



TO: STATE OF CONNECTICUT

FROM: HARTFORD SEMINARY

DATE: September 22, 2021

RE: PA 14-11 REPORTS FOR January 1, 2020 – December 31, 2020

Pursuant to General Statutes Section 10a-55m, Section 2(f), Hartford Seminary submits the following information pertaining to the time period of January 1, 2020 – December 31, 2020.

1. Hartford Seminary's Policies Regarding Sexual Assault, Stalking, and Intimate Partner Violence

Attached please find a copy of Hartford Seminary's definitions and policies regarding sexual harassment, assault, stalking, and intimate partner violence.

2. Hartford Seminary's Concise Written Notification of a Victim's Rights and Options

Attached please find a copy of a portion of Hartford Seminary's comprehensive Campus Safety, Security, and Fire Report for 2020 which also details out a student's rights and options if reporting incidents of sexual violence, relationship violence, and stalking. Handouts and resources from the website are distributed to all incoming students and employees at student orientation.

3. Hartford Seminary's Sexual Assault, Stalking, and Intimate Partner Violence Prevention, Awareness, and Risk Reduction Programs

Attached please find a copy of a portion of Hartford Seminary's website on Title IX which details out resources and statistics on sexual assault, stalking, and intimate partner violence. Hartford Seminary does one annual prevention, awareness, and risk reduction program live at student orientation for all students, faculty, and staff. Attached is a print out of the Power Point Presentation. Hartford Seminary also partners with Safe Colleges to provide online training for staff, faculty, and students on Title IX, Sexual Harassment, and Active Shooter.

4. Hartford Seminary's Sexual Assault, Stalking, and Intimate Partner Violence Prevention and Awareness Campaigns

Attached please find a copy of a portion of Hartford Seminary's website on Title IX campaigns students, staff, and faculty are made aware of regarding sexual assault, stalking, and intimate partner violence. Posters are put up on student services bulletin boards on campus. All campus staff and faculty do not guarantee confidentiality and have signs on their doors to indicate if it is a safe space to report any Title IX violations.

5. Incidents of Sexual Assault, Stalking, and Intimate Partner Violence Reported to Hartford Seminary

None

6. Confidential or Anonymous Reports or Disclosures

None

7. The Number of Disciplinary Cases and the Final Outcomes of these Cases, including the outcome of any appeals, to the extent that reporting the outcomes does not conflict with federal law.

None

A handwritten signature in dark ink, appearing to read "Michael", followed by a long horizontal flourish.

Hartford Seminary

Annual Security and Fire Safety Report

2018, 2019 & 2020 Statistics
Issued Sept. 2021 for the Year 2020



Exploring Differences, Deepening Faith

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Submitted by:

Ann Crawford, Chief Operating Officer, Director of Administration & Facilities

Michael Sandner, Chief Business Officer, Title IX Officer

Introduction

Hartford Seminary prepares this report annually in compliance with the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act (Clery Act); the State of Connecticut Act Concerning Sexual Violence, Stalking, and Intimate Partner Violence on College Campuses; and An Act Concerning Gun Violence Prevention and Children's Safety. This report includes statistics for calendar years 2017, 2018 and 2019. These statistics pertain to crimes reported to have occurred upon the Seminary's campus and adjacent locations as required by the Clery Act. This report also provides statistics for fires reported in on-campus student housing facilities. In addition, the report includes institutional policies on campus security, such as policies concerning alcohol and drug use, crime prevention, and sexual assault reporting and investigation.

This report is available in full online at: <https://www.hartsem.edu/current-students/campus-safety/>

The Hartford Seminary campus is in the West End of Hartford on twelve acres of land, and includes four office buildings and fifteen residences. The Seminary endeavors to provide a safe, problem-free facility for and with the assistance of its students, staff, faculty, and visitors. Safety and security concerns are handled by the Director of Administration & Facilities. Issues related to Title IX are coordinated by the Chief Business Officer.

Law Enforcement

Hartford Seminary relies on the services of the Hartford Police Department for law enforcement. The Director of Administration & Facilities serves as the campus security official. While there is no official law enforcement authority designated to this position, the Director serves as the liaison to local, state, and federal law enforcement agencies and is the key contact for campus crimes, fires, and related safety issues.

Crime Reporting

Victims of or witnesses to criminal activity on campus should report the incident to the Hartford Police and to the Director of Administration & Facilities immediately. A Campus Crime Report Form, including police case number, must be completed on the day of the crime. Forms can be obtained from the Campus Safety page at <https://www.hartsem.edu/current-students/campus-safety/> or the Director of Administration & Facilities.



Information regarding victims' rights and services is available for victims by visiting the Office of the Victim Advocate at <http://www.ct.gov/ova/site/default.asp>.

Crime Prevention, Security Awareness & Risk Reduction

Confidential procedures detail proper safety and security measures for all Seminary offices and classrooms. These are distributed to employees; extra copies are on file in the Office of the Director of Administration & Facilities.

Students, staff, and faculty may enter the lobby of our main building at 77 Sherman Street during business and class hours using their electronic access cards. Visitors may use the intercom to request entry. At other times, the front door is locked and alarms are activated. Persons with physical disabilities and/or special needs may notify the Director of Administration & Facilities. Access to 80 Sherman Street, 76 Sherman Street, and 60 Lorraine Street is also provided via the access card. Keys to residential facilities are issued on an as-needed basis to residents.

Security cameras at the entrances to buildings and around parking lots and student housing provide intrusion monitoring and vulnerability scanning. Silent as well as audible/visual alarm systems are in place on campus.

All members of the Seminary community are advised to be alert to any unusual occurrences or suspicious persons and report them immediately. Personal belongings and valuables should not be left unattended. Cars should be locked and parked in well-lit areas with no valuables left in the car or trunk. A club locked on a steering wheel may deter thieves as well. Most importantly, students, staff, and faculty are encouraged to use good judgment when leaving any facility at night by walking in pairs. Students are encouraged to obtain apps for their phones that enhance personal safety.

Crime Logs

A log of all campus crimes and fires is maintained in the Director of Administration & Facilities' office and is available for inspection with 24 hours' notice.

Statistics

In compliance with the Federal Student Right-to-know and Campus Security Act, the following statistics are provided to reflect the crimes committed on the property of the Seminary and other locations as required for the most recent and two preceding years.

Offense	2018	2019	2020
Murder - Manslaughter	0	0	0
Murder - Negligent Manslaughter	0	0	0
Domestic Violence	0	0	0
Dating Violence	0	0	0
Stalking	0	0	0
Sex Offenses - Forcible	0	0	0
Sex Offenses - Non-forcible	0	0	0
Robbery	0	0	0
Larceny	2	1	0

Aggravated Assault	0	0	0
Burglary	1	0	0
Motor Vehicle Theft	0	0	1 - parts
Arson	0	0	0
Hate Crimes	2018	2019	2020
Race	0	0	0
Gender	0	0	0
Religion	0	0	0
Sexual Orientation	0	0	0
Ethnicity	0	0	0
National Origin	0	0	0
Disability	0	0	0
Arrests	2018	2019	2020
Liquor Law Violations	0	0	0
Drug Violations	0	0	0
Weapons Violations	0	0	0
Disciplinary Referrals	2018	2019	2020
Liquor Law Violations	0	0	0
Drug Violations	0	0	0
Weapons Violations	0	0	0

Statistics were collected from the Hartford Police Crime Statistics Department and listed according to the required categories. None of the above were determined to be hate crimes. A copy of the police log of other neighborhood crimes is available upon request.

NOTE: Several crimes occurred in the Farmington Avenue, Girard Avenue and Lorraine Street areas in 2020. While outside of the campus area required for reporting, Seminary students, staff, faculty, and visitors are advised to be aware of the surroundings and take precautions.

Campus Alerts, Timely Warnings & Emergency Notification

Hartford Seminary endeavors to provide a safe and healthy environment to its students and staff to compliment an excellent educational experience. In compliance with Federal mandates, we provide this policy to outline our emergency notification procedures in case of required timely warnings, significant campus emergencies, or other dangerous situations. Examples of immediate emergencies include extreme weather conditions including storms, hurricanes and tornados; gas leaks, earthquakes, armed intruders, bomb threats, terrorist incidents, explosions, fires, viruses, or other serious illnesses.

Students and staff are required to submit multiple methods of contacting them via land line and cell phone, text, e-mail, etc., to the Registrar.

In cases of extreme emergency or dangerous situations, Hartford Seminary will make every effort to notify the campus community. Students and staff who have submitted their cell phone number will be sent a text message alerting them to the situation if possible. Students and staff are also encouraged to enter their emergency contact information into the Populi system.

Once the Seminary receives notice of and confirms an immediate or ongoing threat to the health and safety of students and employees on campus, without delay, the President, Dean, Director of Administration & Facilities, and Registrar will determine and authorize notification to all staff and students on and off campus. If one or more of these administrators are not available, the others will make a decision as time is of the essence. The decision will take into account the possibility that the notification may compromise the efforts to assist victims or to contain and respond to the emergency before the decision is made. Those responsible for carrying out these actions are:

Joel Lohr, President
David Grafton, Academic Dean
Ann Crawford, Director of Administration & Facilities
Danielle LaVine, Registrar

Immediately upon approval, the Registrar will take the lead for sending out a mass notification to all students & staff via the Populi system. The Director of Administration & Facilities will coordinate alternate notifications to staff with the President and his support staff. Depending on the emergency, other methods of communication will include direct e-mail, Facebook postings, text messages, broadcast announcements via the phone system, phone trees, public media announcements, postings on buildings, etc.

Seminary Policies

Health, safety, and respect for individual differences are priorities for all on the Hartford Seminary campus. We adhere to the principles and laws of the State of Connecticut and the U.S. government, and all constituents are expected to comply. Our policies prohibit discrimination against any individual on the basis of race, sex, sexual orientation, gender identity, religious creed, color, age, national or ethnic origin, ancestry, marital status, present or past history of mental disorder, mental retardation, learning disability or physical disability including, but not limited to, blindness or veteran status, or any other reason prohibited by an applicable law or intolerance of any of the above mentioned classes. The cooperation and involvement of students, faculty, and staff is essential in order to maintain a safe, secure, and respectful campus.

Weapons Possession Policy

The possession, use or sale of weapons is prohibited on all areas of the Seminary campus. Weapons include, but are not limited to, firearms, ammunition, explosives, fireworks and hunting knives.

Illegal Drugs and Alcohol Abuse Policy

Hartford Seminary is committed to maintaining a drug-free workplace in accordance with the requirements of the Federal Drug-Free Workplace Act and the amended Drug-Free Schools and Communities legislation and wholeheartedly endorses national standards for prevention programs. Education assumes a healthy integrating of mind, body and spirit. Hartford Seminary joins with other institutions of higher education to eliminate substance abuse.

