SUFFOLK UNIVERSITY
BOSTON

Annual Security & Fire Safety Report 2026

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A MESSAGE FROM THE CHIEF OF POLICE

Dear Students, Faculty, Staff, and Guests:

Welcome to Suffolk University and the City of Boston!

Suffolk University provides students with unlimited opportunities, and we know that Suffolk University allows students to experience the best Boston has to offer. We urge all members of our campus community to keep their safety in mind while living and learning in this world-class city.

The members of the Suffolk University Police & Security Department are committed to providing the highest quality of police and security services to the Suffolk University community. We work in partnership with the entire community to ensure a safe living and learning environment in which our faculty and staff may best support students in their efforts to achieve academic success.

On behalf of the members of the Suffolk University Police & Security Department, I am pleased to present the 2025 Suffolk University Annual Security and Fire Safety Report. This report offers important information about the University, including:

- Crime statistics
- Fire statistics
- Emergency and crime reporting procedures
- Missing persons policies and procedures
- Access to campus facilities
- Drug and alcohol policies
- Sexual assault policies and reporting procedures
- Anti Hazing Policy & Reporting
- Crime prevention programs
- Fire safety systems and policies

The information provided in this report is designed to inform the Suffolk University community and to ensure that its members are aware of the safety issues that affect our urban campus. Your safety and well-being are our top priorities, and the University takes pride in maintaining an effective public safety program. Please keep in mind, however, that even the best public safety system will fall short without your continued cooperation and commitment to your own safety and the safety of others. You can help us by taking steps to protect yourself and your property, and by reporting suspicious activities and crimes you may observe. Together, we will provide a safe and secure campus environment.

Thank you for your support and for taking the time to read this report. As always, we welcome your comments or suggestions.

Respectfully,

Jeffrey Silva
Chief of Police & Director of Public Safety

THE CLERY ACT

The Jeanne Clery Campus Safety Act (the "Clery Act") mandates that colleges and universities:

- Publish an annual security and fire safety report by October 1st that includes the past three years of campus crime and fire safety statistics, campus security policies and procedures, and information regarding programs available to educate the University community on safety and crime prevention.
- Report statistics for crimes that occur on campus, in non-campus buildings or property, and on public property that is within the campus or immediately adjacent to and accessible from the campus.
- Report on fire statistics for each on-campus student housing facility.
- Provide timely warning notices of Clery crimes that are considered to represent a threat to students and employees.
- Establish and implement emergency notification procedures in the event of emergencies occurring on campus that pose an immediate threat to the health or safety of students or employees.
- Maintain a public, written crime log that records crimes reported to campus police that occur on campus, in non-campus buildings or property, or on public property that is within the campus or immediately adjacent to and accessible from the campus.
- Maintain a public fire log that records any fire that occurred in an on-campus student housing facility.
- Establish policies and procedures relating to campus security and fire safety.

THE SUFFOLK UNIVERSITY POLICE & SECURITY DEPARTMENT

About the Suffolk University Police & Security Department

Campus safety is a priority at Suffolk University. The Suffolk University Police & Security Department (SUPD) works diligently to maintain a safe and secure campus for all students, faculty, staff, and visitors.

The SUPD reports to the Suffolk University Chief Operating Officer and includes 32 allotted sworn police officers, 38 allotted security officers, 5 allotted civilian dispatchers, one (1) civilian employee, and student security officers. Department staffing includes an Investigations Unit comprised of a Captain and a Detective/Crime Prevention Officer. The Department provides campus safety and security services to the Suffolk University community 24 hours a day, 7 days a week, and 365 days a year. Suffolk University police officers are appointed pursuant to Chapter 22C, Section 63, of the Massachusetts General Laws and have full arrest powers as do municipal or state police officers regarding crimes occurring on lands or structures owned, used, or occupied by Suffolk University. As of July 1, 2021, Suffolk University Police Officers are also certified under the Massachusetts Peace Officer Standards and Training Commission (POST). Suffolk University security officers do not have arrest powers but are authorized to enforce University policies and assist Suffolk University police officers.

Suffolk University police officers wear dark blue shirts, have a Suffolk University Police badge, and wear the seal of the Commonwealth of Massachusetts on their collar. SUPD officers carry a firearm, a baton, and Oleoresin Capsicum ("pepper") spray. Suffolk University security officers wear light blue shirts and have a Suffolk University Security badge. Suffolk University Police officers have full police powers to include the right of arrest. Security Officers do not carry weapons or Oleoresin Capsicum spray and do not have police powers.

Suffolk University police officers patrol the campus in marked police cruisers, on foot, and by bicycle. The SUPD main office is located at 148 Cambridge Street, 4th floor, and the SUPD dispatch center is located at Sargent Hall, 120 Tremont Street, on the parking garage level. The dispatch center is staffed 24 hours a day, 7 days a week, 365 days a year.

Local Law Enforcement Agencies

The SUPD maintains a close working relationship with the Boston Police Department. The University has entered into a Memorandum of Understanding with the Boston Police Department under which the Boston Police Department has agreed to deploy personnel to provide services in and around the Downtown Crossing area, Beacon Hill and the North End sections of Boston, on Thursday, Friday, and Saturday nights during the academic year.

Apart from the services addressed in the Memorandum of Understanding, the University provides a Suffolk University Police Officer as available as liaison to the Boston Police Department to assist Boston Police patrols on weekend nights in the North End section of Boston where there are a high percentage of Suffolk University students living in off-campus housing.

Members of the SUPD Command Staff attend monthly community meetings hosted by the commanding officer of the Boston Police Department Area A-1 Station to exchange information and to address community concerns.

The Suffolk University Police and Security Department also works closely with other federal, state and local police agencies including the Massachusetts State Police, the MBTA Police, the Boston Park Rangers, and other law enforcement agencies. The SUPD is a member of the Boston Area Police Emergency Radio Network (BAPERN), which allows the SUPD to communicate with local law enforcement agencies through the police radio system.

Preparation of Annual Crime and Fire Statistics

The SUPD prepares the Annual Security and Fire Safety Report and discloses the annual crime and fire statistics to comply with the Clery Act. The crime, arrest, and disciplinary referral statistics on campus, in non-campus buildings or property, or on public property include those reported to the SUPD, campus security authorities, and partner local law enforcement agencies.

The SUPD also obtains information from local law enforcement regarding the occurrence of crimes on public property within the campus or immediately adjacent to, and accessible from the campus. The SUPD collects statistics and compiles them in accordance with the Clery Act.

On or before October 1st each year, SUPD sends an email notification containing the Web address

to access the Annual Security and Fire Safety Report to all employees and enrolled students. Copies of this report may also be obtained at SUPD, located at 148 Cambridge Street, Boston, MA. All prospective employees may access this report online or obtain a copy from the Human Resources Office, located at 73 Tremont Street, Boston, MA. All prospective students may access this report online or obtain a copy from the Office of Undergraduate Admissions or the Office of Graduate Admissions, both located at 73 Tremont Street, Boston, MA, or the Law School Admissions Office, located at 120 Tremont Street, Boston, MA.

Daily Crime Log

SUPD compiles a daily crime log that contains records of all criminal incidents and alleged criminal incidents that are reported to SUPD. The records include the date the crime was reported[1], the date and time the crime occurred, the nature of the crime, the general location of the crime and the disposition of the complaint, if known. The crime log for the most recent 60-day period is open to public inspection, upon request, during normal business hours. The crime log is in the SUPD administrative offices on the 4th floor of the Ridgeway building, 148 Cambridge Street, Boston, MA. Any portion of the crime log that is older than 60 days will be available within two (2) business days of a request for public inspection.

EMERGENCIES, CRIME REPORTING, AND RESPONSE

Reporting Criminal Activity or other Emergencies Occurring on Campus

Suffolk University students, faculty, staff, and visitors, who are victims of, observe, or have knowledge of any criminal act, emergency, or public safety incident, should immediately contact the SUPD.

Crimes and emergencies can be reported by calling 617-573-8111 or extension 8111 on campus. Non-emergency security or public safety related matters can be reported to the SUPD by calling 617-573-8333 or extension 8333 on campus.

A person reporting criminal activity or other emergencies to the Suffolk University Police & Security Department may also report criminal activity or other emergencies to the **Boston Police Department** by **calling 911**. The University will assist the reporting party with contacting local law enforcement if the reporting party wishes and will provide the reporting party with contact information for local law enforcement.

Emergency Call Boxes

Suffolk University maintains emergency call boxes and intercom call boxes located throughout the campus - on the exterior of buildings, inside building and inside elevators. Community members can dial directly to the Suffolk University Police & Security Department and other campus extensions from these call boxes.

Suffolk University community members are encouraged to report all crimes, emergencies, and

[1] Crimes are listed in the crime log in the order in which they were reported to the SUPD.

public safety incidents to the SUPD in a timely manner. SUPD dispatchers are available 24 hours a day, 7 days a week, 365 days a year, to answer telephone calls and calls from emergency call boxes.

The SUPD will respond to all reported incidents, emergencies, and crimes on campus, and officers will prepare an incident report. Upon preparation of an incident report, the SUPD may provide the report to either the applicable Dean of Students or the Human Resources Office, depending on the parties involved.

Pastoral and Professional Counselors

When acting in their official capacity, pastoral and professional counselors are not required to report crimes for inclusion in the annual disclosure of crime statistics under 20 U.S.C. Section 1092(f). A pastoral counselor is a person who is associated with a religious order or denomination, recognized by that religious order, or denomination as someone who provides confidential counseling, and functions within the scope of that recognition as a pastoral counselor. A professional counselor is a person whose official responsibilities include providing mental health counseling to members of the Suffolk community and who functions within the scope of his or her license or certification.

Timely Warnings

Suffolk University will issue a campus-wide "timely warning" or crime alert for any Clery Act crime that occurs in the Suffolk University Clery geography, that, in the judgment of the Chief of the SUPD, or their designee, constitutes a serious or continuing threat to students and employees. Suffolk University will also issue a crime alert for other crimes that occur on or off campus that constitute a serious or continuing threat to students and employees.

Depending on the circumstances of the crime, the University will utilize some or all of the following methods to communicate the warning: the University emergency messaging system (RaveAlert), which allows the University to send notifications through text messaging, email, voice message/voicemail, RSS, social media, or any combination of the above. The University may also use postings on university website(s), campus newspaper notices, media announcements, flyers, postings on bulletin boards in residence halls, in lobbies of academic buildings and other University buildings, and/or on-campus televisions to communicate emergency notifications and alerts. The Vice President of Marketing and Communications or designee will assist with determining the method(s) of communications to be used.

We urge anyone with information warranting a timely warning to report the circumstances to Suffolk University Police & Security Department by telephone (617-573-8111), or in person to a police or security officer.

Timely Warnings shall be provided to students and employees in a manner that is timely, that withholds as confidential the names and other identifying information of victims, and that will aid in the prevention of similar occurrences.

Emergency Notification Procedures

In the event of a significant emergency or dangerous situation involving an immediate threat to the health or safety of students or employees occurring on the Suffolk University campus, the University will issue an emergency notification and activate its emergency notification procedures. The University uses RaveAlert, which allows the University to send emergency notifications through email, voicemail, text messaging, social media, or any combination of the above. In addition, the University may use the **Suffolk University website** home page, social media, bulletin boards, and on-campus televisions to communicate emergency notifications.

The University makes its Emergency Action Plan available to all employees through the webpage. In addition, floor evacuation diagrams showing evacuation routes are posted on each floor of all campus facilities.

Procedures for Significant Emergencies or Dangerous Situations

The University's emergency notification procedures are initiated upon a confirmation of a significant emergency or dangerous situation involving an immediate threat to the health or safety of students or employees occurring on the Suffolk campus. The emergency is promptly confirmed through the following steps:

- SUPD police officers verify the report, if appropriate.
- The Chief of the SUPD or designee notifies the Director of Emergency Management (or in the Emergency Manager's absence, the Associate VP of Campus Experience) and the Vice President of Communications or designee who assess the situation (collectively, the "Notification Team"). The Notification Team may consult with other members of the Emergency Management Group as determined by the Notification Team and activate the emergency notification system.
- In exceptional circumstances, the Chief of the SUPD (or if s/he is not available the SUPD supervisor on duty) may assess the situation and determine that, based upon the exigency of the situation, there is insufficient time to consult with other members of the Notification Team prior to activating the emergency notification system. To the extent that time permits, the Chief of the SUPD (or if s/he is not available, the SUPD supervisor on duty) will consult with the Director of Emergency Management (or, if s/he is not available, the Risk Manager) before activating the emergency notification system. Additionally, the Chief of the SUPD or if s/he is not available, the SUPD supervisor on duty, will also consult with the Vice President of Communications. In the event that the emergency notification system is activated without consultation with either or both the Director of Emergency Management or the Vice President of Communications, the SUPD will notify them upon activation of the emergency notification system.

- Either prior to or upon activation of the emergency notification system, the Director of Emergency Management (or in his/her absence, the Associate VP of Campus Experience) notifies the Emergency Management Group, which further assesses the situation and determines what additional appropriate actions may be necessary, including issuing further emergency notifications.

Notification

Once a significant emergency or dangerous situation is confirmed as described above, the Notification Team will determine the appropriate segment or segments of the community to receive a notification, depending on the nature and extent of the threat or danger.

The Notification Team will, without delay and considering the safety of the community, determine the content of the emergency notification and initiate the notification system, unless issuing a notification will, in the professional judgment of the Notification Team, compromise efforts to assist a victim or to contain, respond to, or otherwise mitigate the emergency.

Such reports shall be provided to students and employees in a manner that is timely, that withholds as confidential the names and other identifying information of victims, and that will aid in the prevention of similar occurrences.

Disseminating Emergency Information to the Larger Community

The Office of Public Affairs, in consultation with the President and University Counsel, is responsible for communicating with the larger community, including both internal and external constituencies. The Office of Public Affairs will provide ongoing communication with media, trustees, all employees, students, alumni, parents, and the public. Public Affairs may communicate through various channels, including campus-wide emails, the **Suffolk University website** home page, press releases, press conferences, or social media.

Annual Testing of Emergency Response and Evacuation Procedures

The Director of Emergency Management annually tests the emergency response and evacuation procedures in each residential building. All evacuation drills are generally unannounced. The Director of Emergency Management documents the date and time of each drill, along with a description of the exercise.

MISSING STUDENTS

College of Arts and Sciences (CAS) and the Sawyer Business School (SBS)

Employees, students, or other individuals who have concerns that a student may be missing should report these concerns to the Suffolk University Police (SUPD) at ***617-573-8111***.

A student may be deemed missing if it is reported to appropriate University officials that the student has been unreachable via personal contact, telephone, email, or other means of electronic communication for 24 hours or longer. Appropriate University officials include the SUPD, resident assistants (RAs), Residence Life and Housing staff, Student Affairs staff, and International Student Services staff.

RAs are required to inform their supervisors immediately upon receiving a missing student report.

Residence Life staff, Student Affairs staff, and International Student Services staff will immediately report notification of a missing student to the SUPD. The SUPD will immediately inform the Office of Emergency Management and Student Affairs of the report of a missing student.

The SUPD will investigate in conjunction with appropriate University staff members to help determine whether the student is missing. In circumstances involving non-resident students, SUPD may approach local city and town police about performing a wellbeing check at the student's address of record.

The Suffolk University Police and Security Department complies with Public Law 108-21, Title II, Section 204, which is more commonly known as "Suzanne's Law." This law amends Section 3701(a) of the Crime Control Act of 1990 (42 U.S.C. 5779(A)), so that there is no waiting period before a law enforcement agency initiates an investigation of a missing person under the age of 21 and reports the missing person to the National Crime Information Center (NCIC) of the Department of Justice. "Suzanne's Law" is named after Suzanne Lyall, a State University of New York at Albany student who has been missing since 1998. Previously, police were only mandated to report missing persons under the age of 18. This law, which was signed by President Bush as part of the national "Amber Alert" bill on April 30, 2003, requires police to initiate prompt investigations into missing young people

If it is determined by the SUPD that a student has been missing for longer than 24 hours, then, within the next 24 hours, the Student Affairs Office will notify the individual identified by the student as the designated emergency contact that the student has been reported missing. Students have the option to identify a contact person or persons whom Student Affairs shall notify under such circumstances. This contact information will be registered confidentially and will only be accessible to "appropriate University officials" as described above, except that the contact information will be disclosed to law enforcement personnel in furtherance of a missing person investigation. In addition to notifying any contact person designated by the student, if a student is under 18 years of age and not emancipated, the Student Affairs Office must notify a custodial parent or guardian within 24 hours of the determination that the student is missing.

Once it has been established that a Suffolk University student is missing, the Office of Public Affairs should be notified immediately. The Office of Public Affairs will work with the appropriate University administrator(s) to determine how to communicate with the press, the public, and the internal community about the developing situation.

