



Hartford International
UNIVERSITY FOR RELIGION & PEACE

TO: STATE OF CONNECTICUT

FROM: HARTFORD INTERNATIONAL UNIVERSITY FOR RELIGION & PEACE
MICHAEL P. SANDNER, ESQ., TITLE IX OFFICER

DATE: October 1, 2023

RE: PA 14-11 REPORTS FOR January 1, 2022 – December 31, 2022

Pursuant to General Statutes Section 10a-55m, Section 2(f), Hartford International University for Religion & Peace submits the following information pertaining to the time period of January 1, 2022 – December 31, 2022.

1. Hartford International University for Religion & Peace's Policies Regarding Sexual Assault, Stalking, and Intimate Partner Violence

Attached please find a copy of Hartford International University for Religion & Peace's definitions and policies regarding sexual harassment, assault, stalking, and intimate partner violence.

2. Hartford International University for Religion & Peace's Concise Written Notification of a Victim's Rights and Options

Attached please find a copy of a portion of Hartford International University for Religion & Peace's comprehensive Campus Safety, Security, and Fire Report for 2022 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 International University for Religion & Peace's Sexual Assault, Stalking, and Intimate Partner Violence Prevention, Awareness, and Risk Reduction Programs

Attached please find a copy of a portion of Hartford International University for Religion & Peace's website on Title IX which details out resources and statistics on sexual assault, stalking, and intimate partner violence. Hartford International University for Religion & Peace 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 International University for Religion & Peace also partners with Safe Colleges to provide online training for staff, faculty, and students on Title IX, Sexual Harassment, and Active Shooter. In addition, Hartford International University uses Title IX Solutions to train our Title IX Officer and our Decision Makers.

4. Hartford International University for Religion & Peace's Sexual Assault, Stalking, and Intimate Partner Violence Prevention and Awareness Campaigns

Attached please find a copy of a portion of Hartford International University for Religion & Peace'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 International University for Religion & Peace

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.

Student Affairs » Student Resources » Title IX: Sexual Assault & Sexual Violence Resources

Title IX: Sexual Assault & Sexual Violence Resources

Hartford International 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 International.

All Hartford International employees are required to report sexual harassment to the Title IX coordinator. No paid Hartford International 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 Hartford International 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 International may address sexual harassment affecting its students or employees that falls outside Title IX's jurisdiction in any manner the Hartford International 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 Hartford International'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@hartfordinternational.edu

(860) 509-9525

Definition of Key Terms

(860) 509-9525

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 Hartford International employee conditioning an individual's instruction, employment, or participation in Hartford International activities upon submission to unwelcome sexual conduct and/or a Hartford International 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 International employees are required to report sexual harassment to the Title IX coordinator. No paid Hartford International 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 Hartford International 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

Campus Safety, Security, and Fire Report for 2021

Official Policies and Reporting Guidelines

GRIEVANCE PROCEDURES

Procedures for Handling Complaints of Sexual Harassment and Violence

Hartford International utilizes the standard of evidence of “clear and convincing evidence” to determine responsibility. Hartford International 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 International 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 International 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 International 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 Hartford International'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 Hartford International 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 Hartford International 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 Hartford International 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 Hartford International 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 Hartford International adopts as part of its grievance process for handling formal complaints of sexual harassment must apply equally to both parties.
- The Hartford International 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 Hartford International 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 Hartford International 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 Hartford International 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 Hartford International's education program or activity against a person in the United States, the Hartford International must dismiss such allegations for purposes of Title IX. The Hartford International may still address the allegations in any manner the school deems appropriate under the school's own code of conduct.
- The Hartford International 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 Hartford International 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 Hartford International 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 Hartford International, not on the parties. Investigators may not be the school's Title IX Officer.

- The Hartford International must provide equal opportunity for the parties to present fact and expert witnesses and other inculpatory and exculpatory evidence during the investigation process.
- The Hartford International will not restrict the ability of the parties to discuss the allegations or gather evidence.
- The Hartford International 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 Hartford International must send written notice to each party of any investigative interviews, meetings, or hearings.
- The Hartford International 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 Hartford International 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 Hartford International 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 Hartford International 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 Hartford International 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 Hartford International must give the parties written notice of a dismissal (mandatory or discretionary) and the reasons for the dismissal.
- The Hartford International may, in its discretion, consolidate formal complaints where the allegations arise out of the same facts.
- To protect the privacy of each party, the Hartford International 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 Hartford International, 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 Hartford International 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 Hartford International 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 International must create an audio or audiovisual recording, or transcript, of any live hearing.
- Hartford International 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 Hartford International