Hartford Seminary strictly prohibits the unlawful manufacture, possession, use, or distribution of illegal drugs and unauthorized alcohol by students and employees on its property or at any Seminary-sponsored activity, function, or event. Although the conditions of alcohol and drug dependency may be considered disabilities or handicaps under State and Federal law, all are considered to be responsible for their actions and their conduct.

Hartford Seminary does not have a medical clinic and does not employ medical professionals. Concerned individuals are referred to the Connecticut Clearinghouse of the Wheeler Clinic for additional resources on alcohol, tobacco, drugs, mental health and wellness: www.ctclearinghouse.org; (800) 232-4424.

Minimum sanctions to be imposed for violation of this policy normally include probation, suspension, or separation from the institution and referral for prosecution. The Seminary may require the completion of an appropriate rehabilitation program to be determined by the President on a case-by-case basis for various degrees of infractions. Hartford Seminary's disciplinary procedures respect the rights of students and employees under State and Federal law. A full list of sanctions and charges for the illicit possession, use or distribution of drugs and alcohol can be found in the Controlled Substance Charges and Schedules of the Department of Consumer Protection Drug Control Division at: <https://portal.ct.gov/DCP/Drug-Control-Division/Drug-Control/Controlled-Substance-Charges-and-Schedules>

Non-medical Emergencies and Evacuation Procedures

Hartford Seminary provides residential students a housing orientation at the beginning of each semester that includes emergency procedures and a fire-safety video. This is followed by a housing walk-through to point out locations of and proper use of fire extinguishers and safety ladders, as well as evacuation procedures in student housing. Emergency evacuation routes are posted on each floor of our four office buildings and our three-story student residences. The Seminary's Emergency Preparedness and Response Plan outlines emergency procedures, including key contacts, external resources, rallying locations, drills, and follow-up. Many of these documents are included in this security report and the manual is available for perusal in the office of the Director of Administration & Facilities.

Non-medical emergencies and campus crimes should be reported to the Director of Administration & Facilities immediately. After hours, the Resident Assistant can be reached via the emergency contact info posted in each student housing kitchen and in the housing handbook. They will assess the situation and notify the Director if necessary. If the RA cannot be reached, students may call the Director directly. The Hartford Police Department can be reached at (860) 527-6300, and the Fire Department at (860) 722-8200. A campus crime report form can be obtained from the Campus Safety page at

<https://www.hartsem.edu/current-students/campus-safety/> or the Director of Administration & Facilities.

If an emergency threatens life or property, and might require the response of medical, law enforcement, or fire-fighting professionals, dial 911 immediately. Students should keep in mind that this number is for extreme emergencies only and must be used with good judgment.

Missing Students Policy

Hartford Seminary currently has the capacity to house up to 30 residential students. A missing student is defined as any Hartford Seminary student who resides in a housing unit owned by Hartford Seminary and who is reported as missing from their room/housing unit for 24 hours. Therefore, it is important for residential students to notify their roommates and/or residential assistant if they are leaving their housing unit for more than 24 hours.

Each student has the right to identify an individual as an emergency contact that Hartford Seminary can contact no later than 24 hours after the time the student is determined to be missing. The emergency contact information should be submitted to the Registrar's office and the Director of Administration & Facilities upon registering for classes and signature of a housing lease.

If any member of the Hartford Seminary community has reason to believe that a residential student is missing, all possible efforts will be made to locate the student. A missing student must be reported to the Director of Administration & Facilities who will work with the Dean's office to notify contacts and authorities no later than 24 hours after the time the student was reported missing. The Seminary will cooperate and assist the authorities in all ways prescribed by law.

Sexual Harassment/Violence Policy

Hartford Seminary prohibits discrimination, including discriminatory harassment, sexual assault, dating violence, domestic violence, stalking, sexual or gender-based harassment, complicity in any act prohibited by this Policy, retaliating against anyone for reporting a violation of this Policy or for participating in any investigation or proceeding under this policy. These forms of prohibited conduct are unlawful and undermine the mission and values of the Hartford Seminary.

All Hartford Seminary employees are required to report sexual harassment to the Title IX coordinator. No paid Hartford Seminary employee can guarantee confidentiality.

Title IX of the Education Amendments of 1972 protects both the complainants from sexual harassment, discrimination, and violence based on sex, and the respondents – who are in the United States - accused of sexual harassment, discrimination, and violence in education programs and activities that receive federal financial assistance. Education program or activity includes locations, events, or circumstances over which the Seminary exercises substantial control over both the respondent and the context in which the sexual harassment occurred. Title IX applies to all of a school's education programs or activities, whether such programs or activities occur on-campus, off-campus, or virtually. Hartford Seminary may address sexual harassment affecting its students or employees that falls outside Title IX's jurisdiction in any manner the Seminary chooses, including providing supportive measures or pursuing discipline.

This policy does not limit principles of academic freedom or freedom of speech even when such speech or expression is offensive, nor does it abridge the Seminary's educational mission.

Our Title IX Officer monitors compliance with this law and ensures that complaints of this nature are appropriately and equitably addressed. Any person can report sex discrimination including sexual harassment (whether or not the person reporting is the alleged target of the conduct that could constitute sex discrimination or sexual harassment), in person, by mail, or by email, using the contact information below at any time. Questions, concerns, and reports of violations can be brought to:

Michael P. Sandner, Esq.
Chief Business Officer
Title IX Officer
77 Sherman Street
Office 302
Hartford, CT 06105

msandner@hartsem.edu
(860) 509-9525

Definition

Sexual Harassment is broadly defined as: (1) quid pro quo harassment by a school's employee; (2) any unwelcome conduct that a reasonable person would find so severe, pervasive, and objectively offensive that it denies a person equal educational access; and (3) any instance of sexual assault (as defined in the Clery Act), dating violence, domestic violence, or stalking as defined in the Violence Against Women Act (VAWA).

(In compliance with the US Department of Education Clery Act regulations and for clarification purposes, definitions of additional related sexual harassment/violence occurrences and terminology are listed in this document.)

Procedures for Handling Complaints of Sexual Harassment and Violence

Hartford Seminary utilizes the standard of evidence of "clear and convincing evidence" to determine responsibility. Hartford Seminary will apply this standard of evidence consistently for all formal complaints of sexual harassment whether the respondent is a student or an employee (including faculty members).

- Clear and convincing evidence is highly and substantially more likely to be true than untrue; the fact finder must be convinced that the contention is highly probable.

Both complainants and respondents of sexual harassment, sexual assault, stalking, dating violence or domestic violence will receive a written explanation of their rights and options of supportive measures and related services available to them whether or not law enforcement has

been notified. Fair, impartial, and formal hearings or informal proceedings – mediation or restorative justice - will occur as prescribed by Clery Act regulations.

Hartford Seminary will resolve all Title IX proceedings (investigations, formal hearings, informal resolutions, and appeals) in a reasonable prompt time frame with the allowance for short-term good cause delays or extensions.

A Sexual Harassment/Violence Task Force will be appointed by the President of Hartford Seminary within two (2) weeks of the beginning of each academic year to address any complaints of sexual harassment or violence, including stalking and dating/domestic violence that may arise. A list of the members of the task force will be distributed to all members of the Hartford Seminary community within the first three weeks of the new academic year.

- The Sexual Harassment/Violence Task Force shall be comprised of three appropriate parties – one member from the Board of Trustees, one member from the Faculty, and one member from the Staff. Each party would serve as the sole decision maker in a formal hearing or an informal resolution on a rotational basis. If either the complainant or respondent is a member of the task force, the party must recuse themselves and an alternate must be identified as a replacement.
- The Title IX Officer cannot serve on the Sexual Harassment/Violence Task Force.
- The Sexual Harassment/Violence Task Force must issue a written determination regarding responsibility with findings of fact, conclusions about whether the alleged conduct occurred, rationale for the result as to each allegation, any disciplinary sanctions imposed on the respondent, and whether remedies will be provided to the complainant. The written determination must be sent simultaneously to the parties along with information about how to file an appeal.

Training Requirements - All Title IX personnel must be free from conflicts of interest or bias for or against complainants or respondents. All Title IX personnel (officer, investigators, and decision-makers) must include training on the definition of sexual harassment, the scope of the school's education program or activity, how to conduct an investigation and grievance process including hearings, appeals, and informal resolution processes, as applicable, and how to serve impartially, including by avoiding prejudgment of the facts at issue, conflicts of interest, and bias. The Sexual Harassment/Violence Task Force will also receive training on any technology to be used at a live hearing. All Title IX personnel shall receive training on relevance, including how to apply the rape shield protections provided only for complainants. All Title IX personnel must have a presumption that the respondent is not responsible for the alleged conduct until a determination regarding responsibility is made at the conclusion of the grievance process. All materials used to train Title IX personnel are posted on the Seminary's website.

Reporting, Response, and Remedy Requirements

The first step in the procedure is the reporting of a complaint/allegation to the Title IX Officer or the Title IX Officer receiving information about an allegation that would result in an official obligation for the Seminary to respond to the alleged complainant and/or the alleged respondent.

- The complainant must be participating in or attempting to participate in the education program or activity of the school which the formal complaint is filed.
- The respondent must be in the United States.
- The Seminary must respond promptly to the Title IX sexual harassment allegation in a manner that is not deliberately indifferent, which means a response that is not clearly unreasonable in light of the known circumstances.
- The Title IX Officer must promptly contact the complainant confidentially to discuss the availability of supportive measures, consider the complainant's wishes with respect to supportive measures, inform the complainant of the availability of supportive measures with or without the filing of a formal complaint, and explain to the complainant the process for filing a formal complaint.
- The Title IX Officer will respect the complainant's wishes with respect to whether the Seminary investigates a sexual harassment complaint unless the Title IX Coordinator determines that signing a formal complaint to initiate an investigation over the wishes of the complainant is not clearly unreasonable in light of the known circumstances.
- Where the Title IX Officer signs a formal complaint, the Title IX Officer must not be the complainant or a party during the grievance process, and must comply with requirements for Title IX personnel to be free from conflict or bias.
- The Seminary must investigate sexual harassment allegations in any formal complaint, which can be filed by the complainant, or signed by the Title IX Officer.
- Title IX investigations may not be conducted by the Title IX Officer.
- Any provisions, rules, or practices that the Seminary adopts as part of its grievance process for handling formal complaints of sexual harassment must apply equally to both parties.
- The Seminary must follow a formal grievance process before the imposition of any disciplinary sanctions or other actions that are not supportive measures, against a respondent. The Seminary may remove any individual from campus immediately without a hearing when an individual's presence poses a safety threat to the campus community. In the event that an individual is removed under this exception, a disciplinary hearing will be held quickly while the removal order is still in effect.
- The Seminary must not restrict the rights protected under the US Constitution, including the First Amendment, Fifth Amendment, and Fourteenth Amendment, when complying with the Title IX. The Seminary must not use, rely on, or seek disclosure of information protected under a legally recognized privilege, unless the person holding the privilege has waived the privilege.
- If the allegations in a formal complaint do not meet the definition of sexual harassment, or did not occur in the Seminary's education program or activity against a person in the United States, the Seminary must dismiss such allegations for purposes of Title IX. The Seminary may still address the allegations in any manner the school deems appropriate under the school's own code of conduct.
- The Seminary will treat complainants equitably by providing remedies any time a respondent is found responsible, and treat respondents equitably by not imposing disciplinary sanctions without following the grievance process prescribed in the Title IX legislation.
- Remedies must be designed to maintain the complainant's equal access to education and may include the same individualized services as supportive measures; however, remedies

need not be non-disciplinary or non-punitive and need not avoid burdening the respondent, when found responsible.