The SUPD will also notify local law enforcement within 24 hours of the determination that a student is missing, unless the local law enforcement agency was the entity that made the determination that the student is missing.

Suffolk University Law School

Concerns regarding a law school student who is unreachable or missing should be referred to the Law School Dean of Students Office. Upon receipt of such a concern, the dean of students will determine an appropriate course of action on a case-by-case basis, balancing the privacy of adult students with legitimate concerns for safety and well-being. The Dean of Students Office may

contact the student directly, inform the University Police, communicate with the emergency contact provided by the student, or take other appropriate action. Any such response will occur within a reasonable time of receipt of the report and applicable student privacy laws will govern communications regarding the law student.

Absent additional facts or circumstances, the failure of a law student to attend class, participate in school activities, or respond to communications from Law School personnel, will not result in the Law School acting under this policy.

ACCESS TO CAMPUS FACILITIES

Suffolk University allows members of the Suffolk community to move freely among campus facilities. The SUPD monitors access to campus facilities through police patrols, manned security desks, and closed-circuit televisions (CCTVs) at various locations. Suffolk University facilities are not open to the public, unless there is a function or other event on campus that is open to the public, and all buildings are posted with the following notice: "*No trespassing. ID cards must be shown upon request*."

Certain buildings on campus have additional security measures in place. Suffolk does not maintain or recognize off-campus student organization locations or student organization off-campus housing facilities.

All employees and students are required to carry their Suffolk University issued photo ID card at all times for the purposes of maintaining security and gaining access to libraries, computing, and other facilities.

Special Security for Residence Halls

SUPD provides 24-hour access control to the undergraduate residence halls at 150 Tremont Street, 10 West Street/Modern Theater, 10 Somerset Street, 1 Court Street, and 101 Tremont Street. Suffolk University police and security officers are assigned to monitor the front lobby of each residence hall, and the building entrances are monitored through CCTVs. Access control is supplemented by a card access system, which is linked to the student ID cards, and requires all students to swipe or tap a card before entering. Visitors must present a valid photo ID, which is scanned into a computer system, and must be signed in at the security desk of the student's respective residence hall. In addition, all visitors are required to always be in the presence of their Suffolk host. Periodically, the University acquires space in off-campus hotels, or other locations, for temporary student housing in which the security is determined by property management.

Maintenance of Campus Facilities

Suffolk University's Department of Facilities is responsible for proper repair and maintenance of campus facilities. The SUPD reports to the Department of Facilities any maintenance or repair issues it might observe while patrolling campus facilities, including such conditions that may pose a safety risk to the community.

ALCOHOL AND DRUG POLICIES

Suffolk University requires that all faculty, students, staff, and guests observe all federal, state, and local laws as well as University policies pertaining to alcoholic beverages, illegal drugs, and controlled substances. It is the responsibility of all members of the University community to be familiar with, and to comply with applicable laws.

Alcohol and Drug Policy for College of Arts & Sciences and Sawyer Business School Students

Suffolk University is a community dedicated to the academic, professional, social, cultural, and intellectual development of its members, and is committed to educational and social programs that promote such development. Personal and communal responsibility with regard to the University's Student Alcohol and Drug Policy is essential in ensuring that Suffolk's environment is conducive to student learning and development. Being under the influence of alcohol or drugs will not be accepted as an excuse for conduct that violates the Community Standards. Any student found to allegedly violate this policy will be subject to the Student Conduct System.

General Provisions

Suffolk University enforces all federal and state laws, and city ordinances regarding the possession, use, and sale of alcoholic beverages, including those prohibiting drinking by individuals under 21 years of age. The law also forbids falsifying age and identification cards. Suffolk University enforces all federal and state laws, and city ordinances regarding the possession, use, and sale of illegal drugs and drug paraphernalia. Where federal and state laws and city ordinances may conflict, federal law is enforced.

Student Alcohol Policy (CAS & SBS)

Unless otherwise permitted by the policy on **Alcohol Use and Marijuana Prohibition Policy for University Events** or for students over 21 years of age living in a *Designated Legal Consumption Residence (DLCR)*, all students and guests of a student are prohibited from using, being in the presence of, selling, transferring, or possessing alcoholic beverages in any campus building or property controlled by the University or as any part of a University-sponsored activity.

All students, regardless of age, are prohibited from engaging in drinking games or drinking contests in any form in any campus building or property controlled by the University or as any part of a university-sponsored activity.

Alcohol advertisements and signage are not permitted in any campus building or property controlled by the University (including residence halls or leased residential properties). Materials and social media posts must not encourage any form of alcohol abuse or place any emphasis on quantity and frequency of use. The consumption of alcoholic beverages must not be portrayed in any materials or social media posts as the focus of any function. Alcohol may not be portrayed as a solution to personal or academic problems, or as necessary for social, sexual, or academic success.

Persons and their belongings will be subject to search by Suffolk University Police if they are suspected of bringing alcohol, in violation of university policy, into any campus building or property controlled by the University (including residence halls or leased residential properties) or of being under the influence of alcohol, and may not be allowed into the building or property with a suspected package.

Students are strongly encouraged to call for medical assistance (On-campus call: 617-573-8111; Off- campus call 911) for themselves or for another student whom they believe is dangerously intoxicated or is experiencing medical issues because s/he is under the influence of alcohol and/or drugs. See the **Medical Amnesty Policy.**

Prohibited Items

- Alcohol beverage containers (empty, full, or decorative), including, but not limited to, shot glasses or beer steins, unless stored or used in accordance with policy in a Designated Legal Consumption Residence.
- Drinking game devices, funnels, and alcohol bladders.
- "Common Carriers" including, but not limited to, kegs, beer balls, containers of "BORG," and trash can punch.
- Other items if University staff determine, in their reasonable discretion, that the items are being used or displayed in violation of the Alcohol Policy.

Designated Legal Consumption Residences

The University may assign Designated Legal Consumption Residence (DLCR) status to residential spaces in which all of the residents in those spaces are over the age of 21 and are enrolled in the Law School (JD, LLM, or SJD) or CAS/SBS Graduate programs. In doing so, the University may designate rooms, floors or entire residence halls as a DLCR. Notice of this designation will be made by the Office of Residential Life & Housing.

The University may designate as a DLCR spaces that includes other students who are over the age of 21, provided that the space is occupied by a majority of law and graduate students.

The University reserves the right to revoke the DLCR designation at any time, whether or not such revocation is related to violation of university policy by those residing in the DLCR. The University also reserves the right to decline the DLCR designation even if residents are over the age of 21 and have not violated University policy.

All residents of the DLCR must complete mandatory alcohol awareness training, even if they are in the Law or Graduate programs. Failure of all students in the designated space to complete the training will result in revocation of the DLCR designation, even if some residents within the space have completed the training.

In DLCR-designated areas, persons 21 years of age and over may possess or use alcohol in the privacy of their residence hall rooms provided that:

1. All people in the DLCR-designated residence hall room or space are 21 years of age or older, AND
2. All University policies are followed, including, but not limited, to those governing guests, “common carrier” restrictions, hazing, and noise.

People under the age of 21 years may not be in a residence hall room or space where alcoholic beverages are contained and/or are being consumed. Students under the age of 21 who may have visitors 21 years of age or older are not allowed to have alcohol in their room based on the guest’s age; students 21 years of age or older may not have alcohol in their room with underage guests.

Regardless of DLCR designation, alcoholic beverages are not permitted in any public areas including, but not limited to, residential hallways, lounges, stairwells, and lobbies.

Students, guests and spaces remain subject to all policy enforcement actions by the University, including necessary searches and confiscations, regardless of DLCR designation.

DLCR-designated Apartment-Style spaces

DLCR-designated apartment-style spaces are subject to the DLCR policies. In addition, the following applies to DLCR-designated apartment-style spaces:

- Within an individual apartment, if all assigned residents are 21 or older, alcohol may be kept anywhere in the apartment, including the common area refrigerator.
- Within an individual apartment, if all assigned residents are not 21 or older, alcohol may not be kept in the common areas, including the common refrigerator. However, within an individual apartment, if all assigned residents of a bedroom are 21 or older, alcohol may be kept in that bedroom.
- Within an individual apartment, alcohol may be consumed in the common area if EVERYONE PRESENT IS 21 OR OLDER. For these purposes, the definition of "present" will include all people who are in the apartment, whether in the common area or the individual bedrooms or bathrooms, at the time that the alcohol is being consumed.
- Within an individual apartment, alcohol may be consumed within the privacy of a bedroom if everyone present in that room is 21 or older.

Enforcement of Alcohol Policy in University-Sponsored Housing

While the University respects the privacy of student rooms, that privacy is conditional. Staff may respond and take appropriate action if and when students or their guests create a disturbance, become a nuisance, or appear to present a danger to themselves or others. If a staff member has reasonable cause to suspect a violation of the alcohol policy, they may inspect all bags, etc. that enter University property; confiscate all alcoholic beverages, cans, and bottles; make searches of rooms including without limitation, refrigerators; and take the steps necessary to enforce the alcohol policy. Students will be held responsible for any infractions that occur in their rooms and may be held collectively accountable for infractions that occur in common areas of the residence hall or campus where the students are present. Students will be held responsible for the actions of their guests. The enforcement described within this paragraph applies to all University-sponsored

housing, regardless of whether a space is designated as a DLCR.

Student Drug Policy (CAS & SBS)

All students and guests of a student are prohibited from possessing, using, consuming, manufacturing, selling or distributing illegal drugs as defined under federal or Massachusetts law – which includes marijuana, being intoxicated as the result of using such illegal drugs, or being in the presence of illegal drugs or marijuana in any campus building or property controlled by the University (including residence halls or leased residential properties) or in connection with any University-sponsored event.

Marijuana: On November 8, 2016, Massachusetts became the fifth state to vote to legalize the recreational use of marijuana. However, marijuana remains a Schedule I Controlled Substance, and possession of marijuana therefore remains illegal, under Federal law. Therefore, Suffolk University's policy remains unchanged: **the possession, use, consumption, transfer, manufacturing, sale or distribution of drugs, including marijuana, by students or guests of a student is prohibited.** The policy complies with the requirements of the federal Drug-Free Schools and Communities Act. Under this federal law, as a condition of receiving federal funds, an institution of higher education such as Suffolk University must certify that it has adopted and implemented a program to prevent the unlawful possession, use or distribution of illicit drugs and alcohol by students and employees on campus and as part of its activities and programs. Under federal law, this includes any amount of marijuana.

Drug paraphernalia is also prohibited in any campus building or property controlled by the University (including residence halls or leased residential properties). Drug paraphernalia is defined as any equipment, product, material and/or ingredients that is/are used or modified for making, using, or concealing illegal drugs, including, but not limited to, pipes, smoking masks/screens, bongs, hookahs, vape pens or roach clips. Certain scales, grinders, vials, and baggies may also be considered drug paraphernalia.

Students are not permitted to use, sell, transfer, or possess medication prescribed to another person or sell, or transfer their own medication to another person.

Persons and their belongings will be subject to search by Suffolk University Police if they are suspected of bringing illegal drugs into any campus building or property controlled by the University (including residence halls or leased residential properties) or of being under the influence of illegal drugs, and may not be allowed into the building or property with the suspected package.

Students are strongly encouraged to call for medical assistance (On-campus call: 617-573-8111; Off- campus call 911) for themselves or for another student whom they believe is dangerously intoxicated or is experiencing medical issues because they are under the influence of alcohol and/or drugs. See the **Medical Amnesty Policy.**

Student Sanctions for Alcohol and Drug Violations

Students are required to review and abide by the University's policies on alcohol and other drugs.

Often, students ask what the sanctions are for violating the Student Alcohol and Drug Policy. Sanctions are often a combination of educational and punitive sanctions with the goal being that the University first strives to educate students about acceptable behavior while also holding students accountable for their misconduct. In determining sanctions, the following may be considered: a student's present demeanor, past disciplinary record, the nature of the misconduct, and the severity of any damage, injury or harm resulting from the misconduct or other factors.

If found responsible for violating alcohol and drug policies, a non-resident student may lose residence hall visitation privileges. Guests who are not Suffolk University students and who violate any University policy while visiting University housing may lose visitation privileges permanently.

Only in an environment free of substance abuse can Suffolk University fulfill its mission of developing the professional, social, cultural and intellectual potential of each member of its community.

Study Abroad Notice

Students participating in study abroad or travel programs must abide by local laws regarding alcohol and drug use. Inappropriate student conduct while participating in study abroad or travel programs, including but not limited to intoxication, providing alcohol to others, etc. may result in disciplinary action.

Professional Live-on Staff

Professional live-on staff are those employees residing in university-sponsored housing whose primary relationship with the University is employment. The residences of professional live-on staff are not subject to the Student Alcohol Policy.

Medical Amnesty Policy for Students in the College of Arts & Sciences and Sawyer Business School

Students seeking emergency treatment for alcohol and/or drug-related medical emergency will not be subject to university disciplinary action for the sole violation of using alcohol or other drugs. This policy shall extend to a student seeking help for another student.

In situations of medical emergencies caused by alcohol and/or drug use, the primary concern is the health and safety of the individual(s) involved. Students are strongly encouraged to call for medical assistance (On-campus call: 617- 573-8111; Off-campus call 911) for themselves or for another student whom they believe is dangerously intoxicated or is experiencing medical issues because s/he is under the influence of alcohol and/or drugs.

Students experiencing an alcohol and/or drug-related medical emergency may receive medical amnesty through the Suffolk University Student Conduct System when students or their friends or other persons (not University staff) are concerned about them and seek medical assistance from SUPD or Residence Life & Housing staff (or from local police if off-campus). Medical amnesty may be extended to students who seek help from SUPD or Residence Life & Housing staff (or from local police if off campus) for another student provided they remain with the student experiencing the medical emergency until medical assistance arrives. Medical amnesty applies to the use of alcohol and/or drugs and does not extend to other violations of the Community Standards including, but not limited to, distribution of alcohol or drugs, vandalism or assault. Students granted medical amnesty may be required to complete educational or other sanctions. The University reserves the right to inform parents/guardians when students receive medical amnesty.

Students whose pattern of behavior suggests the ongoing use of alcohol and/or drugs may not be granted medical amnesty.

Survivors of alleged violations of the Title IX / Nondiscrimination Policy
who are alleged to have violated the Student Alcohol and Drug Policy at the time of the sexual misconduct incident may be granted amnesty for their use of alcohol or illegal drugs.

Only in an environment free of substance abuse can Suffolk University fulfill its mission of developing the professional, social, cultural, and intellectual potential of each member of its community.

Students are required to review and abide by the University's policies on alcohol and other drugs.

Alcohol Use and Marijuana Prohibition Policy for University Events

Suffolk University is a community dedicated to the academic, professional, social, cultural and intellectual development of its members and is committed to educational and social programs that promote such development. Personal and communal responsibility with regard to the University's alcohol and other drug policies is essential in ensuring that Suffolk's environment is conducive to student learning and development. Being under the influence of alcohol or drugs will not be accepted as an excuse for conduct that violates the Community Standards or other University policies. Those believed to have violated this policy will be referred to the Student Conduct System (CAS & SBS students), the Law School Student Disciplinary Procedure (Law Students) or Human Resources (Employees).

Suffolk University requires the observance of all laws and regulations that pertain to alcoholic beverages and other controlled substances as outlined in federal, state and municipal laws. It is the responsibility of all members of the University community to be familiar with and to comply with these laws.

No marijuana products may be served or used at university events (see the University's Drug-Free Schools and Communities Act - Student Notification).

University Regulations for Events with Alcohol

The regulations for use of alcoholic beverages at programs and events sponsored at the University and/or by university departments and organizations are designed to allow for the responsible use of alcoholic beverages while providing safeguards for the University and its faculty, staff and students.

Scope of this policy:

This policy applies to events held on the Boston campus of Suffolk University and certain university events held off-campus events as defined below.

Definitions:

A university event shall mean any gathering sponsored by university offices, departments or organizations using university funds (including those derived by student activity fees) and/or purporting to represent the normal functions of the university, including but not limited to academic for a, student recruitment, advancement, and student life.

On-campus shall mean any building or open space owned or leased by Suffolk University.

Off-campus shall mean venues or spaces not otherwise owned or leased by Suffolk University.

1. Registration of Events

All on-campus University events with alcohol must be registered as follows:

- With the exception of events sponsored by student organizations in the Law School, all events with alcohol shall be registered through the University Conference and Events Office as part of the process for obtaining alcohol through the University's caterer as required in section 6, below.
- Events Sponsored by student organizations in the law school must be approved by, and registered with, the Law School Dean of Students Office via the Alcohol Registration Form.
- Additional registration may be required as determined by applicable University offices.

Registration of events is required on the following schedule:

- Events where alcohol is served but not sold - 3 days in advance

- Events where alcohol is sold - 14 days in advance.

The University Conference and Events office, or the Law School Dean of Students Office, as appropriate, shall inform SUPD of all registered events with alcohol.