Appeals Process

- Hartford International 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 Hartford International expressly prohibits retaliation against any person for reporting any conduct under this policy or participating in any investigation or proceeding.
- The Hartford International 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 Hartford International'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 International 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 Hartford International 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 International 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@hartfordinternational.edu

860.509.9525

Area Coordinator

Lorraine Browne

Executive Assistant to the President & Human Resource Manager

3rd Floor, 77 Sherman

lbrowne@hartfordinternational.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 (Español) 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)

Interval House: 24 Hour domestic violence hotline 860.527.0550 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 International University requires ALL EMPLOYEES to complete Title IX training through Safe Colleges/Vector Solutions - <https://www.vectorsolutions.com/solutions/vector-lms/higher-education/sexual-assault-prevention/>. This is a one-time online training incorporated in a new employee's onboarding experience. 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 Michael Sandner, Title IX Officer, at msandner@hartfordinternational.edu for support and/or to discuss alternatives for training.

Those directly responsible for and connected to cases of sexual misconduct (Title IX Officer, Decision Makers) are trained via Title IX Solutions. The training materials can be found [here](#).

Those directly responsible for and connected to cases of investigating Title IX formal complaints are trained via ATIXA and are outsourced via Robinson & Cole. The training materials can be found here - <https://www.atixa.org/2020-regulations-requirement-posting-of-training-materials/>.

Hartford International University requires ALL INCOMING STUDENTS to complete Title IX training through a power point presentation and quiz through CANVAS New Student Orientation course site. All students must score at least 80% on the accompanying quiz or a registration lock will be placed on their account. Students can re-take the quiz as many times as they need.

Sign Up Now 

TITLE IX: THE INS AND OUTS

MICHAEL P. SANDNER, ESQ.

CHIEF BUSINESS OFFICER

TITLE IX OFFICER

DIRECTOR OF HUMAN RESOURCES

77 SHERMAN STREET; 3RD FLOOR

MSANDNER@HARTFORDINTERNATIONAL.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 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 UNIVERSITY

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



HIU'S COMMITMENT

- HIU'S POLICIES PROHIBIT SEXUAL HARASSMENT OF ANY KIND.
- HIU IS COMMITTED TO PROMOTING A SAFE AND SECURE ACADEMIC ENVIRONMENT FOR ALL MEMBERS OF OUR COMMUNITY.
- HIU 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@HARTFORDINTERNATIONAL.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

- HIU OUTSOURCES OUR INVESTIGATIONS THROUGH ROBINSON & COLE TO PROVIDE IMPARTIAL DISCOVERY.
- 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 UNIVERSITY 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

- HIU MAY CHOOSE TO OFFER AND FACILITATE INFORMAL RESOLUTION OPTIONS, SUCH AS MEDIATION OR RESTORATIVE JUSTICE, IF BOTH PARTIES CONSENT.
- HIU 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 at 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.

Hartford International University For Religion & Peace

Annual Security and Fire Safety Report

**2020, 2021 & 2022 Statistics
Issued Sept. 2023 for the Year 2022**



Hartford International
UNIVERSITY FOR RELIGION & PEACE

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Submitted by:

Paul Gregorio, Director of Facilities and Campus Operations

Michael Sandner, Chief Business Officer, Title IX Officer, Director of Human Resources

Introduction

Hartford International University for Religion & Peace 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 the calendar years 2020, 2021 and 2022. These statistics pertain to crimes reported to have occurred upon the Hartford International University for Religion & Peace'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.hartfordinternational.edu/student-affairs/student-resources/campus-safety>

The Hartford International University for Religion & Peace campus is in the West End of Hartford on twelve acres of land, and includes four office buildings and fifteen residences. Hartford International University for Religion & Peace 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 Facilities and Campus Operations. Issues related to Title IX are coordinated by the Chief Title IX Officer.

Law Enforcement

Hartford International University for Religion & Peace relies on the services of the Hartford Police Department for law enforcement. The Director of Facilities and Campus Operations 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 Facilities and Campus Operations 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 www.hartfordinternational.edu/current-students/student-resources/campus-safety or the Director of Facilities and Campus Operations. 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 Hartford International University for Religion & Peace offices and classrooms. These are distributed to employees; extra copies are on file in the Office of the Director of Facilities and Campus Operations. 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 Facilities and Campus Operations. 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 Hartford International University for Religion & Peace 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 Facilities and Campus Operations' 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 Hartford International University for Religion & Peace and other locations as required for the most recent and two preceding years.