- Remedies require objective evaluation of all relevant evidence, inculpatory and exculpatory, and avoid credibility determinations based on a person's status as a complainant, respondent, or witness.
- The Seminary must list the possible remedies a school may and might impose on a respondent, following determinations of responsibility, as well as the range of supportive measures available to complainants and respondents throughout the grievance process.
- The grievance process will not use, rely on, or seek disclosure of information protected under a recognized privilege, unless the person holding such privilege has waived the privilege.

Investigation Requirements – The Seminary must investigate the allegations in any formal complaint and send written notice to both parties of the allegation upon receipt of a formal complaint. The burden of gathering evidence and burden of proof remains on the Seminary, not on the parties. Investigators may not be the school's Title IX Officer.

- The Seminary must provide equal opportunity for the parties to present fact and expert witnesses and other inculpatory and exculpatory evidence during the investigation process.
- The Seminary will not restrict the ability of the parties to discuss the allegations or gather evidence.
- The Seminary must afford each party the same opportunity to select an advisor of the party's choice who may be, but need not be, an attorney.
- The Seminary must send written notice to each party of any investigative interviews, meetings, or hearings.
- The Seminary must send the parties, and their advisors, evidence directly related to the allegations, in electronic format or hard copy, with at least 10 days for the parties to inspect, review, and respond to the evidence.
- The Seminary must send the parties, and their advisors, an investigative report that fairly summarizes relevant evidence, in electronic format or hard copy, with at least 10 days for the parties to respond.
- The Seminary must dismiss allegations of conduct that do not meet the definition of sexual harassment or did not occur in a school's education program or activity against a person in the United States. This dismissal is only for Title IX purposes and does not preclude the school from addressing the conduct in any manner the Seminary deems appropriate.
- A complainant can withdraw the formal complaint and allegation as long as the party gives voluntary, informed, written consent to do so.
- The Seminary may, in their discretion, dismiss a formal complaint or allegations therein if the respondent is no longer enrolled or employed by the school, or if specific circumstances prevent the school from gathering sufficient evidence to reach a determination.
- The Seminary must give the parties written notice of a dismissal (mandatory or discretionary) and the reasons for the dismissal.

- The Seminary may, in its discretion, consolidate formal complaints where the allegations arise out of the same facts.
- To protect the privacy of each party, the Seminary may not access or use any medical, psychological, and similar treatment records unless the school obtains the party's voluntary, written consent to do so.

Informal Internal Resolution

- The Seminary, in its discretion, may choose to offer and facilitate informal resolution options as appropriate, i.e., arbitration, mediation or restorative justice, before a neutral third party, so long as both parties give voluntary, informed, written consent to attempt informal resolution.
- Any party has the right to withdraw from the informal resolution process and resume the grievance process with respect to a formal complaint at any time, in which case the Seminary will revert to its formal grievance procedures.
- Informal resolutions are not available if allegations involve an employee (faculty or staff) sexually harassing a student.
- The informal resolution process will be equitable to both parties. Both parties will be notified, in writing, of the informal resolution process, and what elements of the process will remain confidential (or not).

Live Hearings Requirements

- The Seminary must provide for a formal live hearing if a Complaint is not dismissed in the investigation phase.
- All decision makers must be trained in all technology to be used at the live hearing.
- At a live hearing, the decision makers (the Task Force) must permit each party's advisor to ask the other party and any witnesses all relevant questions and follow-up questions, including those challenging credibility.
- Cross-examination at a live hearing must be conducted directly, orally, and in real time by the party's advisor of choice and never by a party personally.
- At the request of each party, the recipient must provide for the entire live hearing (including cross-examination) to occur with the parties located in separate rooms with technology enabling the parties to see and hear each other.
- Only relevant cross-examination and other questions may be asked of a party or a witness. Before a complainant, respondent, or witness answers a cross-examination or other question, the decision-maker must first determine whether the question is relevant and explain to the party's advisor asking cross-examination questions any decision to exclude a question as not relevant.
- If a party does not have an advisor present at a live hearing, the school must provide, without fee or charge to that party, an advisor of the school's choice who may be, but is not required to be, an attorney to conduct cross-examination on behalf of that party.
- If a party or witness does not submit to cross-examination at the live hearing, the decision-makers must not rely on any statement of that party or witness in reaching a determination regarding responsibility; provided, however, that the decision-makers cannot draw an inference about the determination regarding responsibility based solely

on a party's or witness's absence from the live hearing or refusal to answer cross-examination or other questions.

- Live hearings may be conducted with all parties physically present in the same geographic location, or at the school's discretion, any or all parties, witnesses, and other participants may appear at the live hearing virtually.
- Hartford Seminary must create an audio or audiovisual recording, or transcript, of any live hearing.
- Hartford Seminary must provide rape shield protections for complainants deeming irrelevant questions and evidence about a complainant's prior sexual behavior unless offered to prove that someone other than the respondent committed the alleged misconduct or offered to prove consent.
- The decision-makers must make a written determination regarding responsibility with findings of fact, conclusions about whether the alleged conduct occurred, rationale for the result as to each allegation, any disciplinary sanctions imposed on the respondent, and whether remedies will be provided to the complainant. The written determination must be sent to the parties along with information about how to file an appeal
- In the event that the decision-makers determine that sexual harassment/violence has occurred, disciplinary sanctions imposed on the respondent may include one or more of the following:
 - a formal reprimand, with defined expectations for changed behavior;
 - recommending or requiring remedial action such as but not limited to psychological or psychiatric assessment, counseling or treatment, education and so forth;
 - probationary standing, with the terms of the probation clearly defined;
 - suspension or dismissal from the Seminary

Appeals Process

- Hartford Seminary must offer both parties an appeal from a determination regarding responsibility, and from a school's dismissal of a formal complaint or any allegations therein, on the following bases: procedural irregularity that affected the outcome of the matter, newly discovered evidence that could affect the outcome of the matter, and/or Title IX personnel had a conflict of interest or bias, that affected the outcome of the matter.
- The request for an appeal must be made in writing within 30 days to the chair of the Board of Trustees. The Chair of the Board shall refer the matter to the Executive Committee of the Board within 30 days and said committee will resolve the matter, with discretion to take any further evidence that it may deem necessary before making its final determination.

Retaliation Prohibited

- The Seminary expressly prohibits retaliation against any person for reporting any conduct under this policy or participating in any investigation or proceeding.

- The Seminary must keep confidential the identity of complainants, respondents, and witnesses, except as may be permitted by FERPA, as required by law, or as necessary to carry out a Title IX proceeding.
- Charging an individual with code of conduct violations that do not involve sexual harassment, but arise out of the same facts or circumstances as a report or formal complaint of sexual harassment, for the purpose of interfering with any right or privilege secured by Title IX constitutes retaliation.
- Charging an individual with a code of conduct violation for making a materially false statement in bad faith in the course of a Title IX grievance proceeding does not constitute retaliation; however, a determination regarding responsibility, alone, is not sufficient to conclude that any party made a bad faith materially false statement.
- Complaints alleging retaliation may be filed according to the Seminary's prompt and equitable grievance procedures.
- The exercise of rights protected under the First Amendment does not constitute retaliation.

Privacy Versus Confidentiality

To the extent possible, under federal law, if a student makes a report about an act of sexual misconduct to the Title IX Coordinator or designees, the Seminary has an obligation to investigate the complaint. The Title IX Coordinator or designees will protect the privacy of all parties to a complaint of sexual misconduct but cannot promise confidentiality. By law, employees of the Seminary are not permitted to promise confidentiality.

Note: Compliance with these provisions does not constitute a violation of section 444 of the General Education Act (20 U.S.C. 1232g), commonly known as the Family Educational Rights and Privacy Act of 1974 (FERPA.)

The Seminary community can obtain information about registered sex offenders in the State of Connecticut via the website: www.communitynotification.com.

Educational Materials to Promote Awareness and Prevention of Sexual Offenses and Dating/Domestic Violence

The Residential Life and Student Services Coordinator maintains educational materials in their office to promote awareness and prevention of sexual offenses and dating/domestic violence. Staff and students may request copies of these materials at any time. Pertinent materials are available on our website as well. However, it is recommended that those interested contact the following qualified agencies for professional information and services that include crisis counseling, a 24-hour hotline, referrals, support groups and education. All services are free and confidential. Contact information is:

Connecticut Alliance to End Sexual Violence
96 Pitkin Street
East Hartford, CT 06108
860-282-9881

<https://endsexualviolencect.org/>

info@endsexualviolencect.org

Hotline (English) 1-888-999-5545 (24/7)

Hotline (Espanol) 1-888-568-8332 (24/7)

YWCA Sexual Assault Crisis Services

75 Charter Oak Ave., Hartford, CT 06106

Hotline: 860-547-1022

<https://www.ywcanb.org/sexual-assault-crisis-services/>

Connecticut Coalition against Domestic Violence

(Support for victim/survivors of domestic or dating violence and stalking)

Statewide Hotline: 1-888-774-2900 (24/7)

Interval House Safe House

<http://intervalhousect.org/>

Definitions and Terms of Sexual Activities, Harassment, Assault and Violence

The following terms and definitions are offered as an addendum to the Clery Act Safety and Security Report as required by Federal reporting regulations. They reflect the updates in the FBI's Uniform Crime Reporting System and terms from the Federal Register and local jurisdiction. The goal is to provide a clear understanding of terms related to sexual activities, harassment, assault and violent acts.

Quid Pro Quo Harassment: A Seminary employee conditioning an individual's instruction, employment, or participation in Seminary activities upon submission to unwelcome sexual conduct and/or a Seminary employee explicitly or implicitly conditioning a student's participation in an education program or activity or bases an educational decision on the student's submission to unwelcome sexual advances, requests for sexual favors, or other verbal, nonverbal, or physical conduct of a sexual nature. Quid pro quo harassment is equally unlawful whether the student resists and suffers the threatened harm or submits and thus avoids the threatened harm.

