles, oil lamps, and other open-flame objects are not permitted in residence hall rooms, housing units or living areas
10. Anything that can be reasonably determined to be a hazard by the Director of Residential Life

Flammable Liquids, Chemicals, Open Flame, Fire Hazards

The possession and use of any harmful chemicals, flammable liquids/lighter fluid, firecrackers, and/or other explosives in the residence halls or immediate vicinity is prohibited.

Health and Safety Inspections

The Office of Residential Life and Campus Safety conduct safety inspections of every residence hall room each semester. In addition, Campus Safety and the Facilities/Maintenance Office conduct safety inspections of all facilities along with a member of the Ashland Fire Department. The inspections include a visual examination of electrical cords, sprinkler heads, and smoke detectors. In addition, each room is inspected for the presence of prohibited items such as candles, halogen lamps, open coiled appliances, pets, etc. Rooms are also inspected for prohibited activities such as smoking in the rooms, removal of door closers, unauthorized door locks, removal of exterior window screens, and tampering with emergency equipment. The inspections also include a general assessment of cleanliness of the room, including food and waste storage. Residents are notified prior to inspection when the date and time of inspection will occur. Notice of health and safety checks are posted in the common areas and/or via email to your Northland account 48 hours before they are to be initiated in a building. Also, rooms are typically checked during interim periods when the residence halls are closed. Residents will be held accountable if other policy violations are noticed during these health and safety inspections. All areas of your room will be checked. Conditions warranting follow up are turned over to the Office of Residential Life.

Fire Evacuation Procedures

If a fire is detected or a fire alarm sounds, evacuate the area. Every room on campus is provided with a map highlighting evacuation routes for your location. Please review and proceed. Isolate the fire by closing doors as you leave. Do not attempt to extinguish fire yourself.

The campus fire alarm systems alert community members of potential hazards. Community members are required to heed an activated alarm system, and evacuate a building immediately. Use the nearest available exit to evacuate the building. Gather outside at the designated area notated in the emergency posting for all facilities. Community members should familiarize themselves with the exits in each building.

When a fire alarm is activated the elevators in our buildings will be recalled to a "safe floor" and will not activate after the alarm is sounded. Occupants should use the stairs to evacuate the building.

Fire Education and Training Programs

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All first-year students receive fire safety training when they arrive at Northland College at the beginning of the academic school year through the Residence Life staff. All residential staff receive annual fire safety training at the beginning of the academic year. Campus Safety serves as an additional resource for educating the entire campus community.

Emergency Evacuation Drills

The supervised scheduled drills at campus residence halls are facilitated by the Office of Residential Life in cooperation with assigned college personnel and Campus Safety. Various drills are conducted throughout the year to familiarize students, faculty and staff with the Emergency Procedures and individual roles. Each residence hall, the townhouses, and the college-owned student housing has two fire evacuation drills each year.

Fire Alarms

When an alarm is sounded, it should be treated as an emergency. **It is in violation of campus policy for any person to not respond to a fire alarm.**

During an alarm:

1. *Put on shoes/coat*
2. *Close window and open curtains*
3. *Touch door to see if it is hot, if so, stay in room and try to attract attention through window*
4. *If door is not hot, turn off lights and other electrical appliances*
5. *Close your door, but leave it unlocked*
6. *Exit building*
7. ***Remain outside until HRA, RA, Campus Safety or fire department give the all clear***

Fire Drills

Each term, the Campus Safety staff will conduct fire drills to help you prepare yourself for a potential fire alarm/fire. Residents are expected to abide by the directions of the staff during fire drills and fire alarms

Fire Equipment

It is illegal to tamper, in any way, with firefighting equipment (extinguishers and hoses, emergency lights, exit signs, or smoke detectors). To do so unnecessarily endangers others in the event of a crisis. All violators of this policy will be prosecuted in accordance with the law. Students who reside in an area in which a smoke detector is disconnected, turned off or tampered with, causing the device to malfunction, will be referred for disciplinary action and charged for repair/replacement of the device. Each smoke detector is equipped with a battery backup. In the event that a battery charge is low, a beep will be heard. Please notify an RA or HRA immediately to facilitate the changing of the battery.

Reporting Fires

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The College is required to disclose each year statistical data on all fires that occurred in on-campus student housing. When a fire alarm is pulled and/or the fire department responds to a fire, these incidents are captured. If you encounter a fire that presents an emergency situation, ensure your own safety and then please call 911.

There may also be instances when a fire is extinguished quickly and an alarm is not pulled or a response by the fire department was not necessary. It is important that these incidents be recorded as well. Therefore, if you are aware of such a fire, see evidence of one or hear about one, you should contact the Office of Campus Safety at 715-682-1399. When providing notification of a fire, give as much information as possible about the location, date, time and cause of the fire.

Plans for Future Improvements

The College periodically reviews its fire safety protections and procedures. At this time, it has no plans for future improvements.

Fire Statistics

Northland College

2019

No fires were reported in 2019.

2018

No fires were reported in 2018.

2017

No fires were reported in 2017.