2. Staffing Requirements for Events

All on-campus University Events with alcohol must be staffed by the University caterer. In addition, all events sponsored by student groups where alcoholic beverages are served or sold **must have a designated host** who is considered the individual responsible for the event. The name of the designated host must be provided as a part of the registration.

The designated host must be at least twenty-one (21) years of age. In the case of student clubs and organizations, the designated host will usually be the staff or faculty advisor to that student group. In the case of the Law School, the host will be the person so designated by the governing body of the organization. The designated host agrees to assume the following responsibilities:

- Act as the responsible overseer of the event in general.
- Remain at the event for its duration.
- Cooperate with any investigation of a violation of this policy and other applicable University policies by the Suffolk University Police or University administrator. This includes providing written accounts of any incident observed by or reported to the designated host.

3. Events Requiring University Police Detail

Based on a review of the event and expected attendance during the registration process, University Police may assign officers to events (on-campus or off-campus) at which alcohol is available. The SUPD Chief of Police (or designee) and/or the University Risk Manager shall determine whether a police detail will be required for any event where alcohol is served. The cost of the Police Detail is the responsibility of the office or group hosting the event.

4. Athletic Events

Use of alcoholic beverages is prohibited at all athletic events, both intercollegiate and intramural.

5. Recruitment Events

Alcoholic beverages may not be served at undergraduate recruitment events. This exclusion does not apply to undergraduate admission events at which the majority of attendees are over the age of 21.

6. Events Sponsored by Student Organizations

Because student groups are funded, in total or in part, by student activity fees, special attention must be given to any use of those funds for the purchase of alcoholic beverages. Therefore, alcohol may not be served at an event sponsored by a student organization in the Sawyer Business School, College of Arts and Sciences (including the Student Government Association, Graduate Student Association, and MPA Association), or by the Student Bar Association (SBA) of the Law School, as well as those student organizations the SBA funds, unless an exception is made for one or more of the following reasons:

a. The event is specifically designed for a student population over 21 years of age; or
b. The Office of Student Leadership and Involvement or Law School Dean of Students, working in conjunction with the Office of Risk Management, provides written approval of the event and its sponsor agrees to comply with the regulations in this document covering events with alcohol.

7. Obtaining the Alcohol to be Served

Alcohol served at on-campus events must be purchased through the University's caterer. Donations of alcohol for events must be approved in advance by the Office of Risk Management and the University caterer. The University caterer must serve any donated alcohol.

8. Type of Alcohol

Events on-campus approved for alcoholic beverages (whether served or sold) must limit the alcoholic beverages to beer and wine. The Office of Risk Management may allow an exception to the beer and wine limitation for events where the majority of attendees are non-students and over the age of 21.

9. Prohibition on Marijuana Products

No marijuana products may be served or used at on-campus or off-campus University events (see the University's Drug-Free Schools and Communities Act - Student Notification).

10. Prohibition on Rapid Consumption Devices and Drinking Games

The use of devices intended for rapid consumption of alcohol, including but not limited to funnels, vaporizers, and beer bongs is prohibited. Drinking games are also prohibited.

11. Time Limits on Serving Alcohol at On-campus Events

On-campus functions where alcoholic beverages are served at no charge are to have a serving time limit of two (2) hours. Exceptions to this apply in the following cases:

- Dinner functions may have a serving time of up to (4) hours;
- Law School functions designed to serve both day and evening students may have a serving time of four (4) hours to allow faculty and students of both divisions to attend.

On-Campus functions where alcohol is sold are to have a serving time limit of four (4) hours.

12. Sale of Alcohol at On-Campus Events

Any on-campus event at which alcohol will be sold must be arranged through the University's caterer and the University caterer must staff the event. Additional fees for the required temporary alcohol sale license will apply. The minimum price for a serving of beer shall be $5 and minimum price for a serving of wine shall be $6. An individual will only be allowed to purchase two

alcoholic beverages at one time.

13. Event Location, Disposal and Removal of Alcohol

On-campus events with alcohol may only take place in commonly used function space where food and beverages may be served. Event space must be reserved through the Office of Conferences and Events. All alcohol in opened containers must remain in the approved event location and must be disposed of at the conclusion of the event. Under no circumstances may left over alcohol be removed at the conclusion of the event by guests.

14. Food and Non-Alcoholic Beverages

- Non-alcoholic beverages, in addition to water, must be available at the same place and for the same duration of time as the alcoholic beverages. For on-campus events, free non-alcoholic beverages must be available.
- Food items such as snack food, hors d'oeuvres or full meals must be available for the entire time that alcoholic beverages are being served. If the alcoholic beverages are available at no charge, the food items must be free as well.

15. Advertisement and Promotion of Events with Alcohol

- Alcoholic beverages may not be used to promote or induce potential members to attend any membership programs of any club, athletic team, organization, fraternity, sorority or other university group.
- Alcohol consumption contests are not permitted.
- Alcoholic beverages may not be given as a contest or competition prize.
- Unless granted an exception by the Conference and Events Office or Law Dean of Students Office (for law student events), advertisements for events shall not mention the availability of alcoholic beverages. Promotional materials will not make references to the quantity of beverages (such as number of kegs of beer) nor mention "open bar" or the availability of "drink tickets."

16. Establishing Proof of Age for Events with Alcohol

A. On-campus Events: Individuals who are twenty-one years of age and older who wish to consume alcoholic beverages at approved on-campus events must present proof of age by providing a valid driver's license, a valid passport or other government-issued identification.

   Following the establishment of drinking age, a wristband may be affixed to the individual's wrist as identification for the purpose of consuming alcohol.

   For events where most guests are reasonably expected to be over the age of 21, an acceptable form of identification will be used to determine that drinking age has been established.

B. Off-campus Events: Where an event is held at a venue supplying alcohol to attendees, the University will confirm that the venue checks for proof of age. For events held at a venue where the University supplies the alcohol, the University will follow the procedures for on campus events as detailed in paragraph 16. A.

17. Off-campus University Events

A. Off-campus University events with alcohol that are supported by University funds, including those sponsored by student organizations, must comply with all applicable University policies and procedures, including the University's contract process.
B. The Office of Student Leadership and Involvement or Law School Dean of Students Office, working in conjunction with the Office of Risk Management, may establish additional rules and procedures for Off-campus University events sponsored by student organizations.
C. In accordance with paragraph 3 of this policy, off-campus University events may be subject to staffing by Suffolk University Police.
D. In accordance with paragraph 19 of this policy, Off-campus University events not sponsored by student organizations and not intended for student attendees may be excepted from portions of this policy by the Office of Risk Management.

18. Non-University Groups Hosting Events with Alcohol On-Campus

In order to serve alcohol at an event being held at the University, non-University groups must comply with all use-of-space policies and requirements of Suffolk University. Non-University groups should consult with the University Conference and Events Office for more information. The SUPD Chief of Police (or designee) and/or the University Risk Manager reserve the authority to require an SUPD police detail at events held by non-University groups.

19. Exceptions to this policy; clarifications

The University Risk Manager, in consultation with appropriate University Administrators, may grant exceptions to the policy in extraordinary circumstances. In situations where it is unclear how this policy related to a certain event, the University Risk Manager, in consultation with appropriate University Administrators, shall determine how the matter is to be resolved. In both situations, the decision by the University Risk Manager is final and not subject to appeal.

Alcohol, Drug, and Health Information

Please use these resources for your reference. There are many health and wellness resources on the web, however these resources are dependable and provide the most current information on college health topics.

Alcohol

- **College Drinking, Changing the Culture:** research-based information on issues related to alcohol abuse and binge drinking among college students.
- **Rethinking Drinking:** You can take a look at your drinking habits and how they may

affect your health.

- **Centers for Disease Control (CDC):** General information about the effects of alcohol on health.
- **NIAAA:** Homepage for the National Institute on Alcohol Abuse & Alcoholism
- **Alcoholics Anonymous:** Looking for a meeting in the Boston area?

Marijuana and Other Drugs

- **National Institute on Drug Abuse (NIDA)**. Includes University of Michigan's Monitoring the Future data (2018) and basic info on the extent of use, health effects, and treatment options.
- **National Institute on Drug Abuse for Students**
- **GenerationRx:** Medication safety resources and information for teachers and students (K-college). Student understanding of medication safety issues, particular the dangers of abusing prescription and over-the-counter medications.

Sexual Violence (Sexual Assault, Rape, Harassment)

- Title IX / Nondiscrimination Policy. The policy also tells students what they can do if this happens to them or a friend.
- **Boston Area Rape Crisis Center**: 24/7 hotline 800-841-8371. Free, confidential services to survivors, their friends and families, and professionals ages 12 and older
- **RAINN**: The Rape, Abuse & Incest National Network is the nation's largest anti-sexual assault organization. RAINN operates the National Sexual Assault Hotline at 1.800.656.HOPE and the National Sexual Assault Online Hotline at rainn.org,
- **Centers for Disease Control**

Drug-free Schools & Communities Act - Student Notification

General Policy

The University prohibits the unlawful possession, use, or distribution of illicit drugs and alcohol by employees and students. The University complies with all local, state, and federal regulations pertaining to alcohol and illicit drugs. In addition, the University complies with the regulations of both the Drug-Free Work Place Act of 1988 and the Drug-Free Schools and Communities Act Amendments of 1989.

Communications

As required by the Drug Free Schools and Communities Act, the University will provide an annual written statement to students covering: a) standards of conduct concerning drugs and alcohol; b) federal, state, and local legal sanctions governing the unlawful possession or distribution of illicit drugs or alcohol; c) health risks associated with the use of illicit drugs and the abuse of alcohol; d) a description of counseling and treatment programs available for alcohol and drug abuse; and e) University disciplinary sanctions imposed for unlawful possession, use, or distribution of illicit drugs and alcohol.

Standards of Conduct

The University prohibits the unlawful possession, use, or distribution of illicit drugs, and the unauthorized illegal possession, use, or distribution of alcohol on university property or as any part of a university-sponsored activity.

Federal, State, and Local Legal Sanctions Governing the Unlawful Possession or Distribution of Illicit Drugs or Alcohol

Local, state, and federal laws make illegal use of drugs and alcohol serious crimes. Conviction can lead to imprisonment, fines, and assigned community service. Courts do not lift prison sentences for convicted persons to attend college. A felony conviction for such an offense can prevent students from entering many fields of employment or professions.

The minimum age for the possession, sale or purchase of alcoholic beverages in Massachusetts is 21 years of age. All state laws apply at the University. Cities and towns in Massachusetts, specifically Boston, prohibit public consumption of alcohol and impose fines for violation. Massachusetts has criminal penalties for the use of controlled substances or drugs, with penalties varying with the type of drug. In general, narcotic, addictive, and drugs with potential for abuse carry heavier penalties. Driving while intoxicated in Massachusetts is a serious offense and there are strict penalties for those convicted, including driver's license suspension and imprisonment.

Possession of drugs is illegal without valid authorization. Under federal law, distribution of drugs to persons under age 21 is punishable by twice the normal penalty; with a mandatory one year in prison and a third conviction is punishable by mandatory life imprisonment.

These penalties apply to distribution of drugs in or within 1,000 feet of a college or school. Federal law sets greatly heightened prison sentences for the manufacture and distribution of drugs, if death or serious injury results from the use of the substance. While penalties for possession are generally not as great as for the manufacturing and distribution of drugs, possession of a relatively large quantity may be considered distribution. Under both state and federal laws, penalties for possession, manufacture, and distribution are much greater for second and subsequent convictions. Many laws dictate mandatory prison terms and the full minimum term must be served. Massachusetts makes it illegal to be in a place where heroin is kept and to be in the company of a person known to possess heroin. Anyone in the presence of heroin at a private party risks a serious drug conviction. Sale and possession of drug paraphernalia is illegal in Massachusetts. Persons convicted of drug possession under state or federal law are ineligible for federal student grants and loans for up to one year after the first conviction, and five years after the second; the penalty for distributing drugs is loss of benefits for five years after the first, 10 years after the second, and permanently after the third conviction.

Students should review the following state laws regarding alcohol and other drugs which are available on the Massachusetts General Court website:

- Chapter 138: Alcoholic Liquors
- Chapter 90: Section 24. Driving While Under Influence of Intoxicating Liquor
- Chapter 94C: Controlled Substances Act toc.htm

Drugs of Abuse

Drugs of Abuse - A DEA Resource Guide (2024 Edition) is available from the U.S Department of Justice Drug Enforcement Administration.

Support Services

The University Counseling, Health, and Wellness Department provides help to students regarding alcohol and other drug use and aids with referrals to outside agencies and programs.

Disciplinary Action

The University holds students accountable for violations of this policy through the Student Conduct System. Possible sanctions for violations include, but are not limited to, warning, disciplinary probation, loss of housing, suspension, dismissal, or participation in educational workshops.

Biennial Review

Every two (2) years, the University will review its drug and alcohol policy to determine its effectiveness, implement changes, and ensure that disciplinary sanctions are consistently applied and enforced.

Only in an environment free of substance abuse can Suffolk University fulfill its mission of developing the professional, social, cultural and intellectual potential of each member of its community.

Students are required to review and abide by the University's policies on alcohol and other drugs.

NONDISCRIMINATION POLICY AND GRIEVANCE PROCEDURES

Please note that this 2024 Nondiscrimination Policy applies to all Discrimination complaints that do not fall under Title IX. For complaints under Title IX, the 2020 Nondiscrimination policy will apply.[2]

However, due to ongoing nationwide litigation, Suffolk University may be required to revert back to the 2020 Title IX policy if necessary to comply with court injunctions that are pending in various federal districts. The community will be notified, and this page will be updated when and if the University reverts to the 2020 policy.

Suffolk protects the rights of all sexual orientations, gender identities, and all protected classes enumerated under state and federal law. Consistent with all applicable laws and University policy, these protections remain in place regardless of whether the 2020 or 2024 policy is in effect. The only difference that may impact the Suffolk community is procedural: The 2020 policy requires a live hearing for formal resolution of certain types of Title IX complaints; the 2024 policy allows for a formal resolution process that does not require a live hearing.

Introduction

Suffolk University ("University") seeks to foster a campus environment that supports its educational mission. The University is committed to providing a safe learning, living, and working environment for all members of the University community that is free from all forms of discrimination and harassment on the basis of race, color, national origin, ethnicity, religion, sex, age, disability, sexual orientation, gender, gender identity, gender expression, genetic information, pregnancy or parenting status, military or veteran status, or any other protected characteristic under federal or state law. To ensure compliance with federal and state civil rights laws and regulations, and to affirm its commitment to promoting the goals of fairness and equity in all aspects of the educational program or activity, the University has developed internal policies and procedures that provide a prompt, fair, and impartial process for those involved in an allegation of discrimination or harassment on the basis of protected class status, and for allegations of retaliation.

The University values and upholds the equal dignity of all members of its community and strives to balance the rights of the parties in the grievance process during what is often a difficult time for all those involved. The University complies with Title II, section 504 of the Rehabilitation Act of 1973 and the Americans Disability Act; Title VI and VII of the Civil Rights Act of 1964; Title IX of the Educational Amendments of 1972 ("Title IX"); Violence Against Women Reauthorization Act of 2013 ("VAWA"); Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act ("Clery Act"), Title VIII of the Civil Rights Act of 1968 ("Fair Housing Act"), and all other applicable state and federal laws.

Prohibited discrimination at Suffolk University includes discrimination based on a person's actual or perceived identity. This includes discrimination based on the country, world region, or place

[2] The 2020 policy, titled 2020 Nondiscrimination Policy and Grievance Procedures, is available at https://www.suffolk.edu/about/mission-history/policies-procedures/title-ix-at-suffolk/nondiscrimination-policy-and-grievance-procedures/2020-nondiscrimination-policy-and-grievance-procedures.

where a person or their ancestors come from; a person's limited English proficiency or English learner status; a person's caste/class; or a person's actual or perceived shared ancestry or ethnic characteristics, as well as religious membership (such as, but not limited to, Catholic, Hindu, Jewish, Muslim, Rastafarian, and Sikh individuals).
The University prohibits retaliation against individuals who report discrimination or harassment, assist another in reporting a complaint or otherwise participate in an investigation. Accordingly, such behavior is treated seriously and will result in disciplinary action.

In some cases, a complainant may file a report about an incident or conduct that, after review, is found not to be in violation of the University's non-discrimination policy because the incident or conduct did not relate to a protected class identity. However, in such cases, the incident or conduct will be reviewed in accordance with the appropriate University policies, including student conduct policies.

The University strongly encourages any person who believes they have been subjected to discrimination, harassment, and/or retaliation to report and seek prompt assistance, including medical assistance if necessary.