Consent: An understandable exchange of affirmative words or actions, which indicate a willingness to participate in mutually agreed upon sexual activity. Consent must be informed, freely, and actively given. It is the responsibility of the initiator to obtain clear and affirmative responses at each stage of sexual involvement. Consent to one form of sexual activity does not imply consent to other forms of sexual activity. The lack of a negative response is not consent. An individual who is incapacitated by alcohol and/or other drugs both voluntarily and involuntarily consumed may not give consent. Past consent of sexual activity does not imply ongoing future consent.

Rape: Penetration, no matter how slight, of the vagina or anus with any body part or object, or oral penetration by a sex organ of another person, without consent of the victim.

Fondling: The touching of the private body parts of another person for the purpose of sexual gratification, without the consent of the victim, including instances, where the victim is incapable of giving consent because of his/her age and/or because of his/her temporary or permanent mental incapacity.

Incest: Nonforcible sexual intercourse between persons who are related to each other within the degrees wherein marriage is prohibited by law.

Statutory Rape: Nonforcible sexual intercourse with a person who is under the statutory age of consent.

Stalking: Engaging in a course of conduct directed at a specific person that would cause a reasonable person to fear for the person's safety or the safety of others or suffer substantial emotional distress. Course of conduct means two or more acts, including, but not limited to, acts in which the stalker directly, indirectly, or through third parties, by any action, method, device or means, follows, monitors, observes, surveils, threatens, or communicates to or about, a person, or interferes with a person's property. Substantial emotional distress means significant mental suffering or anguish that may, but does not necessarily, require medical or other professional treatment or counseling. Reasonable person means a reasonable person under similar circumstances and with similar identities to the victim.

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

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

Bystander Intervention: Safe and positive options that may be carried out by an individual or individuals to prevent harm or to intervene when there is a risk of dating violence, domestic violence, sexual assault or stalking. Bystander Intervention includes recognizing situations of potential harm, understanding institutional structures and cultural conditions that facilitate violence, overcoming barriers to intervening, identifying safe and effective intervention options, and taking action to intervene.

All Hartford Seminary employees are required to report sexual harassment to the Title IX coordinator. No paid Hartford Seminary employee can guarantee confidentiality.

Notice to the Title IX Officer or to an official with authority to institute corrective measures on the recipient's behalf, charges a school with actual knowledge and triggers the school's response obligations.

Risk Reduction: Options designed to decrease perpetration and bystander inaction, and to increase empowerment for complainants in order to promote safety and to help individuals and communities address conditions that facilitate violence.

Complainant: An individual who is alleged to be the victim of conduct that could constitute sexual harassment. Legal guardians may act on behalf of the complainant in Title IX matters.

Respondent: An individual who has been reported to be the perpetrator of conduct that could constitute sexual harassment.

Formal Complaint: A document filed by a complainant or signed by the Title IX Officer alleging sexual harassment against a respondent and requesting that the school investigate the allegation of sexual harassment.

Document Filed By a Complainant: A document or electronic submission that contains the complainant's physical or digital signature, or otherwise indicates that the complainant or their legal guardian is the person filing the formal complaint.

Supportive Measures: Individualized services reasonably available that are non-punitive, non-disciplinary, and not unreasonably burdensome to the other party while designed to ensure equal educational access, protect safety, or deter sexual harassment.

Grievance Process/Proceedings: Refers to the consistent, balanced, and transparent activities related to resolving formal complaints of sexual harassment including but not limited to independent fact-finding investigations, formal hearings, informal resolution, and appeals.

Determination: Any initial, interim, and final decision by a Seminary official - who cannot be the same person as the Title IX Officer - or designated entity/task force authorized to resolve disciplinary matters within the institution.

- Students who are found responsible for sexual assault, dating violence, or domestic violence will be suspended or expelled.
- Students found in violation of sexual harassment or stalking will be either placed on disciplinary probation, suspended or expelled.

Students that are placed on disciplinary probation or suspended may be sanctioned with intervention services, restrictions from accessing college or community buildings, and educational programs.

Fire Safety Report & Statistics

In compliance with Federal requirements, the chart below informs staff and students about the number of fires that have occurred in student housing during the last three years:

Residential Facility	Total Fires in Each Bldg	Fire Number	Cause of Fire	Injuries Requiring Medical Treatment	Deaths Related to Fire	Value of Property Damage
90 Sherman St.	0	0	N/A	0	0	0
92 Sherman St.	0	0	N/A	0	0	0
94 Sherman St.	0	0	N/A	0	0	0
96 Sherman St.	0	0	N/A	0	0	0
72 Sherman St.	0	0	N/A	0	0	0
90 Girard Ave.	0	0	N/A	0	0	0
92 Girard Ave.	0	0	N/A	0	0	0
69 Sherman St.	0	0	N/A	0	0	0

Note: No fires occurred in office buildings.

A dated fire log is maintained in the office of the Director of Administration & Facilities and is available for review with 24 hours' notice.

Fire safety is addressed during student orientations and is incorporated into our Emergency Preparedness and Response plan. Security/fire alarm systems are tested once yearly by the monitoring security company or electrical contractor, smoke alarms are maintained internally, and fire extinguishers are tested annually by an extinguisher company.

Fire Safety Guidelines

For all fire-related emergencies in campus offices and classrooms:

- Activate the nearest fire alarm IF it is on your way to exit
- Keep room doors unlocked
- Always close the door behind you when exiting
- Walk quickly to the nearest accessible exit and leave the building (see emergency exit diagrams in each housing unit, classroom and at elevators)
- If there is smoke, crawl close to floor to avoid inhaling smoke
- Move away from the building to a designated rallying location
- Notify RA and staff members of missing persons after exiting (i.e., classmates, professor)
- Do not return to the building until instructed to do so by a Seminary or Fire Dept. official

77 Sherman Street

The fire alarm at 77 Sherman Street is monitored by Monitor Controls, and it is connected to the fire department. When it sounds, it is a warning to evacuate the premises. There are evacuation diagrams posted in each classroom and in hallways near elevators. The fire department will be alerted by Monitor Controls, our alarm company. The panel outside the first floor rest rooms controls the fire alarms. If false alarm, main switch at top left of panel can be pressed to deactivate the sound.

The red fire alarm pulls are located outside restrooms on each floor as well as in various rooms throughout the building. If one is pulled by accident, the key that is on the fire panel will work to open the pull and you can then replace the white plastic bar that has been snapped (new one is stored inside alarm) in order to reset. The fire stairwell exit to the south side of the building should be used for exiting floors as well as the main center stairwell. Follow exit signs and be aware of the emergency exit diagrams on each floor.

Fire extinguishers at 77 Sherman are located in the following areas:

- Main Stairwell – Each Floor
- Kitchen
- Library

80 Sherman Street

The fire alarm at 80 Sherman Street is monitored by Monitor Controls, and it is connected to the fire department. When it sounds, it is a warning to evacuate the premises. The fire department will be alerted by Monitor Controls, our alarm company. The second floor offices should evacuate by the rear hallway fire escape. Those on the first floor can exit by the rear door, as the hallway leading to it is fire-rated.

Fire extinguishers at 80 Sherman are located in the following areas:

- 3rd Floor at Top of Stairwell
- 2nd Floor Hallway by Fire Escape
- 1st Floor Kitchen Wall & Rear Entrance

76 Sherman Street

The fire alarm at 76 Sherman Street is monitored by Monitor Controls, and it is connected to the fire department. When it sounds, it is a warning to evacuate the premises. The fire department will be alerted by Monitor Controls, our alarm company. Everyone should evacuate the building when the alarm sounds. Those in second floor offices or in the basement should leave by the interior fire stairwell which is fire-rated.

Fire extinguishers are located at 76 Sherman in the following areas:

- 2nd Floor Hallway, first closet

- 1st Floor Kitchenette
- Basement Hallway

60 Lorraine Street

The fire alarm at 60 Lorraine is serviced by Electronics Unlimited and monitored by All American Monitoring. AAM will contact the fire department should the alarm sound. When it sounds, all occupants should evacuate the building via the front or rear exits.

Fire extinguishers are located at 60 Lorraine in the following areas:

- Janitor's Closet
- Kitchen
- Copy Room

Campus Housing

For fire-related emergencies in on-campus housing, follow the instructions offered in orientation and in the housing handbook titled "Get Out and Stay Alive." If you are unable to access a stairwell to leave, use the fire ladders that are provided on each floor, and roll them out of the emergency egress windows. When you have reached safety, find a phone and call 911 if your unit has a "Sound Only" system. As noted in housing handbooks, for the safety of our residential students, candles, smoking, fireplace use or other open flames, and alternative (unauthorized) means of heating or electrical appliances are strictly prohibited in our student housing units. Please notify the Director of Administration & Facilities for candle lighting for religious purposes.

Fire extinguishers are available and clearly labeled on each floor. These are to be used to exit a building or for a minor contained fire. Otherwise, students should waste no time in exiting the building immediately.

Units 90, 92, 94 and 96 Sherman have fire alarm systems monitored by Monitor Controls. When they sound, it is a warning to evacuate the premises. The fire department will be alerted by Monitor Controls, our alarm company. Everyone should evacuate the units when the alarm sounds.

Unit 72 Sherman has a "Sound Only" fire alarm system that will yield a loud pitch notice for students to immediately exit the building when it detects smoke or fire. It also has appropriate smoke alarms throughout the unit per code.

Units 70 Lorraine, 90, 92, 98, 100 Girard and 69 Sherman have appropriate smoke alarms that will yield a high pitch notice for residents to immediately exit the building when they detects smoke.

Students must immediately exit their buildings before notifying authorities of the incident. Facilities personnel and alarm contractors test these units twice per year. However, problems with batteries or down systems should be reported to the Director of Administration & Facilities immediately. Students and visitors are not permitted to tamper with any of the alarm features.

Note: All fire extinguishers are tested annually by Smith's Fire Extinguisher Company.

Resources

Additional resources related to issues covered in this report are available on the Campus Safety page at:

<https://www.hartsem.edu/current-students/campus-safety/>

Title IX: Sexual Assault & Sexual Violence Resources

Hartford Seminary prohibits discrimination, including discriminatory harassment, sexual assault, dating violence, domestic violence, stalking, sexual or gender-based harassment, complicity in any act prohibited by this Policy, retaliating against anyone for reporting a violation of this Policy or participating in any investigation or proceeding under this policy. These forms of prohibited conduct are unlawful and undermine the mission and values of the Hartford Seminary.
All Hartford Seminary employees are required to report sexual harassment to the Title IX coordinator. No paid Hartford Seminary employee can guarantee confidentiality.