Offense	2020	2021	2022*
Murder - Manslaughter	0	0	
Murder - Negligent Manslaughter	0	0	
Domestic Violence	0	0	
Dating Violence	0	0	
Stalking	0	0	
Sex Offenses - Forcible	0	0	
Sex Offenses - Non-forcible	0	0	
Robbery	0	0	
Larceny	0	2	
Aggravated Assault	0	0	
Burglary	0	0	
Motor Vehicle Theft	1	1	

Arson	0	0	
Hate Crimes	2020	2021	2022*
Race	0	0	
Gender	0	0	
Religion	0	0	
Sexual Orientation	0	0	
Ethnicity	0	0	
National Origin	0	0	
Disability	0	0	
Arrests	2020	2021	2022*
Liquor Law Violations	0	0	
Drug Violations	0	0	
Weapons Violations	0	0	
Disciplinary Referrals	2020	2021	2022*
Liquor Law Violations	0	0	
Drug Violations	0	0	
Weapons Violations	0	0	
*Data for 2022 will be updated by Friday, October 6, 2023.			

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 thefts, shoplifting, and other larcenies occurred in the Farmington Avenue, Girard Avenue and Lorraine Street areas in 2020. While outside of the campus area required for reporting, Hartford International University for Religion & Peace students, staff, faculty, and visitors are advised to be aware of the surroundings and take precautions.

Campus Alerts, Timely Warnings & Emergency Notification

Hartford International University for Religion & Peace 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 International University for Religion & Peace 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 Hartford International University for Religion & Peace 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 Facilities and Campus Operations, 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 decide as time is of the essence. The decision will consider 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

Deena Grant, Vice President of Academic Affairs, Academic Dean

Paul Gregorio, Director of Facilities and Campus Operations

Benjamin Breault, 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 Facilities and Campus Operations 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 intercom system, phone trees, public media announcements, postings on buildings, etc.

Hartford International University for Religion & Peace Policies

Health, safety, and respect for individual differences are priorities for all on the Hartford International University for Religion & Peace 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.

Hartford International University for Religion & Peace is committed to maintaining a healthy campus that supports the integration of a healthy lifestyle of mind, body, and spirit. This policy is informed by our intent to support individuals who have struggled with substance use disorders around alcohol, tobacco, and controlled substances.

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.

Drug-Free Workplace

In accordance with the requirements of the Federal Drug-Free Workplace Act, the Drug-Free Schools and Campuses laws, and national standards for prevention programs, HIU joins with other institutions of higher education to eliminate substance abuse. HIU prohibits:

- The manufacture, distribution, dispensation, possession, use, sale, or solicitation for sale of alcohol, illegal drugs, controlled substances, or prescription medication without a prescription on University premises, at any HIU-sponsored activity or function, while performing work, or while acting on behalf of the University.
- Being impaired or under the influence of alcohol, illegal drugs, controlled substances, or prescription medication in a manner that was not prescribed by the employee's healthcare provider while on University premises, while performing work, or while acting on behalf of the University.

As a condition of employment, all employees must abide by HIU's drug-free workplace policy.

Sanctions

An employee who violates this policy is subject to both HIU's sanctions and to criminal sanctions provided by federal, state, and local law.

Legal Sanctions: The federal Controlled Substances Act places all substances regulated under federal law into one of five schedules based on the substance's medical use, potential for abuse, and safety or dependence liability. The below chart represents a description of federal penalties and sanctions for illegal trafficking and possession of a controlled substance.