Additional on and off campus support and resources, including medical assistance, may be accessed via the following links:

- **How do I report sex-based harassment or discrimination?**
- **How do I report discrimination?**
- **How do I report a hate crime?**
- **How do I report a disability grievance?**

Suffolk University Non-Discrimination Statement

This Policy covers nondiscrimination in both employment and access to educational opportunities. Suffolk University does not discriminate against any person on the basis of race, color, national or ethnic origin, national origin, ethnicity, religion, sex, age, disability, sexual orientation, gender, gender identity, gender expression, genetic information, pregnancy or parenting status, military or veteran status or any other characteristic protected under applicable federal or state law in admission to, access to, treatment in, or employment in its programs, activities, or employment.

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

Suffolk University does not discriminate against any employee, applicant for employment, student, or applicant for admission on the basis of actual or perceived:

- Age (40 years and over in the employment context)

- Citizenship status
- Color
- Creed
- Disability (physical or mental)
- Domestic violence victim status
- Ethnicity
- Family responsibilities
- Gender expression
- Gender identity
- Genetic information (including family medical history)
- Height
- Marital status
- National origin (including ancestry)
- Personal appearance
- Place of business
- Political belief or affiliation
- Pregnancy or related conditions
- Race
- Religion
- Residence
- Sex
- Sexual orientation
- Source of income
- Veteran or military status (including disabled veteran, recently separated veteran, active-duty, wartime, or campaign badge veteran, and Armed Forces Service Medal veteran)
- Weight
- or any other protected characteristic under applicable local, state, or federal law, including protections for those opposing discrimination or participating in any grievance process within the institution, with the Equal Employment Opportunity Commission, United States Department of Education Office for Civil Rights, Massachusetts Commission Against Discrimination, and/or other human/civil rights agency.

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

Suffolk University will promptly and effectively address any such discrimination of which it has Knowledge/Notice using the resolution process in the Nondiscrimination Policy.

Nondiscrimination Contacts/Coordinators

Note: This policy refers to all Coordinators who address discrimination. Sections of this policy pertaining only to Title IX Coordinators are noted as such.

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

Suffolk University recognizes that allegations under this Policy may include multiple forms of discrimination and harassment as well as violations of other Suffolk University policies; may involve various combinations of students, employees, and other members of Suffolk University community; and may require the simultaneous attention of multiple Suffolk University departments. Accordingly, all Suffolk University departments will share information, combine efforts, and otherwise collaborate, to the maximum extent permitted by law and consistent with other applicable Suffolk University policies, to provide uniform, consistent, efficient, and effective responses to alleged discrimination, harassment, or retaliation.

The following employees may be contacted for enforcement of this policy in their respective areas:

For sex discrimination and sex-based harassment allegations involving students and/or employees

Catherine LaRaia, J.D.
Director of Office of Title IX & Celery Act Compliance
73 Tremont Street, 13th floor, room 1326
Boston, MA 02108
claraia@suffolk.edu
title9@suffolk.edu
Phone: 617-573-8027

For student discrimination and harassment allegations [not based on sex or disability accommodations]

Cherina Wright, Esq.
Associate Vice President for Student Affairs
Suffolk University
73 Tremont Street, 12th Floor Boston, MA 02108
cwright@suffolk.edu
Phone: 617-573-8157

For student issues involving disability accommodations

Andrew Cioffi
Director, Office of Disability Services
Division of Student Success, Suffolk University
73 Tremont Street, 9th Floor, Boston, MA 02108
acioffi@suffolk.edu

Phone: 617-573-8034
Fax: 617-994-4251

For employee issues involving disability and accommodations

Human Resources
Suffolk University
73 Tremont Street, 11th Floor, Boston, MA 02108
For general inquiries: **humanresources@suffolk.edu**

For employee issues involving disability accommodations

For employee accommodations: **Eeaccomodations@suffolk.edu**
For employee leaves: **Leaves@suffolk.edu**

External Contact Information

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

United States Equal Employment Opportunity Commission (EEOC)
JFK Federal Building, Room 475
Government Center
Boston, MA 02203
800-669-4000

Massachusetts Commission Against Discrimination (MCAD)
One Ashburton Place, Room 601
Boston, MA 02108
617-994-6000

United States Department of Education Office for Civil Rights (OCR)
5 Post Office Square, 8th Floor
Boston, MA 02109
Telephone: 617-289-0111
Facsimile: 617-289-0150
TTY: 1-800-877-8339

Mandatory Title IX Employee Training

In accordance with § 106.8 of the Title IX regulations, all employees are required to complete Title IX training on a yearly basis. The Title IX Coordinator, in collaboration with Human Resources, will disseminate the training to all employees and oversee compliance.

Suffolk University policies define an employee as anyone who receives salary and/or benefits from the University. Employees on leave or sabbatical are expected to complete the training within a

reasonable period of time upon returning to active status, typically within the first thirty days.

Mandated Reporting and Confidential Employees Under Title IX

For sex-based discrimination and harassment under Title IX, all Suffolk University faculty and employees (including student-employees), other than those deemed Confidential Employees, are Title IX Mandated Reporters and are expected to promptly report all known details of actual or suspected sex-based discrimination, harassment, and/or retaliation to appropriate officials immediately, although there are some limited exceptions.

Title IX Mandated Reporters are responsible for communicating that supportive measures are available for the Title IX Complainant at the time of disclosure even if no formal action is to be taken. Title IX Mandated Reporters should inform Complainants that their information will be shared with the Title IX Office and the Title IX Coordinator will contact the Title IX Complainant to offer information and supportive measures.

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

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

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

The following sections describe Suffolk University ’s reporting options for a Title IX Complainant or third party (including parents/guardians when appropriate):

A. Confidential Employees

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

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

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

Confidential Campus Resources

Students Only

- Counseling, Health & Wellness, located on the 5th floor of 73 Tremont Street, 617-573-8226
- Interfaith Center, The Reverend Amy Fisher, located in Sawyer 823, 617-573-8325

Employees Only

Employees and their adult household members have access to the work/life support program through ***KGA Employee Assistance***. For more information, visit the KGA website and enter company code "suffolkuniversity," or call 1-800-648-9557.

B. Reporting to Off-Campus Counseling and Advocacy Resources under Title IX

The University encourages all members of the University community to report any incident of prohibited conduct. The University recognizes, however, that not every person will choose to make a formal report to the University or with local law enforcement. For those who are not prepared to pursue a Title IX complaint, or use the Title IX services provided by the University, students and employees may access resources located in the local community. All members of the University Community are encouraged to utilize the resources available on or off-campus that are best suited to their needs. The Boston area organizations and agencies listed below can provide crisis intervention services, counseling, and legal assistance and can keep the information confidential. Additional resources may be found in **Title IX On/Off Campus Resources.**

Boston Area Rape Crisis Center (BARCC)
800-841-8371 (24-hour hotline)
www.barcc.org
BARCC offers free, confidential services to sexual assault survivors, their friends and families. It also operates a 24-hour confidential hotline that provides survivors of sexual assault with telephone counseling and personal support. The Center also maintains a referral network of survivor support groups (call 617-492-RAPE or 617-492-7273).

Casa Myrna Vasquez
617-521-0100
www.casamyrna.org
Casa Myrna offers a comprehensive range of services, available in both Spanish and English, for survivors of domestic and dating violence, to assist with the tools to recover from the trauma of abuse and begin to build sustainable self-sufficiency.

Gay Lesbian Bisexual Transgender Queer (BARCC)
617-354-6056
The GLBTQ Domestic Violence Project provides free and confidential support and services for gay, lesbian, bisexual, transgender, and queer survivors of domestic and sexual violence. It collaborates with victims and survivors to increase safety, security, and foster empowerment through direct services, education, and advocacy.

Fenway Health Violence Recovery Program (VRP)
617-927-6202
www.fenwayhealth.org/care/behavioral-health/violence-recovery/
VRP provides counseling, support groups, advocacy, and referral services to Lesbian, Gay, Bisexual and Transgender (LGBT) victims of bias crime, domestic violence, sexual assault, and police misconduct.

Asian Task Force Against Domestic Violence
617-338-2355 (24- hour multilingual helpline)

Victim Rights Law Center (VRLC)
617-399-6720
www.victimrights.org
VRLC is dedicated to serving the legal needs of sexual assault victims. The VRLC provides free legal services, legal training, and technical assistance.

REACH
800-899-4000
www.reachma.org
REACH promotes healthy relationships and works to end domestic violence by actively advocating for survivors.

C. Reporting to University Officials with Authority

A complaint may also be filed with the following individuals who have been identified by the University as Officials with Authority (OWA). An OWA is an administrator at the University who has the authority to institute corrective measures on behalf of the University, and must inform the Title IX Coordinator if they receive a report.

University Officials with Authority

- University President
- Provost

- Senior Vice President Finance, Treasurer
- Senior Vice President External Affairs
- Senior Vice President, Advancement
- Vice President for Student Affairs
- Associate Vice President for Student Affairs
- Vice President, Communications
- Vice President, Admissions and Financial Aid
- Vice President, Diversity, Access & Inclusion
- Dean, College of Arts & Science
- Dean, Suffolk University Law School
- Dean of Undergraduate Student Affairs
- Dean of Law and Graduate Student Affairs
- Dean, Sawyer Business School
- Chief Human Resources Officer
- Title IX Coordinator

Disability-Based Grievances and Complaints

Students with disabilities who believe they have received inappropriate treatment or inadequate service from the University pertaining to their requested accommodations have the right to file a grievance with the Director of Disability Services (DSS)

This grievance process is for accommodation issues that have not been resolved by Office of Disability Services (ODS). Grievances related to disability status and/or provision of accommodations are addressed for students using the procedures in **our grievance page** and employees should contact their **Human Resources** representative with any disability or accommodation concerns.

However, allegations of discrimination on the basis of an actual or perceived disability, including instances in which the provision of reasonable accommodations has a discriminatory effect, will be resolved under the Nondiscrimination policy. A complaint of disability discrimination unrelated to accommodation requests can be filed **here.**

Scope

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

This Policy applies to all employees and students, and other individuals participating in or attempting to participate in Suffolk University ’s program or activities, including education and employment.

This Policy prohibits all forms of discrimination on the basis of the protected characteristic(s) listed in the Notice of Nondiscrimination. The Nondiscrimination Policy may be applied to

incidents, to patterns, and/or to the institutional culture/climate, all of which may be addressed in accordance with this Policy.

Jurisdiction

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

This Policy may also apply to the effects of off-campus misconduct that limit or deny a person's access to Suffolk University 's education program or activities. At the discretion of the Coordinator based on the Nondiscrimination Policy, Suffolk University may also extend jurisdiction to off-campus and/or to online conduct when the conduct affects a substantial Suffolk University interest.

A substantial Suffolk University interest includes:

1. Any action that constitutes a criminal offense as defined by law. This includes, but is not limited to, single or repeat violations of any local, state, or federal law.
2. Any situation in which it is determined that the Respondent poses an immediate threat to the physical health or safety of any student, employee, or other individual.
3. Any situation that significantly creates a hostile environment as defined in this policy or denies meaningful to access to a university employment, educational program, or activity.

For disciplinary action to be issued under this Policy, the Respondent must be a Suffolk University faculty member, student, or employee at the time of the alleged incident. If the Respondent is unknown or is not a member of Suffolk University community, the Coordinator will offer to assist the Complainant in identifying appropriate institutional and local resources and support options, and will implement appropriate supportive measures and/or remedial actions (e.g., trespassing a person from campus). Suffolk University can also assist in contacting local or institutional law enforcement if the individual would like to file a police report about criminal conduct.

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

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

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

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

Alumnus and former employees are encouraged to report past incidents that fall under this policy; however, the University's response will be dependent on issues of jurisdiction over the parties and other fact-specific considerations.

Supportive Measures

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

The Coordinator promptly makes supportive measures available to the Parties upon receiving Notice/Knowledge or a Complaint. Supportive measures are available to parties regardless of whether a complaint has been filed. At the time that supportive measures are offered, if a Complaint has not been filed, Suffolk University will inform the Complainant, in writing, that they may file a Complaint with Suffolk University either at that time or in the future. The Coordinator will work with a party to ensure that their wishes are considered with respect to any planned and implemented supportive measures.

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

These actions may include, but are not limited to:

- Referral to counseling, medical, and/or other healthcare services.
- Referral to the Employee Assistance Program.
- Referral to community-based service providers.
- Visa and immigration assistance
- Student financial aid counseling
- Education to the institutional community or community subgroup(s).
- Altering campus housing assignment(s).
- Altering work arrangements for employees or student-employees.
- Safety planning.

- Providing campus safety escorts.
- Providing transportation assistance.
- Implementing contact limitations (no contact orders) between the Parties.
- Academic support, extensions of deadlines, or other course/program-related adjustments.
- No Trespass Order.
- Class schedule modifications, withdrawals, or leaves of absence.
- Increased security and monitoring of certain areas of the campus.
- Any other actions deemed appropriate by the Title IX Coordinator.

Violations of no contact orders or other restrictions may be overseen by the Office of Title IX, or referred at the discretion of the Office of Title IX, to appropriate student or employee conduct processes for enforcement or added as collateral misconduct allegations to an ongoing Complaint under this Policy.

The Parties are provided with a timely opportunity to seek modification or reversal of Suffolk University 's decision to provide, deny, modify, or terminate supportive measures applicable to them. A request to do so should be made in writing to the Coordinator. An impartial employee other than the employee who implemented the supportive measures, who has authority to modify or reverse the decision, will determine whether to provide, deny, modify, or terminate the supportive measures if they are inconsistent with the definition of supportive measures in § 106.2 of the federal Title IX Regulations. Suffolk University will also provide the Parties with the opportunity to seek additional modification or termination of supportive measures applicable to them if circumstances change materially. Suffolk University typically renders decisions on supportive measures within seven (7) business days of receiving a request and provides a written determination to the impacted party(ies) and the Coordinator.

Prohibited Conduct

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

The sections below describe the specific forms of legally prohibited discrimination, harassment, and retaliation that are also prohibited under Suffolk University Policy.

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

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

Violation of any other Suffolk University policies may constitute discrimination or harassment

when motivated by actual or perceived protected characteristic(s), and the result is a limitation or denial of employment or educational access, benefits, or opportunities.

A. Discrimination

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

Discrimination can take two primary forms:

1. Disparate Treatment Discrimination

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

- Excludes an individual from participation in;
- Denies the individual benefits of; or
- Otherwise adversely affects a term or condition of an individual's participation in a Suffolk University program or activity.

2. Disparate Impact Discrimination

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

- Excludes an individual from participation in;
- Denies the individual benefits of; or
- Otherwise adversely affects a term or condition of an individual's participation in a Suffolk University program or activity.

B. Discriminatory Harassment

- unwelcome conduct on the basis of actual or perceived protected characteristic(s), that
- based on the totality of the circumstances,
- is subjectively and objectively offensive, and
- is so severe or pervasive,
- that it limits or denies a person's ability to participate in or benefit from Suffolk University 's education program or activity

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

Sex-based Harassment is a form of sex discrimination and means sexual harassment and other harassment on the basis of sex[1], including sex stereotypes, sex characteristics, pregnancy or related conditions, sexual orientation, and gender identity; sexual assault, dating violence, domestic violence, and stalking.

[1]*Throughout this Policy, "on the basis of sex" means conduct that is sexual in nature, or that is*

directed to the Complainant because of his/her/their actual or perceived sex or gender identity.

1. ***Quid pro quo***

- an employee agent, or other person authorized by Suffolk University,
- to provide or deny an aid, benefit, or service under Suffolk University 's education program or activity,
- explicitly or impliedly conditioning the provision or denial of such aid, benefit, or service,
- on a person's participation in unwelcome sexual conduct.

2. ***Hostile Environment Harassment***

- unwelcome sex-based conduct, that
- based on the totality of the circumstances,
- is subjectively and objectively offensive, and
- is so severe or pervasive,
- that it limits or denies a person's ability to participate in or benefit from Suffolk University 's education program or activity.

Suffolk University reserves the right to address offensive conduct and/or harassment that (1) does not rise to the level of creating a hostile environment, or (2) that is of a generic nature and not based on a protected characteristic. Addressing such conduct will not result in the imposition of discipline under Suffolk University Policy, but may be addressed through respectful conversation, remedial actions, education, effective alternative resolution, and/or other Informal Resolution mechanisms.

For assistance with alternative resolution and/or other Informal Resolution techniques and approaches, contact the Coordinator.

3. ***Sexual Assault***[2]

[2]*This would include having another person touch you sexually, forcibly, and/or without their consent.*

a. ***Rape***

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

b. Fondling

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

c. Incest

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

d. Statutory Rape

- Sexual intercourse,
- with a person who is under the statutory age of consent of sixteen under Massachusetts law.