Title IX of the Education Amendments of 1972 protects both the complainants from sexual harassment, discrimination, and violence based on sex, and the respondents – who are in the United States – accused of sexual harassment, discrimination, and violence in education programs and activities that receive federal financial assistance. Education program or activity includes locations, events, or circumstances over which the Seminary exercises substantial control over both the respondent and the context in which the sexual harassment occurred. Title IX applies to all of a school's education programs or activities, whether such programs or activities occur on-campus, off-campus, or virtually. Hartford Seminary may address sexual harassment affecting its students or employees that falls outside Title IX's jurisdiction in any manner the Seminary chooses, including providing supportive measures or pursuing discipline. This policy does not limit principles of academic freedom or freedom of speech even when such speech or expression is offensive, nor does it abridge the Seminary's educational mission.

Our Title IX Officer monitors compliance with this law and ensures that complaints of this nature are appropriately and equitably addressed. Any person can report sex discrimination including sexual harassment (whether or not the person reporting is the alleged target of the conduct that could constitute sex discrimination or sexual harassment), in person, by mail, or by email, using the contact information below at any time. Questions, concerns, and reports of violations can be brought to:

Michael P. Sandner, Esq.
Chief Business Officer
Title IX Officer

77 Sherman Street
 Office 302
 Hartford, CT 06105

msandner@hartsem.edu

(860) 509-9525

Definition of Key Terms

Sexual Harassment: Sexual Harassment is broadly defined as: (1) quid pro quo harassment by a school's employee; (2) any unwelcome conduct that a reasonable person would find so severe, pervasive, and objectively offensive that it denies a person equal educational access; and (3) any instance of sexual assault (as defined in the Clery Act), dating violence, domestic violence, or stalking as defined in the Violence Against Women Act (VAWA).

Quid Pro Quo Harassment: A Seminary employee conditioning an individual's instruction, employment, or participation in Seminary activities upon submission to unwelcome sexual conduct and/or a Seminary employee explicitly or implicitly conditioning a student's participation in an education program or activity or bases an educational decision on the student's submission to unwelcome sexual advances, requests for sexual favors, or other verbal, nonverbal, or physical conduct of a sexual nature. Quid pro quo harassment is equally unlawful whether the student resists and suffers the threatened harm or submits and thus avoids the threatened harm.

Consent: An understandable exchange of affirmative words or actions, which indicate a willingness to participate in mutually agreed upon sexual activity. Consent must be informed, freely, and actively given. It is the responsibility of the initiator to obtain clear and affirmative responses at each stage of sexual involvement. Consent to one form of sexual activity does not imply consent to other forms of sexual activity. The lack of a negative response is not consent. An individual who is incapacitated by alcohol and/or other drugs both voluntarily and involuntarily consumed may not give consent. Past consent of sexual activity does not imply ongoing future consent.

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Fondling: The touching of the private body parts of another person for the purpose of sexual gratification, without the consent of the victim, including instances, where the victim is incapable of giving consent because of his/her age and/or because of his/her temporary or permanent mental incapacity.

Incest: Nonforcible sexual intercourse between persons who are related to each other within the degrees wherein marriage is prohibited by law.

Statutory Rape: Nonforcible sexual intercourse with a person who is under the statutory age of consent.

Stalking: Engaging in a course of conduct directed at a specific person that would cause a reasonable person to fear for the person's safety or the safety of others or suffer substantial emotional distress. Course of conduct means two or more acts, including, but not limited to, acts in which the stalker directly, indirectly, or through third parties, by any action, method, device or means, follows, monitors, observes, surveils, threatens, or communicates to or about, a person, or interferes with a person's property. Substantial emotional distress means significant mental suffering or anguish that may, but does not necessarily, require medical or other professional treatment or counseling. Reasonable person means a reasonable person under similar circumstances and with similar identities to the victim.

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

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

Bystander Intervention: Safe and positive options that may be carried out by an individual or individuals to prevent harm or to intervene when there is a risk of dating violence, domestic violence, sexual assault or stalking. Bystander Intervention includes recognizing situations of potential harm, understanding institutional structures and cultural conditions that facilitate violence, overcoming barriers to intervening, identifying safe and effective intervention options, and taking action to intervene.

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Complainant: An individual who is alleged to be the victim of conduct that could constitute sexual harassment. Legal guardians may act on behalf of the complainant in Title IX matters.

Respondent: An individual who has been reported to be the perpetrator of conduct that could constitute sexual harassment.

Formal Complaint: A document filed by a complainant or signed by the Title IX Officer alleging sexual harassment against a respondent and requesting that the school investigate the allegation of sexual harassment.

Document Filed by a Complainant: A document or electronic submission that contains the complainant's physical or digital signature, or otherwise indicates that the complainant or their legal guardian is the person filing the formal complaint.

Supportive Measures: Individualized services reasonably available that are non-punitive, non-disciplinary, and not unreasonably burdensome to the other party while designed to ensure equal educational access, protect safety, or deter sexual harassment.

Grievance Process/Proceedings: Refers to the consistent, balanced, and transparent activities related to resolving formal complaints of sexual harassment including but not limited to independent fact-finding investigations, formal hearings, informal resolution, and appeals.

Determination: Any initial, interim, and final decision by a Seminary official – who cannot be the same person as the Title IX Officer – or designated entity/task force authorized to resolve disciplinary matters within the institution.

- Students who are found responsible for sexual assault, dating violence, or domestic violence will be suspended or expelled.
- Students found in violation of sexual harassment or stalking will be either placed on disciplinary probation, suspended or expelled.
- Students that are placed on disciplinary probation or suspended may be sanctioned with intervention services, restrictions from accessing college or community buildings, and educational programs.

Campus Safety, Security and Fire Safety Report

Official Policies and Reporting Guidelines

GRIEVANCE PROCEDURES

Procedures for Handling Complaints of Sexual Harassment and Violence

Hartford Seminary utilizes the standard of evidence of "clear and convincing evidence" to determine responsibility. Hartford Seminary will apply this standard of evidence consistently for all formal complaints of sexual harassment whether the respondent is a student or an employee (including faculty members).

- Clear and convincing evidence is highly and substantially more likely to be true than untrue; the fact finder must be convinced that the contention is highly probable.

Both complainants and respondents of sexual harassment, sexual assault, stalking, dating violence or domestic violence will receive a written explanation of their rights and options of supportive measures and related services available to them whether or not law enforcement has been notified. Fair, impartial, and formal hearings or informal proceedings – mediation or restorative justice – will occur as prescribed by Clery Act regulations.

Hartford Seminary will resolve all Title IX proceedings (investigations, formal hearings, informal resolutions, and appeals) in a reasonable prompt time frame with the allowance for short-term good cause delays or extensions.

A Sexual Harassment/Violence Task Force will be appointed by the President of Hartford Seminary within two (2) weeks of the beginning of each academic year to address any complaints of sexual harassment or violence, including stalking and dating/domestic violence that may arise. A list of the members of the task force will be distributed to all members of the Hartford Seminary community within the first three weeks of the new academic year.

- The Sexual Harassment/Violence Task Force shall be comprised of three appropriate parties – one member from the Board of Trustees, one member from the Faculty, and one member from the Staff. Each party would serve as the sole decision maker in a formal hearing or an informal resolution on a rotational basis. If either the complainant or respondent is a member of the task force, the party must recuse themselves and an alternate must be identified as a replacement.
- The Title IX Officer cannot serve on the Sexual Harassment/Violence Task Force.
- The Sexual Harassment/Violence Task Force must issue a written determination regarding responsibility with findings of fact, conclusions about whether the alleged conduct occurred, rationale for the result as to each allegation, any disciplinary sanctions imposed on the respondent, and whether remedies will be provided to the complainant. The written determination must be sent simultaneously to the parties along with information about how to file an appeal.

Training Requirements – All Title IX personnel must be free from conflicts of interest or bias for or against complainants or respondents. All Title IX personnel (officer, investigators, and decision-makers) must include training on the definition of sexual harassment, the scope of the school's education program or activity, how to conduct an investigation and grievance process including hearings, appeals, and informal resolution processes, as applicable, and how to serve impartially, including by avoiding prejudgment of the facts at issue, conflicts of interest, and bias. The Sexual Harassment/Violence Task Force will also receive training on any technology to be used at a live hearing. All Title IX personnel shall receive training on relevance, including how to apply the rape shield protections provided only for complainants. All Title IX personnel must have a presumption that the respondent is not responsible for the alleged conduct until a determination regarding responsibility is made at the conclusion of the grievance process. All materials used to train Title IX personnel are posted on the Seminary's website.

Reporting, Response, and Remedy Requirements

The first step in the procedure is the reporting of a complaint/allegation to the Title IX Officer or the Title IX Officer receiving information about an allegation that would result in an official obligation for the Seminary to respond to the alleged complainant and/or the alleged respondent.

- The complainant must be participating in or attempting to participate in the education program or activity of the school which which the formal complaint is filed.
- The respondent must be in the United States.
- The Seminary must respond promptly to the Title IX sexual harassment allegation in a manner that is not deliberately indifferent, which means a response that is not clearly unreasonable in light of the known circumstances.
- The Title IX Officer must promptly contact the complainant confidentially to discuss the availability of supportive measures, consider the complainant's wishes with respect to supportive measures, inform the complainant of the availability of supportive measures with or without the filing of a formal complaint, and explain to the complainant the process for filing a formal complaint.
- The Title IX Officer will respect the complainant's wishes with respect to whether the Seminary investigates a sexual harassment complaint unless the Title IX Coordinator determines that signing a formal complaint to initiate an investigation over the wishes of the complainant is not clearly unreasonable in light of the known circumstances.
- Where the Title IX Officer signs a formal complaint, the Title IX Officer must not be the complainant or a party during the grievance process, and must comply with requirements for Title IX personnel to be free from conflict or bias.
- The Seminary must investigate sexual harassment allegations in any formal complaint, which can be filed by the complainant, or signed by the Title IX Officer.
- Title IX investigations may not be conducted by the Title IX Officer.
- Any provisions, rules, or practices that the Seminary adopts as part of its grievance process for handling formal complaints of sexual harassment must apply equally to both parties.
- The Seminary must follow a formal grievance process before the imposition of any disciplinary sanctions or other actions that are not supportive measures, against a respondent.
- The Seminary may remove any individual from campus immediately without a hearing when an individual's presence poses a safety threat to the campus community. In the event that an individual is removed under this exception, a disciplinary hearing will be held quickly while the removal order is still in effect.
- The Seminary must not restrict the rights protected under the US Constitution, including the First Amendment, Fifth Amendment, and Fourteenth Amendment, when complying with the Title IX. The Seminary must not use, rely on, or seek disclosure of information protected under a legally recognized privilege, unless the person holding the privilege has waived the privilege.
- If the allegations in a formal complaint do not meet the definition of sexual harassment, or did not occur in the Seminary's education program or activity against a person in the United States, the Seminary must dismiss such allegations for purposes of Title IX. The Seminary may still address the allegations in any manner the school deems appropriate under the school's own code of conduct.
- The Seminary will treat complainants equitably by providing remedies any time a respondent is found responsible, and treat respondents equitably by not imposing disciplinary sanctions without following the grievance process prescribed in the Title IX legislation.
- Remedies must be designed to maintain the complainant's equal access to education and may include the same individualized services as supportive measures; however, remedies need not be non-disciplinary or non-punitive and need not avoid burdening the respondent, when found responsible.
- Remedies require objective evaluation of all relevant evidence, inculpatory and exculpatory, and avoid credibility determinations based on a person's status as a complainant, respondent, or witness.
- The Seminary must list the possible remedies a school may and might impose on a respondent, following determinations of responsibility, as well as the range of supportive measures available to complainants and respondents throughout the grievance process.
- The grievance process will not use, rely on, or seek disclosure of information protected under a recognized privilege, unless the person holding such privilege has waived the privilege.