FEDERAL TRAFFICKING PENALTIES—

DRUG/SCHEDULE	QUANTITY	PENALTIES	QUANTITY	PENALTIES
Cocaine (Schedule II)	500–4999 grams mixture	First Offense: Not less than 5 yrs, and not more than 40 yrs. If death or serious injury, not less than 20 or more than life. Fine of not more than \$5 million if an individual, \$25 million if not an individual. Second Offense: Not less than 10 yrs, and not more than life. If death or serious injury, life imprisonment. Fine of not more than \$8 million if an individual, \$50 million if not an individual.	5 kgs or more mixture	First Offense: Not less than 10 yrs, and not more than life. If death or serious injury, not less than 20 or more than life. Fine of not more than \$10 million if an individual, \$50 million if not an individual. Second Offense: Not less than 20 yrs, and not more than life. If death or serious injury, life imprisonment. Fine of not more than \$20 million if an individual, \$75 million if not an individual. 2 or More Prior Offenses: Life imprisonment. Fine of not more than \$20 million if an individual, \$75 million if not an individual.
Cocaine Base (Schedule II)	28–279 grams mixture		280 grams or more mixture	
Fentanyl (Schedule II)	40–399 grams mixture		400 grams or more mixture	
Fentanyl Analogue (Schedule I)	10–99 grams mixture		100 grams or more mixture	
Heroin (Schedule I)	100–999 grams mixture		1 kg or more mixture	
LSD (Schedule I)	1–9 grams mixture		10 grams or more mixture	
Methamphetamine	5–49 grams pure or		50 grams or more pure or	
(Schedule II)	50–499 grams mixture		500 grams or more mixture	
PCP (Schedule II)	10–99 grams pure or 100–999 grams mixture		100 gm or more pure or 1 kg or more mixture	

Further, Connecticut law controls the possession and sale of alcohol and controlled substances within the State of Connecticut. Violations of these laws may result in criminal sanctions. Some of the specific laws and criminal sanctions are described below:

- **Alcohol:** Persons under 21 years old may not purchase, attempt to purchase, or make a false statement in connection with the attempted purchase of alcohol. Persons under 21 years old may also not possess alcohol unless accompanied by a parent, guardian or spouse over the age of 21. Fines for violations of these laws can range from \$200–\$500.
- **Marijuana:** Persons under 21 years old may not possess, use, and otherwise consume marijuana. Persons under 18 years old who possess marijuana may be subject to different penalties depending on the nature violation. For example, such persons may receive a written warning, be referred to the youth services bureau, or be adjudicated delinquent. Persons 18 years or older, but under age 21 who possess marijuana may similarly be subject to different penalties depending on the nature of the violation. Such persons will be required to view and sign a statement acknowledging the health effects of cannabis on young people, may be required to pay a fine of \$50, \$150, or \$500 and/or may be found guilty of a class D misdemeanor.
- **Medical Marijuana:** While the use of medical marijuana is permitted under Connecticut law, in accordance with federal law and as a recipient of federal funding, HIU does not permit the possession of medical marijuana on HIU premises or at any HIU-sponsored programs.
- **Other Drugs:** It is a crime to possess or have control over any quantity of any controlled substance (other than marijuana). The statutorily authorized sentences for drug possession range from one-year imprisonment, a \$1,000 fine, or both to up to 25 years imprisonment, a \$250,000 fine, or both.

Employees must, within five calendar days, notify the University in writing if the employee is charged with, arrested for, or convicted of a violation of a criminal drug statute which occurred in the workplace.

HIU Sanctions: HIU will impose corrective action for employees for violations of the standards of conduct as set forth in the section entitled *Drug-Free Workplace*, which may include disciplinary action up to and including immediate termination of employment.

Drug and Alcohol Testing

All prospective employees must pass a drug test as a condition of employment, which includes testing for marijuana. An applicant who tests positive may be rejected for employment with HIU, absent legally-required reasonable accommodation. Pre-employment drug testing includes testing for marijuana and a positive result for marijuana may result in rescission of the job offer or other restrictions; notwithstanding, HIU will review all such results and provide reasonable accommodations for medical marijuana use consistent with its legal obligations.

HIU reserves the right to require drug and alcohol testing for employees whenever the University has a reasonable suspicion that an employee is under the influence of alcohol, illegal drugs, or controlled substances while on the job. HIU will be deemed to have reasonable suspicion if observations of an employee's condition or performance indicate drug or alcohol use that could impair an employee's faculties. Examples include changes in the employee's performance, appearance, behavior, or speech, or involvement in on-the-job accidents or injuries.

HIU also reserves the right to conduct random drug testing. This policy will be read consistent with all state and federal laws and despite the fact that recreational marijuana may be lawful.

HIU will treat drug and alcohol test results as confidential to the extent required by law.

Health Risks Associated with Alcohol and Drug Use

Alcohol: Alcohol consumption causes a number of marked changes in behavior. Even low doses significantly impair the judgment and coordination required to drive a car safely, increasing the likelihood that the driver will be involved in an accident. Low to moderate doses of alcohol also increase the incidence of a variety of aggressive acts, including spouse and child abuse. Moderate to high doses of alcohol cause marked impairments in higher mental functions, severely altering a person's ability to learn and remember information. Very high doses cause respiratory depression and death. If combined with other depressants of the central nervous system, much lower doses of alcohol will produce the effects just described.