4. Dating Violence, defined as

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

5. Domestic Violence,[3] defined as

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

[3]*To categorize an incident as Domestic Violence under this Policy, the relationship between the Respondent and the Complainant must be more than just two people living together as roommates. The people cohabitating must be current or former spouses or have an intimate relationship.*

6. Stalking/Cyberstalking, defined as

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

For the purposes of this definition:

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

D. Online Harassment and Misconduct

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

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

Online and off campus conduct will be assessed to determine whether the social media and off-campus conduct creates or contributes to a hostile environment.[4] Nothing in this Policy is intended to infringe upon or limit a person's rights to free speech. In other words, any online posting or other electronic communication by students, including technology-facilitated bullying, stalking, harassment, etc., occurring completely outside of Suffolk University 's control (e.g., not on Suffolk University networks, websites, or between Suffolk University email accounts) will be subject to this Policy only when such online conduct creates a hostile environment or substantially interferes with access to a University employment, educational program, or activity. Even if such

communication is otherwise protected by the tenants of free speech and freedom of expression, the university will nevertheless provide supportive measures for Complainants who have been impacted by said speech.

Off-campus harassing speech by employees, whether online or in person, may be regulated by Suffolk University only when such speech is made in an employee's official or work-related capacity or creates a hostile environment at the university or substantially interferes with a university employment, educational program or activity.

[4]*An environment can become hostile when, unwelcome conduct or harassment is based on a protected class such as race, sex, pregnancy, religion, national origin, age, disability, or shared ancestry. Hostile environment harassment is continued and long-lasting, and severe enough that the environment becomes intimidating, offensive, or abusive.*

E. Other Prohibited Conduct

1. Sexual Exploitation[5]

[5]*This offense is not classified under Title IX as "Sex-based harassment," but it is included here in this Policy as a tool to address a wider range of behaviors.*

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

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

- Sexual voyeurism (such as observing or allowing others to observe a person undressing or using the bathroom or engaging in sexual acts, without the consent of the person being observed).
- Invasion of sexual privacy (e.g., doxxing).
- Knowingly making an unwelcome disclosure of (or threatening to disclose) an individual's sexual orientation, gender identity, or gender expression.
- Taking pictures, video, or audio recording of another in a sexual act, or in any other sexually related activity when there is a reasonable expectation of privacy during the activity, without the consent of all involved in the activity; or exceeding the boundaries of consent (such as allowing another person to hide in a closet and observe sexual activity, or disseminating sexual pictures without the photographed person's consent), including the making or posting of non-consensual pornography.
- Prostituting another person.
- Engaging in sexual activity with another person while knowingly infected with human immunodeficiency virus (HIV) or a sexually transmitted disease (STD) or infection (STI), without informing the other person of the virus, disease, or infection.
- Causing or attempting to cause the incapacitation of another person (through alcohol, drugs, or any other means) for the purpose of compromising that person's ability to give consent to sexual activity, or for the purpose of making that person vulnerable to non-consensual sexual activity.

- Misappropriation of another person's identity on apps, websites, or other venues designed for dating or sexual connections (e.g., spoofing).
- Forcing a person to take an action against that person's will by threatening to show, post, or share information, video, audio, or an image that depicts the person's nudity or sexual activity.
- Knowingly soliciting a minor for sexual activity.
- Engaging in sex trafficking.
- Knowingly creating, possessing, or disseminating child sexual abuse images or recordings.
- Creating or disseminating synthetic media, including images, videos, or audio representations of individuals doing or saying sexually-related things that never happened, or placing identifiable real people in fictitious pornographic or nude situations without their consent (i.e., Deepfakes).
- Creating or disseminating images or videos of child sexual abuse material.

2. Retaliation

Retaliation should be reported promptly to the relevant Nondiscrimination Contact/Coordinator or Suffolk University Police Department and may result in sanctions/disciplinary action in addition to the University's response to the underlying allegations of harassment and/or discrimination. Retaliation is defined as:

- Adverse action, including intimidation, threats, coercion, or discrimination,
- against any person,
- by Suffolk University, a student, employee, or a person authorized by Suffolk University to provide aid, benefit, or service under Suffolk University's education program or activity,
- for the purpose of interfering with any right or privilege secured by law or Policy, or
- because the person has engaged in protected activity, including reporting information, making a Complaint, testifying, assisting, or participating or refusing to participate in any manner in an investigation or Resolution Process under the Equal Opportunity, Harassment, and Nondiscrimination Procedures, including an Informal Resolution process, or in any other appropriate steps taken by Suffolk University to promptly and effectively end any sex discrimination in its education program or activity, prevent its recurrence, and remedy its effects.

The exercise of rights protected under the First Amendment does not constitutes retaliation. It is also not retaliation for Suffolk University to pursue Policy violations against those who make materially false statements in bad faith in the course of a resolution under the Equal Opportunity, Harassment, and Nondiscrimination Policy. However, the determination of responsibility, by itself, is not sufficient to conclude that any party has made a materially false statement in bad faith.

3. Unauthorized Disclosure[6]

[6]*Nothing in this section restricts the ability of the Parties to: obtain and present evidence, including by speaking to witnesses (as long as it does not constitute retaliation under this Policy), consult with their family members, confidential resources, or Advisors; or otherwise prepare for or participate in the Resolution Process.*

- Distributing or otherwise publicizing materials created or produced during an investigation or Resolution Process except as required by law or as expressly permitted by Suffolk University; or
- publicly disclosing a party's personally identifiable information without authorization or consent.

4. Failure to Comply/Process Interference

- Intentional failure to comply with the reasonable directives of a Coordinator in the performance of their official duties, including with the terms of a no contact order.
- Intentional failure to comply with emergency removal or interim suspension terms.
- Intentional failure to comply with sanctions.
- Intentional failure to adhere to the terms of an agreement achieved through informal resolution.
- Intentional failure to comply with mandated reporting duties as defined in this Policy.
- Intentional interference with the Title IX resolution process, including but not limited to:
  - Destruction of or concealing of evidence.
  - Actual or attempted solicitation of knowingly false testimony or providing false testimony or evidence.
  - Intimidating or bribing a witness or party.

Sanctions for the above-listed Civil Rights Offenses range from warning through expulsion/termination.

F. Affirmative Consent

Affirmative consent must be present to engage in sexual activity. Affirmative consent must be informed, voluntary, and active, meaning that, through the demonstration of clear words or actions, a person has indicated permission to engage in mutually agreed-upon sexual activity. Affirmative consent can be withdrawn at any time, and cannot be obtained by force, expressed or implied, or when physical violence, threats, intimidation and/or coercion is used. Affirmative consent to one form of sexual activity (kissing or fondling) does not, by itself, constitute affirmative consent to another form of sexual activity (intercourse). Past consent to sexual activity with another person does not imply ongoing future consent with that person or consent to the same sexual activity with another person.

Silence, absence of protest, or absence of resistance does not imply affirmative consent. Relying solely on non-verbal communication before or during sexual activity can lead to misunderstanding and may result in violation of the policy. Since individuals may experience the same interaction in

different ways, it is the responsibility of each party to determine that the other has consented before engaging in the sexual activity. In order to avoid confusion or ambiguity, participants are encouraged to talk with one another before engaging in sexual activity. If confusion or ambiguity arises during sexual activity, participants are encouraged to stop and clarify a mutual willingness to continue the activity.

Affirmative consent cannot be gained by taking advantage of the incapacitation of another, where the person initiating sexual activity knew or reasonably should have known that the other was incapacitated. Incapacitation means that a person lacks the ability to make informed, rational judgments about whether to engage in sexual activity.

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

G. Incapacitation

A person who is incapacitated is unable to give affirmative consent because of mental or physical incapacitation or impairment, which may include sleep or sleep deprivation, disorientation, unconsciousness, or lack of awareness that sexual activity is taking place. A person may be incapacitated as a result of the consumption of alcohol or other drugs, or due to a temporary or permanent physical or mental health condition. When evaluating whether someone consented to sexual activity after consuming alcohol or drugs, the University will consider whether a reasonable person should have known about the impact of alcohol and other drugs on the other party's ability to give consent.

Incapacitation occurs when someone cannot make rational, reasonable decisions because they lack the capacity to give knowing/informed consent (e.g., to understand the "who, what, when, where, why, or how" of their sexual interaction).

Incapacitation is determined through consideration of all relevant indicators of an individual's state and is not synonymous with intoxication, impairment, blackout, and/or being drunk

Voluntary intoxication is not a defense to any prohibited conduct performed by a party while under the influence of intoxicants.

H. Force

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

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

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

I. Non-Fraternization Policy[7]

[7]*Unethical relationships based on roles of the involved individuals.*

Expectations Regarding Unethical Relationships

Individuals in positions of power must be aware that romantic or sexual relationships with students are fraught with danger for exploitation and pose a legal risk to both the individual and the University.

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

Even when the Parties have initially consented to romantic or sexual involvement, the possibility of a later allegation of a relevant Policy violation still exists. Suffolk University does not wish to interfere with private choices regarding personal relationships when these relationships do not interfere with Suffolk University 's goals and policies. However, for the personal protection of members of this community, relationships in which power differentials are inherent (e.g., faculty-student, staff-student) are generally discouraged. They may also violate standards of professionalism and/or professional ethics.

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

This type of relationship includes Resident Assistants (RAs) and students for whom the RA has direct responsibility. While no relationships are specifically prohibited by this Policy, failure to timely self-report such relationships to a supervisor as required can result in disciplinary action for an employee.

When one of the parties in a formal resolution process is an employee, the coordinator will notify Human Resources and determine whether to refer violations of this provision to Human Resources for resolution, or to pursue resolution under this Policy, based on the circumstances of the allegation.

Pregnancy, Parenting, and Related Conditions

Students, employees, and applicants experiencing pregnancy or related conditions have equal access to education, employment, and other University programs and activities. Discrimination based on pregnancy, childbirth, termination of pregnancy, lactation, related medical conditions, or recovery from these conditions will not be tolerated. In addition, the University will provide reasonable modifications for students and employees based on pregnancy or related conditions.

Definitions

- Familial Status: The configuration of one's family or one's role in a family.
- Marital Status: The state of being married or unmarried.
- Parental Status: The status of a person who, with respect to another person who is under the age of 18, or a person who is 18 or older but who is incapable of self-care because of a mental or physical disability, is a biological, adoptive, foster, or stepparent; a legal custodian or guardian; in loco parentis with respect to such a person; or actively seeking legal custody, guardianship, visitation, or adoption of such a person.
- Pregnancy and Related Conditions: The full spectrum of processes and events connected with pregnancy, including pregnancy, childbirth, termination of pregnancy, or lactation; related medical conditions; and recovery therefrom.
- Reasonable Modifications: Individualized modifications to Suffolk's policies, practices, or procedures that does not fundamentally alter the Suffolk's education program or activity.

Information Sharing Requirements

All Suffolk employees who become aware of a student's pregnancy or related condition are required to provide the student with the Title IX Coordinator's contact information and communicate that the Coordinator can help take specific actions to prevent discrimination and ensure equal access to Suffolk's education program and activity. All employees are welcome to contact the Title IX Coordinator at any time to discuss questions or concerns. Upon notification of a student's pregnancy or related condition, the Title IX Coordinator will contact the student and inform the student of Suffolk's obligations to:

- Prohibit sex discrimination.
- Provide reasonable modifications.
- Allow access, on a voluntary basis, to any separate and comparable portion of the institution's education program or activity.
- Allow a voluntary leave of absence.
- Ensure lactation space availability.
- Maintain a Resolution Process for alleged discrimination.
- Treat pregnancy as comparable to other temporary medical conditions for medical benefit, service, plan, or policy purposes.

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

Reasonable Modifications for Students

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

Reasonable Modifications may include:

- Breaks during class to express breast milk, breastfeed, or attend to health needs associated with pregnancy or related conditions, including eating, drinking, or using the restroom,
- Intermittent absences to attend medical appointments.
- Access to online or homebound education.
- Changes in schedule or course sequence.
- Time extensions for coursework and rescheduling of tests and examinations.
- Allowing a student to sit or stand, or carry or keep water nearby.
- Counseling.
- Changes in physical space or supplies (for example, access to a larger desk or a footrest).
- Elevator access.
- A larger uniform or other required clothing or equipment.
- Other changes to policies, practices, or procedures determined by the Title IX Coordinator.

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

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

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

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

Right to Participate

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

- A specific level of physical ability or health is necessary for participation; and
- The institution requires this documentation of all students participating; and
- The information obtained is not used as a basis for pregnancy-related discrimination.

Lactation Space Access

The Recipient provides students and employees with access to lactation spaces that are functional, appropriate, and safe. Such spaces are regularly cleaned, shielded from view, and free from the intrusion of others.

Lactation spaces are located in the following locations:

- 73 Tremont Street – Room 1195, 11th floor
- Sawyer Building – Room 934, 9th floor
- Sargent Hall – Room 195, Lobby (near lockers)

Leaves of Absence

A. Students

Students are permitted to take a voluntary leave of absence for a reasonable time as deemed medically necessary by their health care provider because of pregnancy and/or the birth, adoption, or placement of a child. The leave term may be extended in the case of extenuating circumstances or medical necessity. Students who elect to take leave under this policy must complete the required **Student Affairs forms** relating to leave.

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

Continuation of students' scholarship, fellowship, or similar Suffolk-sponsored funding during the leave term will depend on the students' registration status and the policies of the funding program

regarding registration status. Students will not be negatively impacted by or forfeit their future eligibility for their scholarship, fellowship, or similar Suffolk-supported funding by exercising their rights under this policy.

The Title IX Coordinator will assist the student with notification to Student Affairs and the completion of any necessary paperwork.

B. Employees

Information on employment leave can be found by emailing **Leaves@suffolk.edu**.

Student Parents

Students are encouraged to work with their advisors and faculty members to address any caretaking/parenting responsibilities that may impact their academic requirements. Students are encouraged to contact the Office of Title IX with any questions or concerns.

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

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

University Housing

A pregnant student's University housing status will not be altered based on pregnancy status unless requested by the student. Parenting students' access to housing is governed by the **Residence Life Policies**.

Policy Dissemination and Training Requirements

A copy of this pregnancy and parenting policy will be made available to faculty and employees in annually required training and posted on the Suffolk website. Suffolk will educate all new students about this policy and the location of this policy as part of orientation. The Office of Title IX will make educational materials available to all members of the Suffolk community to promote compliance with this policy and familiarity with its procedures.

Standard of Proof

Suffolk University uses the preponderance of the evidence standard of proof when determining whether a Policy violation occurred. This means that Suffolk University will decide whether it is more likely than not based upon the available information at the time of the decision, that the Respondent is in violation of the alleged Policy violation(s).

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

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

1. File a Complaint with, or give verbal Notice directly to, the Coordinator. Such a Complaint may be made at any time (including during non-business hours) by using the telephone number, email address, or by mail to the office of the Coordinator.
2. Report a **Title IX incident** or **other Discrimination Incident** online. Anonymous Notice is accepted. Anonymous Notice typically limits Suffolk University 's ability to investigate, respond, and provide remedies, depending on what information is shared. Measures intended to protect the community or redress or mitigate harm may be enacted. It also may not be possible to provide supportive measures to Complainants who are the subject of anonymous Notice.

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

Minors Reporting Requirements Under Title IX

In addition to having enrolled students who are minors, Suffolk hosts minors as guests. Sexual misconduct against minors, whether perpetrated by University employees, volunteers, contractors, or students, is a form of discrimination covered by Title IX. Sexual misconduct including sexual harassment, relationship violence and stalking involving a minor who is a student will be processed consistent with this Policy.

Additionally, Massachusetts law imposes a duty to report on teachers (faculty), educational administrators, mental health professionals, counselors, clergy and law enforcement to report certain crimes involving minors, and abuse, to appropriate officials. Suffolk's protocol is that all employees shall report all suspected child abuse (physical and emotional), sexual abuse of minors, and criminal acts involving minors to the SUPD immediately and without delay. SUPD is the University's designated agent in charge for state mandated reporting. Clery Act reporting of offenses for statistical purposes occurs whether victims are minors or adults.

Whether involving a student or non-student, the University, the Title IX Coordinator, and/or privileged and confidential personnel also may be required to report sexual misconduct involving a minor to the Massachusetts Department the of Children and Families. (June 2020)

Time Limits on Reporting

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

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

False Allegations and Evidence

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

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

Confidentiality Privacy

Suffolk University makes every effort to preserve the Parties' privacy. Suffolk University will not share the identity of any individual who has made a Complaint of harassment, discrimination, or retaliation; any Complainant; any individual who has been reported to be the perpetrator of discrimination, harassment, or retaliation; any Respondent; or any witness, except as permitted by, or to fulfill the purposes, of applicable laws and regulations (e.g., Title IX), Family Educational Rights and Privacy Act (FERPA) and its implementing regulations, or as required by law; including any investigation, or resolution proceeding arising under these policies and procedures.[8,9] Additional information regarding confidentiality and privacy can be found in Appendix B.