Investigation Requirements – The Seminary must investigate the allegations in any formal complaint and send written notice to both parties of the allegation upon receipt of a formal complaint. The burden of gathering evidence and burden of proof remains on the Seminary, not on the parties. Investigators may not be the school's Title IX Officer.

- The Seminary must provide equal opportunity for the parties to present fact and expert witnesses and other inculpatory and exculpatory evidence during the investigation process.
- The Seminary will not restrict the ability of the parties to discuss the allegations or gather evidence.
- The Seminary must afford each party the same opportunity to select an advisor of the party's choice who may be, but need not be, an attorney.
- The Seminary must send written notice to each party of any investigative interviews, meetings, or hearings.
- The Seminary must send the parties, and their advisors, evidence directly related to the allegations, in electronic format or hard copy, with at least 10 days for the parties to inspect, review, and respond to the evidence.
- The Seminary must send the parties, and their advisors, an investigative report that fairly summarizes relevant evidence, in electronic format or hard copy, with at least 10 days for the parties to respond.
- The Seminary must dismiss allegations of conduct that do not meet the definition of sexual harassment or did not occur in a school's education program or activity against a person in the United States. This dismissal is only for Title IX purposes and does not preclude the school from addressing the conduct in any manner the Seminary deems appropriate.
- A complainant can withdraw the formal complaint and allegation as long as the party gives voluntary, informed, written consent to do so.
- The Seminary may, in its discretion, dismiss a formal complaint or allegations therein if the respondent is no longer enrolled or employed by the school, or if specific circumstances prevent the school from gathering sufficient evidence to reach a determination.
- The Seminary must give the parties written notice of a dismissal (mandatory or discretionary) and the reasons for the dismissal.
- The Seminary may, in its discretion, consolidate formal complaints where the allegations arise out of the same facts.
- To protect the privacy of each party, the Seminary may not access or use any medical, psychological, and similar treatment records unless the school obtains the party's voluntary, written consent to do so.

Informal Internal Resolution

- The Seminary, in its discretion, may choose to offer and facilitate informal resolution options as appropriate, i.e., arbitration, mediation or restorative justice, before a neutral third party, so long as both parties give voluntary, informed, written consent to attempt informal resolution.
- Any party has the right to withdraw from the informal resolution process and resume the grievance process with respect to a formal complaint at any time, in which case the Seminary will revert to its formal grievance procedures.
- Informal resolutions are not available if allegations involve an employee (faculty or staff) sexually harassing a student.
- The informal resolution process will be equitable to both parties. Both parties will be notified, in writing, of the informal resolution process, and what elements of the process will remain confidential (or not).

Live Hearings Requirements

- The Seminary must provide for a formal live hearing if a Complaint is not dismissed in the investigation phase.
- All decision makers must be trained in all technology to be used at the live hearing.
- At a live hearing, the decision makers (the Task Force) must permit each party's advisor to ask the other party and any witnesses all relevant questions and follow-up questions, including those challenging credibility.
- Cross-examination at a live hearing must be conducted directly, orally, and in real time by the party's advisor of choice and never by a party personally.
- At the request of each party, the recipient must provide for the entire live hearing (including cross-examination) to occur with the parties located in separate rooms with technology enabling the parties to see and hear each other.
- Only relevant cross-examination and other questions may be asked of a party or a witness. Before a complainant, respondent, or witness answers a cross-examination or other question, the decision-maker must first determine whether the question is relevant and explain to the party's advisor asking cross-examination questions any decision to exclude a question as not relevant.
- If a party does not have an advisor present at a live hearing, the school must provide, without fee or charge to that party, an advisor of the school's choice who may be, but is not required to be, an attorney to conduct cross-examination on behalf of that party.
- If a party or witness does not submit to cross-examination at the live hearing, the decision-makers must not rely on any statement of that party or witness in reaching a determination regarding responsibility; provided, however, that the decision-makers cannot draw an inference about the determination regarding responsibility based solely on a party's or witness's absence from the live hearing or refusal to answer cross-examination or other questions.
- Live hearings may be conducted with all parties physically present in the same geographic location, or at the school's discretion, any or all parties, witnesses, and other participants may appear at the live hearing virtually.
- Hartford Seminary must create an audio or audiovisual recording, or transcript, of any live hearing.
- Hartford Seminary must provide rape shield protections for complainants deeming irrelevant questions and evidence about a complainant's prior sexual behavior unless offered to prove that someone other than the respondent committed the alleged misconduct or offered to prove consent.
- The decision-makers must make a written determination regarding responsibility with findings of fact, conclusions about whether the alleged conduct occurred, rationale for the result as to each allegation, any disciplinary sanctions imposed on the respondent, and whether remedies will be provided to the complainant. The written determination must be sent to the parties along with information about how to file an appeal.
- In the event that the decision-makers determine that sexual harassment/violence has occurred, disciplinary sanctions imposed on the respondent may include one or more of the following:
 - a formal reprimand, with defined expectations for changed behavior;
 - recommending or requiring remedial action such as but not limited to psychological or psychiatric assessment, counseling or treatment, education and so forth;
 - probationary standing, with the terms of the probation clearly defined;
 - suspension or dismissal from the Seminary

Appeals Process

- Hartford Seminary must offer both parties an appeal from a determination regarding responsibility, and from a school's dismissal of a formal complaint or any allegations therein, on the following bases: procedural irregularity that affected the outcome of the matter, newly discovered evidence that could affect the outcome of the matter, and/or Title IX personnel had a conflict of interest or bias, that affected the outcome of the matter.
- The request for an appeal must be made in writing within 30 days to the chair of the Board of Trustees. The Chair of the Board shall refer the matter to the Executive Committee of the Board within 30 days and said committee will resolve the matter, with discretion to take any further evidence that it may deem necessary before making its final determination.

Retaliation Prohibited

- The Seminary expressly prohibits retaliation against any person for reporting any conduct under this policy or participating in any investigation or proceeding.
- The Seminary must keep confidential the identity of complainants, respondents, and witnesses, except as may be permitted by FERPA, as required by law, or as necessary to carry out a Title IX proceeding.
- Charging an individual with a code of conduct violations that do not involve sexual harassment, but arise out of the same facts or circumstances as a report or formal complaint of sexual harassment, for the purpose of interfering with any right or privilege secured by Title IX constitutes retaliation.
- Charging an individual with a code of conduct violation for making a materially false statement in bad faith in the course of a Title IX grievance proceeding does not constitute retaliation; however, a determination regarding responsibility, alone, is not sufficient to conclude that any party made a bad faith materially false statement.
- Complaints alleging retaliation may be filed according to the Seminary's prompt and equitable grievance procedures.
- The exercise of rights protected under the First Amendment does not constitute retaliation.

Getting Help

Educational Materials to Promote Awareness and Prevention of Sexual Offenses and Dating/Domestic Violence

Hartford Seminary has educational materials to promote awareness and prevention of sexual offenses and dating/domestic violence. Staff and students may request copies of these materials at any time. Pertinent materials are available on our website as well. However, it is recommended that those interested contact the following qualified agencies for professional information and services that include crisis counseling, a 24-hour hotline, referrals, support groups and education. All services are free and confidential.

The Seminary community can obtain information about registered sex offenders in the State of Connecticut via the website: www.communitynotification.com.

Getting Help, on Campus

The Hartford Seminary Title IX Officer oversees the review, investigation, and resolution of reports of sexual harassment, sexual violence and intimate partner violence. The Officer also oversees overall compliance with Title IX and is supported by the Area Coordinator. You can contact any of the following people. If you are the victim of a sexual assault, or are helping a victim, please read the Resources for Victims section of this page.

Title IX Officer

Michael Sandner, Esq.
Chief Business Officer
3rd Floor, 77 Sherman
msandner@hartsem.edu
860.509.9525

Area Coordinator

Lorraine Browne
Executive Assistant to the President & Human Resource Manager
3rd Floor, 77 Sherman
lbrowne@hartsem.edu
860.509.9502

Getting Help, off Campus

YWCA of New Britain Sexual Assault Crisis Hotline, 24 hours per day:
New Britain: 860-223-1787
Hartford: 860-547-1022

[Connecticut Alliance to End Sexual Violence](#) (formerly CONNSACS)

96 Pitkin Street
East Hartford, CT 06108
860.282.9881; info@endsexualviolencect.org
Hotline (English) 1-888-999-5545 (24/7)
Hotline (Espanol) 1-888-568-8332 (24/7)

[Connecticut Coalition Against Domestic Violence](#)

(Support for victim/survivors of domestic or dating violence and stalking)
Statewide Hotline: 1-888-774-2900 (24/7)

[Intervist House:](#) 24 Hour domestic violence hotline 860.327.0550 or 1.888.774.2900

[Hartford Police Department:](#) 860.757.4000, or 911

[NotAlone.gov](#)

Resources for Victims

Victims are encouraged to report sexual offenses and acts of violence to the Hartford Police Department using the "911" phone number for immediate notification, or the (860) 757-4000 direct phone line to the department.

If you have been sexually assaulted, it is important that you seek medical attention as soon as possible after the assault.

- To treat physical injuries
- To ascertain the risk of sexually transmitted diseases or pregnancy and intervene accordingly
- To gather and preserve evidence that could aid prosecution. Evidence should be collected immediately. After the first 24 hours, the quality of evidence usually decreases, but can be collected up to 72 hours after the assault. The evidence collection can be performed at any of the area hospital emergency rooms, usually takes about four hours, and you may have a support person present during the exam. You are encouraged not to bathe, brush your teeth, use the toilet, douche, or change clothing.