Repeated use of alcohol can lead to dependence. Sudden cessation of alcohol intake is likely to produce withdrawal symptoms, including severe anxiety, tremors, hallucinations, and convulsions. Alcohol withdrawal can be life-threatening. Long-term consumption of large quantities of alcohol, particularly when combined with poor nutrition, can also lead to permanent damage to vital organs such as the brain and the liver.

Alcohol consumption during pregnancy increases risk of birth defects. In addition, research indicates that children of alcoholic parents are at greater risk than other children of becoming alcoholics.

Drugs: There are significant health risks associated with the use of controlled substances. The below chart lists the possible effects and health risks associated with the use of some illicit drugs and controlled substances.

Drug	Health Risks
Tobacco	Short term: increased blood pressure, breathing, and heart rate; exposes lungs to a variety of chemicals (vaping also exposes lungs to metallic vapors created by heating the coils in the device)
Cannabis	Short term: slowed reaction time; problems with balance and coordination; increased heart rate and appetite; problems with learning and memory; anxiety Long term: mental health problems, chronic cough, frequent respiratory infections
Opioids	Short term: drowsiness, nausea, constipation, slowed breathing, pregnancy-related issues, death Long-term: increased risk of overdose or addiction if misused
Cocaine	Short term: narrowed blood vessels; enlarged pupils; increased body temperature, heart rate, and blood pressure; headache; abdominal pain and nausea; insomnia, restlessness; anxiety; erratic and violent behavior, panic attacks, paranoia, psychosis; heart rhythm problems, heart attack; stroke, seizure, coma Long term: loss of sense of smell, nosebleeds, nasal damage and trouble swallowing from snorting; infection and death of bowel tissue from decreased blood flow; poor nutrition and weight loss; lung damage from smoking
Hallucinogens	Short term: profound distortions in a person's perceptions of reality; disruption to a person's ability to think and communicate rationally, sometimes resulting in bizarre or dangerous behavior Long term: psychotic-like episodes that can occur long after a person has taken the drug
Stimulants	Short term: increased blood pressure and heart rate; narrowed blood vessels; increased blood sugar; dangerously high body temperature and irregular heartbeat (high doses); seizures (high doses) Long term: heart problems, psychosis, anger, paranoia
Ketamine	Short term: problems with attention, learning, and memory; hallucinations; sedation; confusion; loss of memory; raised blood pressure; unconsciousness; dangerously slowed breathing Long term: ulcers and pain in the bladder; kidney problems; stomach pain; depression; poor memory

Smoking

HIU prohibits smoking, including tobacco and vaping products, in all indoor University spaces, including, but not limited to, classrooms, offices, University-owned residences, and shared living spaces on campus, or any outside area within 50 feet of any doorway, operable window or air intake vent of any campus facility, building or establishment.

Resources Available for Employees

For a list of drug and alcohol programs, including counseling, treatment, rehabilitation, and re-entry visit:

Connecticut – [Department of Mental Services & Addiction Services](#)

Nationwide - [FreeRehabCenters.org](https://www.freerehabcenters.org) For questions regarding the implementation of this policy, employees should contact Human Resources.

Hartford International University for Religion & Peace'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 International University for Religion & Peace 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. Hartford International University for Religion & Peace is currently updating the 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 Facilities and Campus Operations.

Non-medical emergencies and campus crimes should be reported to the Director of Facilities and Campus Operations immediately. After hours, the Resident Assistant and Student Services Manager 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.hartfordinternational.edu/current-students/student-resources/campus-safety> or the Director of Facilities and Campus Operations.

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 International University for Religion & Peace currently has the capacity to house up to 30 residential students. A missing student is defined as any Hartford International University for Religion & Peace student who resides in a housing unit owned by Hartford International University for Religion & Peace 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 International University for Religion & Peace 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 Facilities and Campus Operations upon registering for classes and signature of a housing lease.

If any member of the Hartford International University for Religion & Peace 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 Facilities and Campus Operations 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. Hartford International University for Religion & Peace will cooperate and assist the authorities in all ways prescribed by law.

Sexual Harassment/Violence Policy

Hartford International University for Religion & Peace 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 International University for Religion & Peace.