[8]20 U.S.C. 1232g
[9]34 C.F.R. § 99

Unauthorized Disclosure of Information

Parties and Advisors are prohibited from unauthorized disclosure of information obtained by Suffolk University through the Resolution Process, to the extent that information is the work

product of Suffolk University (meaning it has been produced, compiled, or written by Suffolk University for purposes of its investigation and resolution of a Complaint). It is also a violation of Suffolk University Policy to publicly disclose work product or a party's personally identifiable information without authorization or consent. Violation of this Policy is subject to significant sanctions.

Disclosures

All Suffolk students, current or prospective, are required to truthfully respond to application questions and comply with any ongoing duty to disclose information as required by the University. Employees must report criminal convictions consistent with the Employee Handbook. Failure to disclose required application information for employees or students may impact employment, acceptance, or enrollment at Suffolk University.

Emergency Removal/Interim Actions/Leaves

Suffolk University can act to remove a student Respondent accused of Sex Discrimination or Sex-based Harassment from its education program or activities, partially or entirely, on an emergency basis when an individualized safety and risk analysis has determined that an immediate threat to the physical health or safety of any student or other individual justifies removal. This risk analysis is performed by the Title IX Coordinator and may be done in conjunction with the Threat Assessment Team using its standard objective violence risk assessment procedures. Employees are subject to existing procedures for interim actions and leaves. Appeals of emergency removals will be handled under the Threat Assessment Team's policies and procedures.

Federal Timely Warning Obligations

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

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

Amnesty

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

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

Students and employees, whether as parties to the proceedings or as witnesses, are expected to provide truthful testimony.

Students

To encourage reporting and participation in the process, a party or witness will not be subject to sanctions/disciplinary action by the University for their improper use of alcohol or drugs, unless the use of alcohol or drugs was done in furtherance of the sexual misconduct act, such as causing someone to consume an intoxicant without the recipient's knowledge and consent.

Employees

Sometimes, employees are hesitant to report discrimination, harassment, or retaliation they have experienced for fear of getting in trouble themselves. Suffolk University may offer employee Complainants amnesty from such policy violations (typically more minor policy violations) related to the incident.

Federal and State Statistical Reporting Obligations

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

1. All "primary crimes," which include criminal homicide, sexual assault, robbery, aggravated assault, burglary, motor vehicle theft, and arson
2. Hate crimes, which include any bias-motivated primary crime as well as any bias-motivated larceny or theft, simple assault, intimidation, or destruction/damage/vandalism of property
3. Violence Against Women Act (VAWA-based crimes), which include sexual assault, domestic violence, dating violence, and stalking[10]
4. Arrests and referrals for disciplinary action for weapons law violations, liquor law violations, and drug law violations

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

[10]VAWA is the Violence Against Women Act, enacted in 1994 and codified in part at 42 U.S.C. sections 13701 through 14040.

Massachusetts Campus Sexual Assault Law

The 2021 Campus Sexual Assault Law includes a new reporting requirement (M.G.L. c. 6 § 168E (q)), which directs institutions to report annually on sexual misconduct incidents on campus.

All personally identifiable information is kept private, but statistical information regarding the type of incident and its general location (on- or off-campus or in the surrounding area, but no addresses are given) must be shared with the Massachusetts Department of Education for publication in the Annual Report.

Revision of This Policy

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

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

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

This Policy is effective August 1, 2024.

RESOLUTION PROCESS FOR ALLEGED VIOLATIONS OF THE NONDISCRIMINATION POLICY

Overview

Suffolk University will act on any Notice, Complaint, or Knowledge of a potential violation of the Equal Opportunity, Harassment, and Nondiscrimination Policy ("the Policy") that is received by the Coordinator[12] or any other Mandated Reporter by applying the Resolution Process below.

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

[12]*Anywhere this procedure indicates "Coordinator," Suffolk University may substitute a trained designee.*

Notice/Complaint

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

Collateral Misconduct

Collateral misconduct is defined to include potential violations of other Suffolk University policies not incorporated into the Policy on Equal Opportunity, Harassment, and Nondiscrimination that occur in conjunction with, or as a result of, alleged violations[13] of the Policy, or that arise through the course of the investigation, for which it makes sense to provide one resolution for all charges. Thus, the collateral allegations may be charged along with potential violations of the Policy, to be resolved jointly under these Procedures. In such circumstances, the Coordinator may consult with Suffolk University officials who typically oversee such conduct (e.g., human resources, student conduct, academic affairs) to solicit their input as needed on what charges should be filed, but the exercise of collateral charges, either jointly or standing alone, under these procedures is within the discretion of Coordinator. All other allegations of misconduct unrelated to incidents covered by the Policy will typically be addressed separately through procedures described in the student, faculty, and staff handbooks.

[13]*This includes alleged violations of Title IX-issued No Contact Orders.*

Initial Evaluation

The Coordinator conducts an initial evaluation typically within seven (7) business days of receiving Notice/Complaint/Knowledge of alleged misconduct.[14] The initial evaluation typically includes:

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

Helping a Complainant to Understand Options

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

- Working with the Complainant to determine whether the Complainant wishes to pursue one of three resolution options:
  - a supportive and remedial response, and/or
  - Informal Resolution, or
  - the Resolution Process is described below.

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

If the Complainant elects for the Resolution Process below, and the Coordinator has determined the Policy applies and that Suffolk University has jurisdiction, they will route the matter to the appropriate Resolution Process, will provide the Parties with a Notice of Investigation and Allegation(s), and will initiate an investigation consistent with these Procedures.

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

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

Coordinator Authority to Initiate a Complaint

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

- The Complainant’s request not to proceed with initiation of a Complaint.
- The Complainant’s reasonable safety concerns regarding initiation of a Complaint.
- The risk that additional acts of discrimination would occur if a Complaint were not initiated.
- The severity of the alleged discrimination, including whether the discrimination, if established, would require the removal of a Respondent from campus or imposition of another disciplinary sanction to end the discrimination and prevent its recurrence.
- The age and relationship of the Parties, including whether the Respondent is a Suffolk University employee.
- The scope of the alleged discrimination, including information suggesting a pattern,

ongoing discrimination, or discrimination alleged to have impacted multiple individuals;

- The availability of evidence to assist a Decision-maker in determining whether discrimination occurred;
- Whether Suffolk University could end the alleged discrimination and prevent its recurrence without initiating its resolution process.

If deemed necessary, the Coordinator may consult with appropriate Suffolk University employees, and/or conduct a threat assessment to aid their determination whether to initiate a Complaint.

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

[14]If circumstances require, the Coordinator may designate another person to oversee the Resolution Process should an allegation be made about the Coordinator making them unavailable to fulfill their duties or have a conflict of interest.

Dismissal

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

1. Suffolk University is unable to identify the Respondent after taking reasonable steps to do so.
2. Suffolk University no longer enrolls or employs the Respondent.
3. A Complainant voluntarily withdraws any or all of the allegations in the Complaint, and the Coordinator declines to initiate a Complaint.
4. Suffolk University determines the conduct alleged in the Complaint would not constitute a Policy violation, if proven,

A Decision-maker can recommend dismissal to the Coordinator, if they believe the grounds are met. A Complainant who decides to withdraw a Complaint may later request to reinstate or refile it.

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

This dismissal decision is appealable by any party.

Appeal of Dismissal

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

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

Throughout the dismissal appeal process, Suffolk University will:

- Implement dismissal appeal procedures equally for the Parties;
- Assign a trained Dismissal Appeal Officer who did not take part in an investigation of the allegations or dismissal of the Complaint;
- Provide the Parties a reasonable and equal opportunity to make a statement in support of, or challenging, the dismissal; and
- Notify the Parties of the result of the appeal and the rationale for the result.

The grounds for dismissal appeals are limited to:

- Procedural irregularity that would change the outcome;
- New evidence that would change the outcome and that was not reasonably available when the dismissal was decided;
- The Coordinator, Investigator, or Decision-maker had a conflict of interest or bias for or against complainants or respondents generally or the individual Complainant or Respondent that would change the outcome.

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

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

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

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

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

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

Emergency Removal/Interim Suspension of a Student

Suffolk University may emergency remove a student accused of Sex Discrimination or Sex-based Harassment upon receipt of Notice/Knowledge, a Complaint, or at any time during the resolution process. Prior to an emergency removal, the Coordinator will conduct a threat assessment determining whether the student is an imminent and serious threat to the health or safety of a Complainant or any students, employees, or other persons arising from the allegations of sex discrimination justifies such action. Where a student has been found to pose an imminent and serious threat, the Coordinator will work in conjunction with the Threat Assessment Team for emergency removal process under the Threat Assessment Team policy. Suffolk University will proceed using the Threat Assessment Team policy and procedures.

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

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

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

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

Placing an Employee on Leave

When the Respondent is an employee, or a student employee accused of misconduct in the course of their employment, existing policies or provisions for interim action are typically applicable instead of the above emergency removal process.

Counter-Complaints

Suffolk University is obligated to ensure that the resolution process is not abused for retaliatory purposes. Counter-Complaints will be assessed to determine whether the allegations in the Counter-Complaint are made in good faith. When Counter-Complaints are not made in good faith, they will not be permitted. They will be considered potentially retaliatory and may constitute a violation of the Policy.

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

Advisors in the Resolution Process

A. Who Can Serve as an Advisor?

The Parties may each have an Advisor (friend, mentor, family member, attorney, or any other individual a party chooses) present with them for all meetings, interviews, and hearings within the Resolution Process, including intake. The Parties may select whomever they wish to serve as their Advisor as long as the Advisor is eligible and available.[15]

At the final stages of the Formal Resolution Process the Coordinator will offer to assign a trained attorney Advisor to any party. Any party has the right to refuse the University's Advisor, and use a different Advisor of their choosing.

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

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

Suffolk University fully respects and accords the Weingarten rights of employees, meaning that for Parties who are entitled to union representation, Suffolk University will allow the unionized employee to have their union representative (if requested by the party) as their Advisor of choice present for all resolution-related meetings and interviews.

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

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

[15] *"Available" means the party cannot insist on an Advisor who simply doesn't have inclination, time, or availability. Also, the Advisor cannot have institutionally conflicting roles, such as being a Coordinator who has an active role in the matter, or a supervisor who must monitor and implement sanctions. Additionally, choosing an Advisor who is also a witness in the process creates potential for bias and conflicts of interest. A party who chooses an Advisor who is also a witness can anticipate that issues of potential bias will be explored by the Decision-maker(s).*

B. Records Shared with Advisors

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

Advisors are expected to maintain the confidentiality of the records Suffolk University shares with them, **Section 14 of the Policy addressing Confidentiality**. Advisors may not disclose any Suffolk University work product or evidence Suffolk University obtained solely through the Resolution Process for any purpose not explicitly authorized by Suffolk University.

Suffolk University may restrict or remove any Advisor who does not respect the sensitive nature of the process or who fails to abide by Suffolk University 's confidentiality expectations.

C. Advisor Expectations

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

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

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

D. Advisor Policy Violations

Any Advisor who oversteps their role as defined by the Policy, who shares information or evidence in a manner inconsistent with the Policy, or who refuses to comply with Suffolk University 's established rules of decorum, will be warned. If the Advisor continues to disrupt or otherwise fails to respect the limits of the Advisor role, the meeting/interview[/hearing] may be ended, or other appropriate measures implemented, including Suffolk University requiring the party to use a different Advisor or providing a different Suffolk University -appointed Advisor. Subsequently, the Coordinator will determine how to address the Advisor's non-compliance and future role.

Resolution Option Overview – Informal Resolution vs. Formal Resolution

This Resolution Process, consisting of Informal Resolution and Formal Resolution s Suffolk University 's chosen approach to addressing all forms of discrimination on the basis of protected characteristics, harassment, and retaliation. The process considers the Parties' preferences but is ultimately determined at the Coordinator's discretion.

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

A. Informal Resolution

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

The parties may receive as part of an Informal Resolution Process, a written notice that explains:

- The allegations;
- The requirements of the Informal Resolution process;
- That, prior to agreeing to a resolution, any party has the right to withdraw from the Informal Resolution process and to initiate or resume Suffolk University 's Formal Resolution Process;
- That the Parties' agreement to a resolution at the conclusion of the Informal Resolution process will preclude the Parties from initiating or resuming the resolution process arising from the same allegations;
- The potential terms that may be requested or offered in an Informal Resolution agreement, including notification that an Informal Resolution agreement is binding only on the Parties; and
- What information Suffolk University will maintain, and whether and how it could disclose such information for use in its Resolution Process.

Suffolk University offers four categories of Informal Resolution:

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

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

2. Educational Conversation. When the Coordinator can resolve the matter informally by having a conversation with the Respondent to discuss the Complainant's concerns and institutional expectations or can accompany the Complainant in their desire to confront the conduct.

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

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

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

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

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

When a resolution is reached, the appropriate sanction(s) or responsive actions are promptly implemented to effectively stop the harassment or discrimination, prevent its recurrence, and

remedy the effects of the discriminatory conduct, both on the Complainant and the community.

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

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

- The Parties' amenability to Alternative Resolution.
- Likelihood of potential resolution, considering any power dynamics between the Parties.
- The nature and severity of the alleged misconduct.
- The Parties' motivation to participate.
- Civility of the Parties.
- Results of a violence risk assessment/ongoing threat analysis.
- Respondent's disciplinary history.
- Whether an emergency removal or other interim action is needed.
- Skill of the Alternative Resolution facilitator with this type of Complaint.
- Complaint complexity.
- Emotional investment/capability of the Parties.
- Rationality of the Parties.
- Goals of the Parties.
- Adequate resources to invest in Alternative Resolution (e.g., time, staff, etc.).

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

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

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

These four categories reflect the flexibility of the informal resolution process; note that an informal resolution may be reached using some or all of the four methods above. The individual facilitating an Informal Resolution must be trained and cannot be the Investigator, Decision-maker, or Appeal Decision-maker.

It is not necessary to pursue Informal Resolution first in order to pursue a Formal Resolution Process. Any party participating in Informal Resolution can withdraw from the Informal Resolution Process at any time and initiate or resume the Formal Resolution Process.

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

Formal Resolution Process

A. Notice of Investigation and Allegations

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

The NOIA typically includes:

- A meaningful summary of all allegations.
- The identity of the involved Parties (if known).
- The precise misconduct being alleged.
- The date and location of the alleged incident(s) (if known).
- The specific policies/offenses implicated.
- A description of, link to, or copy of the applicable procedures.
- A statement that the Parties are entitled to an equal opportunity to access the relevant and not otherwise impermissible evidence.
- The name(s) of the Investigator(s), along with a process to identify to the Coordinator, in advance of the interview process, any conflict of interest that the Investigator(s) may have.
- A statement that Suffolk University presumes the Respondent is not responsible for the reported misconduct unless and until the evidence supports a different determination.
- A statement that determinations of responsibility are made at the conclusion of the process and that the Parties will be given an opportunity during the review and comment period to inspect and review all relevant evidence.
- A statement that retaliation is prohibited.
- Information about the confidentiality of the process, including that the Parties and their Advisors (if applicable) may not share Suffolk University work product obtained through the Resolution Process.
- A statement that the Parties may have an Advisor of their choice who may accompany

them through all steps of the Resolution Process.

- A statement informing the Parties that Suffolk University 's Policy prohibits knowingly making false statements, including knowingly submitting false information during the Resolution Process.
- Detail on how a party may request disability accommodations during the Resolution Process.
- A link to Suffolk University 's VAWA Brochure.
- An instruction to preserve any evidence that is directly related to the allegations,
- A statement that Parties who are members of a union are entitled to union representation throughout the process.

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

Resolution Timeline

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

Investigations are completed expeditiously although some investigations may take longer, depending on issues such as the nature, extent, and complexity of the allegations, witness availability, law enforcement involvement, and other factors.

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

Ensuring Impartiality

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

The Coordinator will vet the assigned Investigator(s), Decision-maker(s), and Appeals officers for impartiality by ensuring there are no actual or apparent conflicts of interest or disqualifying biases. At any time during the Resolution Process, the Parties may raise a concern regarding bias or conflict of interest, and the Coordinator will determine whether the concern is reasonable and supportable. If so, another individual will be assigned, and the impact of the bias or conflict, if any, will be remedied. If the source of the conflict of interest or bias is the Coordinator, concerns

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

Investigator Appointment

Once an investigation is initiated, the Coordinator appoints an Investigator(s) to conduct it. These Investigators will be properly trained as determined by the Title IX Coordinator, whether internal or external to the Suffolk University's community.

Witness Role and Participation in the Investigation

Employee witnesses (not including Complainant and Respondent) are required to cooperate with and participate in Suffolk University 's investigation and Resolution Process. Student witnesses are expected to cooperate with the investigation and may face Student Conduct sanctions for refusal to participate. Witnesses from outside Suffolk University community cannot be required to participate but are encouraged to cooperate with Suffolk University investigations and to share what they know about a Complaint.