St. Francis Hospital
860.714.4001

Hartford Hospital
860.524.2525

Connecticut General Statute 19a-112a (e): No costs incurred by a healthy care facility shall be charged directly or indirectly to such victim for the examination of a victim of sexual assault, when such examination is performed for the purpose of gathering evidence as prescribed in the protocol, including the costs of testing for pregnancy and sexually transmitted diseases and costs of prophylactic treatment as provided in the protocol. Any such costs shall be charged to the Office of Victim Services within the Judicial Department.

If you seek treatment at a local hospital and the police are contacted, this does not mean you have to proceed with criminal charges.

Training Resources

Hartford Seminary has been using SafeColleges Students to offer training courses online for your convenience.

The training does contain sensitive material involving sexual and interpersonal violence. While trigger warnings and resources are provided throughout the program, we understand such programming may be problematic for some viewers. Please contact Liza Arulampalam, Student Services, at arulampalam@hartsem.edu for support and/or to discuss alternatives for training. Please note – waivers will not be granted to students based on a high level of knowledge of this topic or previous training participation.

Follow these easy steps to complete your Hartford Seminary Title IX training requirements.

Using your web browser, go to the SafeColleges Students website for Hartford Seminary located at: <https://hartsemstudents-ct.safecolleges.edu/>

Enter your USERNAME, (which was provided in a email to your student email account) – and that's all you need to do. Just verify your identity after entering your username (no password required) and complete the two training modules.

If you encounter any technical issues logging in or completing training, please contact Michael Sandner, Title IX Officer, at msandner@hartsem.edu.

Join our mailing list!

Keep up with all the latest happenings at Hartford Seminary



[Sign-up now >](#)

TITLE IX: THE INS AND OUTS

MICHAEL P. SANDNER, ESQ.

CHIEF BUSINESS OFFICER

TITLE IX OFFICER

ACTING DIRECTOR OF HUMAN RESOURCES

77 SHERMAN STREET; 3RD FLOOR

MSANDNER@HARTSEM.EDU

860.509.5925

REQUIREMENT

- UPON COMPLETION OF THIS TRAINING:
 - TAKE MANDATORY QUIZ LOCATED IN CANVAS ORIENTATION SITE. **YOU MUST SCORE AT LEAST 80%.**
 - IF YOU DO NOT COMPLETE THIS TRAINING & PASS QUIZ WITHIN THE REQUIRED TIME PERIOD, THERE WILL BE A REGISTRATION HOLD PLACED ON YOUR ACCOUNT.

WHAT IS TITLE IX?

- LANDMARK FEDERAL CIVIL RIGHT THAT PROHIBITS SEX DISCRIMINATION IN EDUCATION
- TITLE IX COMES FROM THE EDUCATION AMENDMENTS OF 1972
 - 20 U.S.C. § 1681 (A) – “NO PERSON IN THE UNITED STATES SHALL, ON THE BASIS OF SEX, BE EXCLUDED FROM PARTICIPATION IN, BE DENIED THE BENEFITS OF, OR BE SUBJECTED TO DISCRIMINATION UNDER ANY EDUCATION PROGRAM OR ACTIVITY RECEIVING FEDERAL FINANCIAL ASSISTANCE.”
 - “FEDERAL FINANCIAL ASSISTANCE” – MOST COMMON → FEDERAL FUNDS (GRANTS OR LOANS) ISSUED TO THE EDUCATIONAL INSTITUTION BY THE DEPARTMENT OF EDUCATION FOR THE BENEFIT OF ITS STUDENTS
- ADDRESSES SEXUAL HARASSMENT, HOSTILE EDUCATIONAL/WORK ENVIRONMENT, GENDER-BASED DISCRIMINATION, AND SEXUAL VIOLENCE

TITLE IX MISCONCEPTION

- “NOT AT OUR SCHOOL!”
 - “WE ARE A SEMINARY AND A THEOLOGICAL INSTITUTION. ADULTS KNOW BETTER. NOTHING GOES ON AT OUR CAMPUS.”
- SEXUAL VIOLENCE STATISTICS ON CAMPUSES ARE RISING!
 - 13% OF ALL STUDENTS EXPERIENCE NON-CONSENSUAL SEXUAL CONTACT BY PHYSICAL FORCE OR INABILITY TO CONSENT (AMONG ALL GRADUATE AND UNDERGRADUATE STUDENTS).
 - AMONG GRADUATE AND PROFESSIONAL STUDENTS, 9.7% OF FEMALES AND 2.5% OF MALES EXPERIENCE RAPE OR SEXUAL ASSAULT THROUGH PHYSICAL FORCE, VIOLENCE, OR INCAPACITATION.
 - 5.8% OF STUDENTS HAVE EXPERIENCED STALKING SINCE ENTERING COLLEGE.

IMMEDIATELY DIAL 911 IF YOU HAVE BEEN SEXUALLY ASSAULTED

AND SEEK MEDICAL ATTENTION AS SOON AS POSSIBLE

- TO TREAT PHYSICAL INJURIES
- TO ASCERTAIN THE RISK OF SEXUALLY TRANSMITTED DISEASE OR PREGNANCY AND INTERVENE ACCORDINGLY
- TO GATHER AND PRESERVE EVIDENCE THAT COULD AID PROSECUTION
- DOES NOT MEAN YOU HAVE TO PROCEED WITH CRIMINAL CHARGES OR FORMAL COMPLAINTS THROUGH THE SEMINARY

SCOPE & RIGHTS UNDER TITLE IX

- TITLE IX PROTECTS ALL CURRENT STUDENTS, FACULTY, & STAFF IN THE UNITED STATES, REGARDLESS OF WHETHER THEY ARE A COMPLAINANT OR RESPONDENT AND REGARDLESS OF THEIR SEXUAL OR GENDER IDENTITY.
- TITLE IX APPLIES TO ALL OF A SCHOOL'S EDUCATION PROGRAMS OR ACTIVITIES IN THE UNITED STATES (ON-CAMPUS, OFF-CAMPUS, OR VIRTUALLY).
- STUDENTS, FACULTY, & STAFF HAVE THE RIGHT TO:
 - BE FREE FROM ALL TYPES OF SEXUAL HARASSMENT
 - BRING FORWARD A COMPLAINT IN GOOD FAITH
 - BE INFORMED OF COMPLAINT PROCEDURES AND OPTIONS FOR RESOLUTION
 - EXPECT A COMPLAINT TO BE THOROUGHLY & IMPARTIALLY INVESTIGATED
 - INTERIM SUPPORTIVE MEASURES TO ENSURE SAFETY PENDING OUTCOME OF INVESTIGATION
 - BE ADVISED OF OUTCOME OF INVESTIGATION AND/OR DETERMINATION FROM HEARING
 - APPEAL THE OUTCOME OF INVESTIGATION FINDING AND/OR DETERMINATION FROM HEARING
 - BE FREE FROM RETALIATION

HARTSEM'S COMMITMENT

- HARTSEM'S POLICIES PROHIBIT SEXUAL HARASSMENT OF ANY KIND.
- HARTSEM IS COMMITTED TO PROMOTING A SAFE AND SECURE ACADEMIC ENVIRONMENT FOR ALL MEMBERS OF OUR COMMUNITY.
- HARTSEM MUST TAKE PROMPT AND EFFECTIVE ACTION TO STOP SEXUAL HARASSMENT, ELIMINATE A HOSTILE ENVIRONMENT AND ADDRESS ITS EFFECTS.
- CONDUCT INVESTIGATIONS SEPARATE FROM AND INDEPENDENT OF ANY CRIMINAL INVESTIGATION OR PROCEEDING.
- ADOPT EQUITABLE GRIEVANCE PROCEDURES FOR BOTH PARTIES.

SEXUAL HARASSMENT

- SEXUAL HARASSMENT IS BROADLY DEFINED AS ANY INSTANCE OF MISCONDUCT ON THE BASIS OF SEX, ALL WHICH JEOPARDIZE THE EQUAL ACCESS TO EDUCATION.
- TYPES
 - QUID PRO QUO (THIS FOR THAT) HARASSMENT BY A SCHOOL'S EMPLOYEE
 - ANY UNWELCOME CONDUCT THAT A REASONABLE PERSON WOULD FIND SO SEVERE, PERVASIVE, AND OBJECTIVELY OFFENSIVE THAT IT DENIES A PERSON EQUAL EDUCATIONAL ACCESS
 - ANY INSTANCE OF SEXUAL ASSAULT, DATING VIOLENCE, DOMESTIC VIOLENCE, OR STALKING

EXAMPLES OF SEXUAL HARASSMENT

- UNWELCOME SEXUAL ADVANCES
- SEXUAL EPITHETS, JOKES, GOSSIP REGARDING ANOTHER'S SEX LIFE, SEXUAL ORIENTATION, OR GENDER IDENTITY
- LEERING, WHISTLING, OBSCENE GESTURES
- SEXUAL ASSAULT, VIOLENCE, THREATS, STALKING
- INSULTS OR THREATS BASED ON SEX OR GENDER
- CHANGE OF ACADEMIC OR EMPLOYMENT RESPONSIBILITIES BASED ON SEX, GENDER IDENTITY OR EXPRESSION, OR SEXUAL ORIENTATION
- QUID PRO QUO – “THIS FOR THAT”
- CROSSING PROFESSIONAL LINES – FACULTY/STUDENT, STAFF/STUDENT

THE ROLE OF ALCOHOL AND DRUGS IN SEXUAL HARASSMENT

- ALCOHOL AND DRUG USE CAN CLOUD YOUR JUDGMENT AND CAUSE YOU TO MAKE DECISIONS YOU WOULD NOT MAKE IF YOU WERE SOBER.
- THE USE OF ALCOHOL AND/OR DRUGS CAN AFFECT YOUR ABILITY TO FEND OFF UNWELCOME SEXUAL HARASSMENT AND MAY NOT ALLOW YOU TO GIVE CONSENT.
- BEING INTOXICATED DOES NOT GIVE SOMEONE PERMISSION TO DO SOMETHING WITHOUT YOUR CONSENT.

CONSENT

- INFORMED, POSITIVE, UNAMBIGUOUS, ONGOING, AND VOLUNTARY AGREEMENT TO ENGAGE IN SPECIFIC SEXUAL ACTIVITY THROUGHOUT THE SEXUAL ENCOUNTER.
- CANNOT BE INFERRED; THE LACK OF A NEGATIVE RESPONSE IS NOT CONSENT.
- CONSENT TO SOME ACTS DOES NOT CONSTITUTE CONSENT TO OTHERS.
- PAST CONSENT DOES NOT CONSTITUTE PRESENT OR FUTURE CONSENT.
- CAN BE REVOKED AT ANY TIME.
- INCAPACITATION DOES NOT CONSTITUTE CONSENT.