All Hartford International University for Religion & Peace employees are required to report sexual harassment to the Title IX coordinator. No paid Hartford International University for Religion & Peace 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 Hartford International University for Religion & Peace 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 International University for Religion & Peace may address sexual harassment affecting its students or employees that falls outside Title IX's jurisdiction in any manner Hartford International University for Religion & Peace 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 Hartford International University for Religion & Peace'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@hartfordinternational.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 International University for Religion & Peace utilizes the standard of evidence of "clear and convincing evidence" to determine responsibility. Hartford International University for Religion & Peace 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 International University for Religion & Peace 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 International University for Religion & Peace 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 International University for Religion & Peace 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 Hartford International University for Religion & Peace'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 Hartford International University for Religion & Peace 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.
- Hartford International University for Religion & Peace 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 Hartford International University for Religion & Peace 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.
- Hartford International University for Religion & Peace 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 Hartford International University for Religion & Peace adopts as part of its grievance process for handling formal complaints of sexual harassment must apply equally to both parties.
- Hartford International University for Religion & Peace must follow a formal grievance process before the imposition of any disciplinary sanctions or other actions that are not supportive measures against a respondent. Hartford International University for Religion & Peace may remove any individual from campus immediately without a hearing when an individual's presence poses a safety threat to the campus community. If an individual is removed under this exception, a disciplinary hearing will be held quickly while the removal order is still in effect.

- Hartford International University for Religion & Peace must not restrict the rights protected under the US Constitution, including the First Amendment, Fifth Amendment, and Fourteenth Amendment, when complying with Title IX. Hartford International University for Religion & Peace 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 Hartford International University for Religion & Peace's education program or activity against a person in the United States, Hartford International University for Religion & Peace must dismiss such allegations for purposes of Title IX. Hartford International University for Religion & Peace may still address the allegations in any manner the school deems appropriate under the school's own code of conduct.
- Hartford International University for Religion & Peace 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.
- Hartford International University for Religion & Peace 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 – Hartford International University for Religion & Peace 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 Hartford International University for Religion & Peace, not on the parties. Investigators may not be the school's Title IX Officer.

- Hartford International University for Religion & Peace must provide equal opportunity for the parties to present fact and expert witnesses and other inculpatory and exculpatory evidence during the investigation process.
- Hartford International University for Religion & Peace will not restrict the ability of the parties to discuss the allegations or gather evidence.

- Hartford International University for Religion & Peace 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.
- Hartford International University for Religion & Peace must send written notice to each party of any investigative interviews, meetings, or hearings.
- Hartford International University for Religion & Peace 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.
- Hartford International University for Religion & Peace 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.
- Hartford International University for Religion & Peace 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 Hartford International University for Religion & Peace deems appropriate.
- A complainant can withdraw the formal complaint and allegation as long as the party gives voluntary, informed, written consent to do so.
- Hartford International University for Religion & Peace 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.
- Hartford International University for Religion & Peace must give the parties written notice of a dismissal (mandatory or discretionary) and the reasons for the dismissal.
- Hartford International University for Religion & Peace may, in its discretion, consolidate formal complaints where the allegations arise out of the same facts.
- To protect the privacy of each party, Hartford International University for Religion & Peace 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

- Hartford International University for Religion & Peace, 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 Hartford International University for Religion & Peace 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

- Hartford International University for Religion & Peace 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 International University for Religion & Peace must create an audio or audiovisual recording, or transcript, of any live hearing.
- Hartford International University for Religion & Peace 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 Hartford International University for Religion & Peace

Appeals Process

- Hartford International University for Religion & Peace 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

- Hartford International University for Religion & Peace expressly prohibits retaliation against any person for reporting any conduct under this policy or participating in any investigation or proceeding.
- Hartford International University for Religion & Peace 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 during 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 Hartford International University for Religion & Peace'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, Hartford International University for Religion & Peace 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 Hartford International University for Religion & Peace 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.)

Hartford International University for Religion & Peace 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 Student Services Manager 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 (Español) 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)

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 Hartford International University for Religion & Peace employee conditioning an individual's instruction, employment, or participation in Hartford International University for Religion & Peace activities upon submission to unwelcome sexual conduct and/or a Hartford International University for Religion & Peace 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. A 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 International University for Religion & Peace employees are required to report sexual harassment to the Title IX Coordinator. No paid Hartford International University for Religion & Peace 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 Hartford International University for Religion & Peace 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 Facilities and Campus Operations 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 Hartford International University for Religion & Peace 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 there is a 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) 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 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 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 Facilities and Campus Operations 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 detect 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 Facilities and Campus Operations 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.hartfordinternational.edu/current-students/student-resources/campus-safety>