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

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

Interviews

It is standard practice for Investigators to create a record of all interviews pertaining to the Resolution Process (other than Informal Resolution meetings). The Parties may request to review the substance of their own interviews. No unauthorized audio or video recording of any kind is permitted during investigation meetings. If an Investigator(s) elects to audio and/or video record interviews, all involved individuals should be made aware of audio and/or video recording, and these recordings, if made, will be provided to the Parties for their review.

Evidentiary Considerations

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

Relevant evidence is that which may aid in determining whether the allegation occurred, or whether the behavior constitutes a violation of Policy.
Impermissible evidence is defined as evidence that relates to the Complainant's sexual interests or prior sexual conduct, unless 1) evidence about the Complainant's prior sexual conduct is offered to prove that someone other than the Respondent committed the alleged conduct, or 2) is evidence about specific incidents of the Complainant's prior sexual conduct with the Respondent that is offered to prove consent.

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

Prior Bad Acts

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

Character Evidence

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

Respondent Admits Responsibility

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

Investigation Under Formal Resolution Process

All investigations are adequate, thorough, reliable, impartial, prompt, and fair. They involve interviews with all relevant Parties and witnesses, obtaining relevant evidence, and identifying sources of expert information, as necessary.

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

Suffolk University may consolidate Complaints against more than one Respondent, or by more

than one Complainant against one or more Respondents, when the allegations arise from the same facts or circumstances or implicate a pattern, collusion, and/or other shared or similar actions.
The Investigator(s) typically take(s) the following steps, if not already completed and not necessarily in this order:

- Determine the identity and contact information of the Complainant.
- Assist the Coordinator, if needed, with conducting a prompt initial evaluation to determine if the allegations indicate a potential Policy violation.
- Work with the Coordinator, as necessary, to prepare the initial Notice of Investigation and Allegations (NOIA). The NOIA may be amended with any additional or dismissed allegations.
- Commence a thorough, reliable, and impartial investigation. When participation of a party is expected, provide that party with written notification of the date, time, and location of the meeting, as well as the expected participants and purpose.
- Make good faith efforts to notify each party of any meeting or interview involving another party, in advance when possible. Interview the Complainant and the Respondent and conduct follow-up interviews with each, as necessary.
- Interview all available, relevant witnesses and conduct follow-up interviews as necessary.
- Provide each interviewed party an opportunity to review and verify the Investigator's summary notes (or transcript or recording) of the relevant evidence/testimony from their respective interviews and meetings.
- Allow each party the opportunity to suggest witnesses and questions they wish the Investigator(s) to ask of another party and/or witnesses. Document in the investigation report which questions were asked, with a rationale for any changes or omissions.
- Where possible, complete the investigation promptly and without unreasonable deviation from the intended timeline.
- Provide the Parties with regular status updates throughout the investigation.
- The Parties and their respective Advisors will be notified of all witnesses whose information will be used to render a finding.
- Allow the Parties to submit questions they would like asked of the other party or any witnesses. The Investigator will ask those questions deemed relevant, and for any question deemed not relevant, will provide a rationale for not asking the question.
- Write a draft investigation report that gathers, assesses, and synthesizes the evidence, accurately summarizes the investigation, and party and witness interviews, and provides all relevant evidence. Review the final written draft with the parties to ensure the accuracy of the draft.
- The Investigator will submit the final draft report to the Nondiscrimination Coordinator, and an assessment of whether the facts satisfy or do not satisfy each element of each charge, and the credibility of the parties and witnesses. The Title IX Coordinator may accept the draft as final, or return the draft for further investigation if deemed necessary by the Coordinator.
- The Coordinator will assign Advisors to the parties and the Investigator or the Coordinator will provide the Parties and their respective Advisors an electronic copy of the draft investigation report as well as an opportunity to inspect and review all relevant evidence obtained as part of the investigation for a review and comment period of ten (10) business days so that each party may meaningfully respond to the evidence. The Parties may elect

to waive all or part of the review period.
- The report may be shared with legal counsel for their review and feedback.

Decision-Maker Review Under Formal Resolution Process

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

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

Investigator-led Questioning Meetings

The Coordinator provides the Draft Investigation Report to the Decision-maker and the Parties and their Advisors simultaneously for review.

- The Decision-maker can then provide the Investigator with a list of relevant questions to ask the Parties or any witnesses.
  - To the extent credibility is in dispute and relevant to one or more of the allegations, the questions provided by the Decision-maker may also explore credibility.
- The Investigator will also ask each of the Parties to provide a proposed written list of questions to ask the other Parties and any witnesses.
  - To the extent credibility is in dispute and relevant to one or more of the allegations, questions proposed by the Parties may also explore credibility.
  - All party questions must be posed during this phase of the process and cannot be posed later unless authorized by the Decision-maker.
  - The Investigator will share all party-proposed questions with the Decision-maker, who will finalize the list with the Investigator to ensure all questions are both relevant and permissible. The parties may be notified of the Decision-maker's final list of permissible questions, prior to the individual meetings between the Investigator and the parties.
- The Investigator will then hold individual meetings with the Parties and witnesses to ask the questions posed by the Decision-maker,[16] as well as the questions proposed by the Parties that have been deemed relevant and not duplicative, including questions intended to assess credibility. These meetings will be recorded and transcribed.
  - For any question deemed not relevant or duplicative, if not provided previously by the Decision-maker, the Investigator will provide the Decision-Maker's rationale for not asking the question, either during the recorded meeting, or in writing (typically as an Appendix to the report).
- Typically, within three (3) business days of the last of these meetings, the recordings or transcripts of them will be provided to the Parties for their review. The Parties will then have five (5) business days to review these recordings or transcripts and propose follow-up questions to be asked by the Investigator.
- The Investigator will review the proposed questions with the Decision-maker, to determine

relevance and permissibility. If deemed necessary, the Investigator will then meet individually with the Parties or witnesses for whom there are relevant, and not duplicative, follow-up questions. These follow-up meetings will also be recorded, and the Parties will receive the recordings or transcripts of these meetings. This final round of questioning is the last such round permitted, unless leave is granted to extend, by the Decision-maker.

- The Investigator will then incorporate any new, relevant evidence and information obtained through the Parties' review of the Draft Investigation Report, the questioning, and follow-up meetings into a Final Investigation Report.
- The Investigator will then share the investigation report with the Coordinator. The report may also be shared with legal counsel if necessary.
- The Final Investigation Report and investigation file will then be provided to the Coordinator.

[16]*The Decision-maker is permitted but not required to attend this meeting; this decision is at the discretion of the Nondiscrimination Coordinator, in consultation with the Investigator and the DM.*

Decision-Maker Determination Under Formal Resolution Process

- The Coordinator will provide the Decision-maker access to the Final Investigation Report and investigation file, including the evidence and information obtained through the Investigator-led questioning meetings.
- The Decision-maker will review the Final Investigation Report, all appendices, and the investigation file.
- If the record is incomplete, the Decision-maker may direct a re-opening of the investigation, or may direct or conduct any additional inquiry necessary, including informally meeting with the Parties or any witnesses, if needed.
- Upon reviewing the relevant evidence, the Decision-maker may also choose to pose additional questions:
  - To the extent credibility is in dispute and relevant to one or more of the allegations, the Decision-maker may meet individually with the Parties and witnesses to question them in order to assess their credibility. These meetings will be recorded and shared with the Parties.
  - At their discretion, the Decision-maker may also meet with any party or witness to ask additional relevant questions that will aid the Decision-maker in making their findings. These meetings will be recorded and shared with the Parties.
- The Decision-maker will then apply the preponderance of the evidence standard to make a determination on each of the allegations and, if applicable, any sanctions.
- **Timeline**. The Decision-maker's determination process typically takes approximately ten (10) business days, but this timeframe can vary based on a number of factors and variables. The Parties will be notified of any delays.
- **Impact Statements**. Prior to a determination, the Coordinator will also provide the Parties an opportunity to submit a written impact and/or mitigation statement. The Coordinator will review these statements upon receipt to determine whether there are any immediate needs, issues, or concerns, but will otherwise hold them until after the Decision-maker has made determinations on the allegations. If there are any findings of a Policy violation, the

Decision-maker will request the Impact Statements from the Coordinator and review them prior to determining sanctions. They will also be exchanged between the Parties at that time.

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

Sanctioning Factors

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

- The nature, severity of, and circumstances surrounding the violation(s).
- The Respondent's disciplinary history.
- The need for sanctions/responsive actions to bring an end to the discrimination, harassment, and/or retaliation.
- The need for sanctions/responsive actions to prevent the future recurrence of discrimination, harassment, and/or retaliation.
- The need to remedy the effects of the discrimination, harassment, and/or retaliation on the Complainant and the community.
- The impact on the Parties.
- Any other information deemed relevant by the Decision-maker(s).

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

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

Notice of Outcome

Within ten (10) business days of the Decision-Makers final determination and the conclusion of the Formal Resolution Process, the Coordinator provides the Parties with a written outcome notification. The outcome notification and the Decision Makers rationale for each alleged Policy violation, as well as any applicable sanctions, will be shared with the parties.

The notification will also detail the Parties' equal rights to appeal, the grounds for appeal, the steps to take to request an appeal, and when the determination is considered final if neither party appeals.

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

Withdrawal or Resignation Before Complaint Resolution

Students

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

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

When a student withdraws or leaves while the process is pending, the student may not return to Suffolk University in any capacity until the Complaint is resolved and any sanctions imposed are satisfied. If the student indicates they will not return, the Coordinator has discretion to dismiss the Complaint. The Registrar and Office of Admissions will be notified, accordingly.

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

Employees

Should an employee Respondent decide not to participate in the Resolution Process, the process proceeds absent their participation to a reasonable resolution.

If a student employee Respondent withdraws from Suffolk University with unresolved allegations pending, the Resolution Process may continue, or Coordinator may exercise their discretion to dismiss the Complaint. If the Complaint is dismissed, Suffolk University may still provide reasonable supportive or remedial measures as deemed necessary to address safety and/or remedy any ongoing effects of the alleged discrimination, harassment, and/or retaliation.

When an employee respondent resigns and the Complaint is dismissed, the employee may not return to Suffolk University in any capacity. Human resources, the registrar, and admissions will be notified, accordingly, and a note will be placed in the employee's file that they resigned with allegations pending and are not eligible for academic admission or rehire with Suffolk University. The records retained by the Coordinator will reflect that status.

Appeal of the Determination

The Coordinator will designate a single, trained Appeal Decision-maker that is internal or external, to hear the appeal. No Appeal Decision-maker(s) will have been previously involved in the Resolution Process for the Complaint, including in any supportive measure or dismissal appeal that may have been heard earlier in the process.

Advisors present during the preceding process will be notified of appeals and appellate decisions. Advisors are permitted but not required to assist during any party appeal; the University will not appoint Advisors for appellate purposes.

A. Appeal Grounds

Appeals are limited to the following grounds:

A procedural irregularity that would change the outcome

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

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

B. Request for Appeal

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

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

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

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

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

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

such responses will be circulated for review and comment by all Parties. If denied, the Parties will be notified accordingly, in writing.

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

C. Appeal Determination Process

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

Appeal decisions are to be deferential to the original determination, making changes to the finding only when there is clear error and a compelling justification to do so. All decisions apply the preponderance of the evidence standard.

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

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

D. Appeal Outcome

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

A Notice of Appeal Outcome letter will be sent to all Parties simultaneously, or without significant time delay between notifications. The Appeal Outcome will specify the finding on each ground for appeal, any specific instructions for remand or reconsideration, and the rationale supporting the essential findings.

Written notification may be delivered by one or more of the following methods: in person, mailed to the local or permanent address of the Parties as indicated in official institutional records, or emailed to the Parties' Suffolk University-issued email or otherwise approved account. Once mailed, emailed, and/or received in person, the Appeal Outcome will be presumptively delivered. Once an appeal is decided, the outcome is final and constitutes the Final Determination; further appeals are not permitted, even if a decision or sanction is changed on remand (except in the case

of a new determination). When appeals result in no change to the finding, that decision is final. When an appeal results in a new finding or, that finding can be appealed one final time on the grounds listed above and in accordance with these procedures.

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

E. Sanction Status During the Appeal

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

Long-Term Remedies/Other Actions

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

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

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

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

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

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

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

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

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

Accommodations and Support During the Resolution Process

Disability Accommodations

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

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

Other Support

Suffolk University will also address reasonable requests for support for the Parties and witnesses, including:

- Language services/Interpreters.
- Access and training regarding use of technology throughout the Resolution Process.
- Other support as deemed reasonable and necessary to facilitate participation in the Resolution Process.

Revisions of These Procedures

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

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

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

These procedures are effective August 1, 2024.

APPENDIX A: Definitions

The following definitions apply to the Nondiscrimination Policy[17]:

[17]*Expanded definitions of terms may be found within the relevant portions of the full Nondiscrimination Policy.*

- **Advisor**. Any person chosen by a party, or appointed by the institution, who may accompany the party to all meetings related to the Resolution Process and advise the party on that process. Advisors will be appointed for all parties participating in a formal resolution.
- **Affirmative Consent** is consent which must be informed, voluntary, and active, meaning that, through the demonstration of clear words or actions, a person has indicated permission to engage in mutually agreed –upon sexual activity. Whoever initiates sex has the responsibility to ask for and receive permission. Participants are encouraged to talk to one another before engaging in sexual activity to avoid a misunderstanding.
- **Amnesty**: The University community encourages the reporting of misconduct and crimes by Complainants and witnesses. To encourage reporting and participation in the process, the University maintains a policy of offering parties and witnesses amnesty from minor policy violations – such as consumption of alcohol or the use of illicit drugs if related to a Title IX incident. A party or witness who files a report will not be subject to sanctions/disciplinary action by the University for their improper use of alcohol or drugs, unless the use of alcohol or drugs was done in furtherance of the sexual misconduct act, such as causing someone to consume an intoxicant without the recipient's knowledge and consent. Students and employees, whether as parties to the proceedings or as witnesses, are expected to provide truthful testimony.
- **Bias** is a broad category of behaviors that demean or intimidate individuals or groups because of personal characteristics, beliefs, or expressions. Bias incidents may be acts committed against a person or group that are motivated in whole or in part by prejudice against the person's or group's sex, gender identity, sexual orientation, national origin, race, religion, disability, veteran status or other groups. Some expressions of an idea or point of view may be offensive or inflammatory, however, not all acts of expression violate the University nondiscrimination policy or other policies. The University values freedom of expression and the open exchange of ideas, and the expression of controversial ideas and differing views is a vital part of the University's mission.
- **Coordinator**. The person(s) with primary responsibility for overseeing and enforcing the Nondiscrimination Policy. As used in these policies and procedures, the "Coordinator" also includes their designee(s).
- **Appeal Decision-maker**. The person who accepts or rejects a submitted appeal request, determines whether any of the grounds for appeal are met, and directs responsive action(s), accordingly.

- **Complainant**. A student or employee who is alleged to have been subjected to conduct that could constitute discrimination, harassment, or retaliation under the Policy; or a person other than a student or employee who is alleged to have been subjected to conduct that could constitute discrimination or harassment or under the Policy and who was participating or attempting to participate in Suffolk University 's education program or activity at the time of the alleged discrimination, harassment or retaliation.
- **Complaint**. An oral or written request to Suffolk University that can objectively be understood as a request for Suffolk University to investigate and make a determination about the alleged Policy violation(s).
- **Confidential Resource Provider** means an employee who is not a Mandated Reporter of notice of harassment, discrimination, and/or retaliation (irrespective of Clery Act Campus Security Authority status).
- **Confidential Employee**
  - An employee whose communications are privileged or confidential under federal or state law. The employee's confidential status, for purposes of this definition, is only with respect to information received while the employee is functioning within the scope of their duties to which privilege or confidentiality applies; or
  - An employee whom Suffolk University has designated as confidential under this Policy for the purpose of providing services to persons related to discrimination, harassment, or retaliation. If the employee also has a duty not associated with providing those services, the employee's confidential status only applies with respect to information received about discrimination, harassment, or retaliation in connection with providing those services; or
  - An employee who is conducting an Institutional Review Board-approved human-subjects research study designed to gather information about discrimination, harassment, or retaliation. The employee's confidential status only applies with respect to information received while conducting the study.
- **Day**. A business day when Suffolk University is in normal operation. All references in the Policy to days refer to business days unless specifically noted as calendar days.
- **Decision-maker**. The person who hears evidence, determines relevance, and makes the Final Determination of whether Policy has been violated and/or assigns sanctions.
- **Discrimination** is conduct that is based upon an individual's race, color, national or ethnic origin, religion, sex, age, disability, sexual orientation, gender identity, gender expression, genetic information, pregnancy or parenting status, military or veteran status or any other characteristic protected under applicable federal or state law.
- **Education Program or Activity**. Locations, events, or circumstances where Suffolk University exercises substantial control over the context in which the discrimination, harassment, and/or retaliation occurs and also includes any building owned or controlled by a student organization that Suffolk University officially recognizes.
- **Employee**. A person employed by Suffolk University either full- or part-time, including student employees when acting within the scope of their employment.
- **Final Determination**. A conclusion by the standard of proof that the alleged conduct did or did not violate Policy.
- **Finding**. A conclusion by the standard of proof that the conduct did or did not occur as alleged (as in a "finding of fact").
- **Informal Resolution**. A resolution agreed to by the Parties and approved by the

Coordinator that occurs prior to a Final Determination in the Formal Resolution Process.