BYSTANDER INTERVENTION

- BYSTANDER INTERVENTION IS DEVELOPING THE AWARENESS, SKILLS, AND COURAGE NEEDED TO INTERVENE IN A SITUATION WHEN ANOTHER INDIVIDUAL NEEDS HELP.
- ALLOWS INDIVIDUALS TO SEND A POWERFUL MESSAGE ABOUT WHAT IS AND NOT ACCEPTABLE BEHAVIOR IN OUR COMMUNITY.
- THE THREE D'S
 - DIRECT – DIRECTLY INTERVENING, IN THE MOMENT, TO PREVENT A PROBLEM SITUATION FROM HAPPENING.
 - DELEGATE – SEEK HELP FROM ANOTHER INDIVIDUAL SUCH AS FACULTY/STAFF OR POLICE.
 - DISTRACT – INTERRUPTING THE SITUATION WITHOUT DIRECTLY CONFRONTING THE OFFENDER.

TITLE IX REPORTING:

IF YOU SEE SOMETHING, HEAR SOMETHING, KNOW SOMETHING...SAY SOMETHING

- YOU CAN REPORT AN INCIDENT TO:
 - MICHAEL P. SANDNER (TITLE IX OFFICER) – MSANDNER@HARTSEM.EDU OR 860.509.9525
- **FACULTY AND STAFF ARE MANDATORY REPORTERS OF SEXUAL HARASSMENT**, BUT MUST LIMIT REPORTING TO ONLY THOSE THAT “NEED TO KNOW.”
- STUDENTS ARE NOT MANDATORY REPORTERS UNLESS THEY HOLD SOME SORT OF AUTHORITY/SUPERVISORY ROLE OVER OTHERS AT THE SEMINARY.
- FACULTY AND STAFF CANNOT PROMISE CONFIDENTIALITY.
- NOT ALL REPORTS NEED TO LEAD TO A FORMAL COMPLAINT. IF YOU ARE UNSURE OR UNEASY, REPORT IT.
- FORMAL COMPLAINTS CAN BE FILED BY AN ALLEGED VICTIM OR SIGNED BY THE TITLE IX OFFICER.

FORMAL COMPLAINT:

THE PARTIES

- **COMPLAINANT** – AN INDIVIDUAL WHO IS ALLEGED TO BE THE VICTIM OF CONDUCT THAT COULD CONSTITUTE SEXUAL HARASSMENT AND MUST BE PARTICIPATING IN OR ATTEMPTING TO PARTICIPATE IN THE EDUCATION PROGRAM OR ACTIVITY OF THE SCHOOL WITH WHICH THE FORMAL COMPLAINT IS FILED.
- **RESPONDENT** – AN INDIVIDUAL WHO HAS BEEN REPORTED TO BE THE PERPETRATOR OF CONDUCT THAT COULD CONSTITUTE SEXUAL HARASSMENT.

POST-REPORTING: INVESTIGATIONS

- INVESTIGATIONS MUST BE THOROUGH, RELIABLE, AND IMPARTIAL FOR BOTH THE COMPLAINANT AND RESPONDENT. NOTICE MUST BE GIVEN THROUGHOUT THE PROCESS.
- BOTH PARTIES HAVE THE OPPORTUNITY TO PRESENT WITNESSES AND EVIDENCE DURING THE PROCESS AND SELECT AN ADVISOR OF THEIR CHOOSING WHO MAY BE, BUT NEED NOT BE, AN ATTORNEY.
- THE EVIDENCE OBTAINED AND INVESTIGATIVE REPORT MUST BE SENT TO BOTH PARTIES FOR REVIEW AND RESPONSE.
- THE SEMINARY REVIEWS THE INVESTIGATIVE REPORT & THE PARTIES' RESPONSE TO DETERMINE WHETHER TO PROCEED WITH THE GRIEVANCE PROCESS OR DISMISS THE FORMAL COMPLAINT.
- THE COMPLAINANT CAN WITHDRAW THE FORMAL COMPLAINT AND ALLEGATION WITH VOLUNTARY, INFORMED, AND WRITTEN CONSENT.
- IT IS UNLAWFUL TO RETALIATE AGAINST AN INDIVIDUAL WHO HAS MADE A COMPLAINT OF SEXUAL HARASSMENT OR WHO PARTICIPATED IN THE INVESTIGATION OF SUCH A COMPLAINT.

POST-REPORTING: INFORMAL RESOLUTION & FORMAL HEARINGS

- THE SEMINARY MAY CHOOSE TO OFFER AND FACILITATE INFORMAL RESOLUTION OPTIONS, SUCH AS MEDIATION OR RESTORATIVE JUSTICE, IF BOTH PARTIES CONSENT.
- HARTFORD SEMINARY MUST PROVIDE FOR A FORMAL LIVE HEARING IF THE INVESTIGATION DETERMINES IT REQUIRES ONE. HEARINGS MUST BE CONDUCTED DIRECTLY, ORALLY, AND IN REAL TIME, BUT PARTIES MAY BE LOCATED IN SEPARATE ROOMS.
- BOTH PARTIES ARE ALLOWED TO PRESENT AND CROSS-EXAMINE EVIDENCE/WITNESSES.
- IF A PARTY DOES NOT HAVE AN ADVISOR DURING A HEARING, ONE MUST BE PROVIDED, WITHOUT FEE, TO CONDUCT CROSS-EXAMINATION.
- RAPE SHIELD PROTECTIONS MUST BE AFFORDED TO COMPLAINANTS UNLESS PRIOR BEHAVIOR EVIDENCE OFFERED IS USED TO PROVE CONSENT OR ANOTHER PERPETRATOR COMMITTED THE ALLEGED MISCONDUCT.
- THE DECISION-MAKERS MUST MAKE A DETERMINATION IF SEXUAL HARASSMENT OCCURRED AND WHAT ACTION MUST BE TAKEN IF FOUND RESPONSIBLE — REPRIMAND, REMEDIAL ACTION, PROBATION, SUSPENSION, OR DISMISSAL.
- THE REMEDIES SHOULD END DISCRIMINATION, PREVENT RECURRENCE, AND REMEDY EFFECTS UPON THE VICTIM AND THE COMMUNITY.
- DETERMINATION CAN BE APPEALED.

CT & NATIONAL RESOURCES

- CONNECTICUT ALLIANCE TO END SEXUAL VIOLENCE
 - ENDSEXUALVIOLENCECT.ORG
 - HOTLINE – 1.888.999.5545
- YWCA SEXUAL ASSAULT CRISIS HOTLINE
 - 860.547.1022
- NATIONAL SEXUAL ASSAULT HOTLINE
 - 1.800.656.HOPE
- US DEPARTMENT OF EDUCATION OFFICE OF CIVIL RIGHTS
 - 1.800.421.3481
- RAINN.ORG

SEXUAL CONSENT SCENARIO EXERCISES

- TWO STUDENTS ARE DATING. STUDENT A IS UNCERTAIN ABOUT HAVING SEX, BUT THEN VOLUNTARILY AGREES TO ENGAGE. AS THEY HAVE SEX, STUDENT A SAYS TO STUDENT B – “WAIT, STOP THAT HURTS”, BUT STUDENT B NONETHELESS CONTINUES WITH NO FURTHER OBJECTION BY STUDENT A.
- TWO STUDENTS ARE DATING. ON SEVERAL OCCASIONS, THEY BECOME PHYSICALLY INTIMATE WITH LIMITS SET. STUDENT A BEGINS TO CROSS THE AGREED UPON LIMITS. STUDENT B REPLIES THAT, “WE SHOULDN’T DO THIS. THIS IS A BAD IDEA.” STUDENT A CONTINUES TO ADVANCE. STUDENT B BEGINS TO CRY, BUT THEN EMBRACES STUDENT A, AND THE TWO PROCEED TO HAVE SEX.

SEXUAL CONSENT SCENARIO EXERCISES

- TWO STUDENTS HAVE BEEN FLIRTING ALL SEMESTER AND MEET AT A PARTY. STUDENT A SUGGESTS TO STUDENT B THEY GO TO STUDENT A'S ROOM. STUDENT B AGREES. ONCE IN THE ROOM, THEY BEGIN TO TOUCH AND PAY ATTENTION TO EACH OTHER'S SIGNALS. THEY ENGAGE IN SEX
- TWO STUDENTS ARE STUDYING. DURING A STUDY BREAK, STUDENT A BEGINS TO RUB THE SHOULDERS OF STUDENT B. STUDENT B BEGINS TO INTRODUCE INTIMATE TOUCHING. STUDENT A MOVES CLOSER, BUT SAYS, "WE STILL HAVE A LOT OF STUDYING TO DO. I DON'T WANT TO GO TOO FAR." STUDENT B JOKES THAT THEY DESERVE TO HAVE SEX WITH THE AMOUNT OF STUDYING THEY ARE DOING. STUDENT A LAUGHS, AND THEY CONTINUE TO STUDY. AFTER STUDYING, STUDENT B SUGGESTS HAVING SEX AGAIN. STUDENT A SUGGESTS THEY SHOULD GET SOME SLEEP, BUT THE INTIMATE TOUCHING CONTINUES. STUDENT B ASKS ONE FINAL TIME. STUDENT A PAUSES, AND SAYS OKAY. THEY ENGAGE IN SEX.

SEXUAL CONSENT SCENARIO EXERCISES

- TWO STUDENTS ARE AT A PARTY AND BEGIN DANCING WITH OTHER PEOPLE. THE ROOM IS CROWDED, AND THEY ARE PRESSED AGAINST EACH OTHER. STUDENT A BEGINS TO DRINK AND PASSES STUDENT B IN THE HALLWAY AND SMILES. STUDENT A IS HEADING TO THE BATHROOM. STUDENT B FOLLOWS STUDENT A INTO THE BATHROOM AND FORCES STUDENT A TO HAVE SEX.
- TWO FRIENDS ARE A PARTY AND BEGIN TO DRINK, BUT NOT TO THE POINT OF INTOXICATION. BOTH STUDENTS DECIDE TO GO TO STUDENT A'S ROOM. THEY PROCEED TO ENGAGE IN PHYSICAL TOUCHING. STUDENT B OFFERS TO PERFORM A SEX ACT ON STUDENT A. STUDENT A AGREES. WITHOUT HESITATION, STUDENT A BEGINS TO PERFORM A MUTUAL SEX ACT ON STUDENT B. STUDENT B LIES STILL FOR A FEW MINUTES, THEN MOVES AWAY, SAYING IT'S LATE AND THEY SHOULD SLEEP.