- **Formal Resolution** is a method of formal resolution designated by the University to address conduct that falls within the policies included below, and which complies with the requirements of 34 CFR Part 106.45 and 106.46.
- **Hostile Environment**
  - An environment can become hostile when, unwelcome conduct or harassment is based on a protected class such as race, sex, pregnancy, religion, national origin, age, disability, or shared ancestry. Hostile environment harassment is continued and long-lasting, and severe enough that it denies a person's ability to participate in or benefit from Suffolk University's employment, educational program, employment, or activity.
  - **Sex-based hostile environment under Title IX** requires unwelcome sex-based conduct unwelcome sex-based conduct, that based on the totality of the circumstances, is subjectively and objectively offensive, and is so severe or pervasive, that it limits or denies a person's ability to participate in or benefit from Suffolk University 's education program, employment or activity.
- **Investigation Report**. The Investigator's summary of all relevant evidence gathered during the investigation. Variations include the Draft Investigation Report and the Final Investigation Report.
- **Investigator**. The person(s) authorized by Suffolk University to gather facts about an alleged violation of this Policy, assess relevance and credibility, synthesize the evidence, and compile this information into an Investigation Report. The Investigator may be a university employee or may be retained from an outside organization by the University. All Investigators will be trained in investigations pursuant to Title IX requirements.
- **Knowledge**. When Suffolk University receives Notice of conduct that reasonably may constitute harassment, discrimination, or retaliation in its Education Program or Activity.
- **Mandated Reporter**.[18,19] A Suffolk University employee who is obligated by Policy to share Knowledge, Notice, and/or reports of discrimination, harassment, and/or retaliation with the Coordinator.

[18]*Not to be confused with those mandated by state law to report child abuse, elder abuse, and/or abuse of persons with disabilities to appropriate officials, though these responsibilities may overlap with those who have mandated reporting responsibility under this Policy.*
[19]*The Coordinator designated to receive information from Mandated Reporters may vary depending upon the type of alleged discrimination, harassment, or retaliation (e.g., on the basis of sex, on the basis of race, on the basis of disability).*

- **No Contact Order** is a non-punitive supportive measure where the University campus police, Student Affairs or Title IX Coordinator prohibits a student, employee or third party from contacting another student, employee, or third party.
- **Notice.** When an employee, student, or third party informs the Coordinator of the alleged occurrence of discriminatory, harassing, and/or retaliatory conduct.
- **Official with Authority (OWA)** means an employee of the University explicitly vested with the responsibility to implement corrective measures for harassment, discrimination, and/or retaliation on behalf of the University.
- **Parties**. The Complainant(s) and Respondent(s), collectively.
- **Pregnancy or Related Conditions**. Pregnancy, childbirth, termination of pregnancy, or

lactation, medical conditions related thereto, or recovery therefrom.

- **Protected Characteristic**. Any characteristic for which a person is afforded protection against discrimination and harassment by law or Suffolk University Policy.
- **Protective Order**: An order of protection (Restraining Order and/or Harassment Order) issued by a court to limit the behavior of someone who harms or threatens to harm another person. It is used to address various types of safety issues, including, but not limited to situations involving sexual assault, dating violence, domestic violence, or stalking.
- **Relevant Evidence**. Evidence that may aid a Decision-maker in determining whether the alleged discrimination, harassment, or retaliation occurred, or in determining the credibility of the Parties or witnesses.
- **Remedies**. Typically, post-resolution actions directed to the Complainant and/or the community as mechanisms to address safety, prevent recurrence, and restore or preserve equal access to Suffolk University 's Education Program and Activity.
- **Resolution Process**. The investigation and resolution of allegations of prohibited conduct under this Policy, including Informal Resolution, Administrative Resolution, and/or Hearing Resolution
- **Respondent**. A person who is alleged to have engaged in conduct that could constitute discrimination based on a protected characteristic, harassment, or retaliation for engaging in a protected activity under this Policy. A Respondent may be a student, employee, or student organization.
- **Sanction**. A consequence imposed on a Respondent who is found to have violated this Policy.
- **Sex**. Sex assigned at birth, sex stereotypes, sex characteristics, pregnancy or related conditions, sexual orientation, and gender identity.
- **Standard of Proof** is used in resolving complaints pursuant to the Nondiscrimination Policy. The University will use a "preponderance of the evidence," standard, which is whether the evidence gathered and information provided during the investigation supports a finding that it is more likely than not that the Respondent violated the Nondiscrimination policy.
- **Student** is defined for the purpose of this policy as any individual who has accepted an offer of admission, or who is registered or enrolled for credit or non-credit bearing coursework, and who maintains an ongoing relationship with the University.
- **Supportive Measures** are non-disciplinary, non-punitive individualized services offered as appropriate, as reasonably available, and without fee or charge to the complainant or the respondent before or after the filing of a formal complaint or where no formal complaint has been filed. Supportive measures may include counseling, extensions of deadlines or other course related adjustments; modifications of work or class schedules; campus escort services; mutual restrictions on contact between the parties; changes in work or housing locations; leaves of absence; increased security and monitoring of certain areas of the campus; and other similar measures.
- **Title IX** is a comprehensive federal law that prohibits discrimination on the basis of sex in any federally funded education program or activity. On June 23, 1972, the President signed Title IX of the Education Amendments of 1972, 20 U.S.C. Â§1681 et seq., into law. The principal objective of Title IX is to avoid the use of federal money to support sex discrimination in education programs and to provide individual citizens effective protection against those practices.

- **Title IX Coordinator** is the official administrator identified by the University to monitor compliance; ensure and coordinate education and training; coordinate the investigation, response, and resolution of all Title IX reports under the Nondiscrimination policies; and ensure appropriate actions to eliminate, prevent its recurrence, address its effect on persons and the Community as a whole. The University has identified the Director of Title IX & Clery Act Compliance in this role:

  Catherine LaRaia, Director of Title IX & Clery Act Compliance
  73 Tremont Street, 13th floor
  617-573-8027
  Email **Catherine LaRaia**
  Title IX at Suffolk on the Web

APPENDIX B: Privacy, Privilege, and Confidentiality

For the purpose of this Policy, the terms privacy, confidentiality, and privilege have distinct meanings.

- **Privacy**. Means that information related to a complaint will be shared with a limited number of Suffolk University employees who "need to know" in order to assist in providing supportive measures or evaluating, investigating, or resolving the Complaint. All employees who are involved in Suffolk University 's response to Notice under this Policy receive specific training and guidance about sharing and safeguarding private information in accordance with federal and state law.
- **Confidentiality**. Exists in the context of laws or professional ethics (including Title IX) that protect certain relationships, including clinical care, mental health providers, and counselors. Confidentiality also applies to those designated by Suffolk University as Confidential Employees for purposes of reports under this Policy, regardless of legal or ethical protections. When a Complainant shares information with a Confidential Employee, the Confidential Employee does not need to disclose that information to the Title IX Coordinator. The Confidential Resource will, however, provide the Complainant with the Title IX Coordinator's contact information, assist the Complainant in reporting, if desired, and provide them with information on how the office can assist them. With respect to Confidential Employees, information may be disclosed when: (1) the reporting person gives written consent for its disclosure; (2) there is a concern that the person will likely cause serious physical harm to self or others; or (3) the information concerns conduct involving suspected abuse or neglect of a minor under the age of 18, elders, or persons with disabilities. Non-identifiable information may be shared by Confidential Employees for statistical tracking purposes as required by the Clery Act/Violence Against Women Act (VAWA). Other information may be shared as required by law.
- **Privilege**. Exists in the context of laws that protect certain relationships, including attorneys, spouses, and clergy. Privilege is maintained by a provider unless a court orders release or the holder of the privilege (e.g., a client, spouse, parishioner) waives the protections of the privilege. Suffolk University treats employees who have the ability to have privileged communications as Confidential Employees.

Suffolk University reserves the right to determine which Suffolk University officials have a legitimate educational interest in being informed about student-related incidents that fall under this Policy, pursuant to FERPA.

Only a small group of officials who need to know will typically be told about the Complaint. Information will be shared as necessary with Investigators, Decision-makers, Appeal Decision-makers, witnesses, the Parties, and the Parties' Advisors. The circle of people with this knowledge will be kept as tight as possible to preserve the Parties' rights and privacy, and release is governed by the institution's unauthorized disclosure policy.

Suffolk University may contact students' parents/guardians to inform them of situations in which there is a significant and articulable health and/or safety risk but will usually consult with the student prior to doing so.

APPENDIX C: Sanctions

1. Students and Student Organizations Sanctions

- When a student has been found responsible for a violation of the University's Nondiscrimination Policy, any of the following sanctions may be imposed by the University. The list below is not intended to be exhaustive and the University reserves the right to impose one or more sanctions for a single violation or impose other sanctions instead of or in addition to those specified below. In addition, a responsible finding may result in forfeiture of all University scholarships, financial aid, or monies paid. When a finding of responsibility has been made and sanctions assigned it will be noted on the student transcript.
- **Warning**: A notice, either verbal or written, that the student is violating or has violated University regulations, must cease the conduct immediately, and that continuation or repetition of wrongful conduct may be cause for more severe disciplinary action.
- **Private Reprimand**: A notice, either verbal and/or written, directly to the student that the student has violated University regulations.
- **Parental Notification**: The University reserves the right to notify parents/guardians regarding any serious health or safety risk, and when students under the age of 21 have been found responsible for violating the University's alcohol or other drug policies.
- **Loss of Privileges**: Denial of specified University and/or Residence Life & Housing or other privileges for a designated period of time, which may include, but is not limited to, denial of access to any campus facility, activity, event, class, or program. This includes, but is not limited to, orders prohibiting the student from having contact with a member of the University Community. This also includes, but is not limited to, loss of privileges in the residence halls including but not limited to: guest privileges, early arrival/late stay status, vacation period housing, or removal from a floor, room, or building. Should residence hall space not be immediately available, relocation may take place at an arranged time.
- **Confiscation of Property**: Confiscation of items that the University determines are inappropriate for the University setting.
- **Restitution**: Compensation for loss, damage, or injury. This may take the form of

appropriate service or monetary or material replacement.

- **Educational Program or Project**: Required attendance at the student's expense at an educational workshop or completion of an educational project that will benefit the University community, responsible student, or others.
- **Referral**: A student may be referred to Counseling, Health and Wellness, Student Affairs, Center for Learning & Academic Success or another appropriate office or local agency for consultation or assessment.
- **Un-enrollment from a Course and/or Academic Program**: A student may be unenrolled from a course and/or an academic program. In such cases, tuition and fees for the course will not be refunded to the student.
- **No Contact Order/Directive**: An order that restricts communication/contact between two or more parties.
- **Disciplinary Probation**: A period of time during which a student's behavior is subject to examination.
- **Strict Disciplinary Probation**: A period of time during which a student's behavior is subject to close examination. In addition, the student may be excluded from participation in some or all social and/or extracurricular activities, including, but not limited to, representing the University, participating in intercollegiate athletics, holding elected or appointed office in the Student Government Association/Student Bar Association/Graduation Student Association or other student organization, or studying abroad.
- **Residence Relocation**: Required reassignment to another residence area.
- **Deferred Loss of Housing**: Warning that if the student is found responsible for violating the University's Sexual Misconduct and/or Nondiscrimination policies, the student may be immediately removed from the residence halls for a specific period of time, after which the student may reapply for housing.
- **Loss of Future Housing**: The student is prohibited from participating in the returning student housing lottery or from participating in the returning student waitlist until the date specified or indefinitely if no date is specified.
- **Residence Hall Suspension**: Separation of the student from the residence halls for a specific period of time, after which the student may reapply for housing. The student may not participate in the housing lottery for the following year or be on the housing waitlist while on Residence Hall Suspension. Reapplication for housing does not guarantee the student will receive on-campus housing. Conditions for returning to the residence halls may be specified.
- **Residence Hall Dismissal**: Permanent separation of the student from the residence halls.
- **Deferred University Suspension**: A warning that if the student is found responsible for violating the University's Sexual Misconduct and/or Nondiscrimination policies during a specific period of time, the student may be immediately suspended from the University for a specific period of time, after which the student may reapply. Conditions for return may be specified.
- **University Suspension**: Suspension of the student from the University for a specific period of time, after which the student may apply to return. Conditions for return may be specified. University Suspension is noted on the student's transcript.
- **Deferred University Dismissal**: Warning that if the student is found responsible for violating the University's Equal Opportunity, Harassment, and Nondiscrimination policy

the student may be immediately dismissed from the University.

- **Dismissal**: Permanent separation of the student from the University. University Dismissal is noted on the student's transcript.
- **Revocation of Admission or Degree**: Admission to the University or a degree awarded from the University may be revoked for fraud, misrepresentation, or violation of the University's Sexual Misconduct and/or Nondiscrimination policies or for other serious violations committed by a student prior to graduation.
- **Withholding of a Degree**: The University may withhold awarding a degree otherwise earned until the completion of the disciplinary process, including any investigation, including the completion of all sanctions imposed, if any.
- **Student Organization Recognition in Jeopardy**: A warning that if the student organization is found responsible for violating the Sexual Misconduct and/or Nondiscrimination policies during a specified period of time, the student organization's recognition may be immediately revoked.
- **Loss of Recognition**: During a specific period of time up to four years, a recognized student organization may not associate itself with the University by using the University name, facilities, or other rights and privileges of recognized student organizations, after which the organization may reapply for recognition. There is no guarantee re-recognition will be granted. If re-recognition is granted, conditions for re-recognition may be specified.

2. Employee Sanctions

Where an employee of the University violates the Nondiscrimination Policy discipline up to and including termination may be imposed.

When one of the parties in a formal resolution process is an employee, the Coordinator will notify Human Resources determine whether to refer violations of this provision to Human Resources for resolution, or to pursue resolution under this Policy, based on the circumstances of the allegation.

SUFFOLK UNIVERSITY RELATIONSHIP VIOLENCE RESPONSE PROCEDURES

If a student or employee reports that he or she is the victim of domestic violence, dating violence, sexual assault, or stalking – regardless of where the offense occurred – the University will respond as follows:

Domestic Violence

- The University will assess the immediate safety needs of the complainant.
- The University will provide the complainant with a written explanation of the complainant's rights and options, ***including the right to decline to notify police or campus authorities.***
- The University will provide written information to the complainant on how to apply for an Abuse Prevention Order.
- The University will issue a "Notice of Trespass" to the accused party, if appropriate.
- The University will provide the complainant with a written list of on-campus and off-campus resources.
- The University will assist the complainant with contacting local law enforcement if the

complainant wishes and will provide the complainant with contact information for local law enforcement.

- The University will provide written information to the complainant on how to preserve evidence.
- The University will assess the need to implement interim or long-term protective measures to protect the complainant, if appropriate.
- The University prohibits retaliation by any student or employee against a person who exercises his or her rights or responsibilities under any provision of the Campus SaVE Act and will take immediate and separate action against any person who retaliates.

Dating Violence

- The University will assess the immediate safety needs of the complainant.
- The University will provide the complainant with a written explanation of the complainant's rights and options, ***including the right to decline to notify police or campus authorities.***
- The University will provide written information to the complainant on how to apply for an Abuse Prevention Order.
- The University will issue a "Notice of Trespass" to the accused party, if appropriate.
- The University will provide the complainant with a written list of on-campus and off-campus resources.
- The University will assist the complainant with contacting local law enforcement if the complainant wishes and will provide the complainant with contact information for local law enforcement.
- The University will provide written information to the complainant on how to preserve evidence.
- The University will assess the need to implement interim or long-term protective measures to protect the complainant, if appropriate.
- The University prohibits retaliation by any student or employee against a person who exercises his or her rights or responsibilities under any provision of the Campus SaVE Act and will take immediate and separate action against any person who retaliates.

Sexual Assault

- Depending on when the sexual assault is reported (immediate report vs. delayed report), the University will provide the complainant with access to medical care.
- The University will assess the immediate safety needs of the complainant.
- The University will assist the complainant with contacting local law enforcement if the complainant wishes and will provide the complainant with contact information for local law enforcement.
- The University will provide the complainant with referrals to on and off campus mental health providers.
- The University will provide the complainant with a written list of on and off campus sexual assault resources.
- The University will provide the complainant with a written explanation of the complainant's rights and options, ***including the right to decline to notify police or campus authorities.***
- The University will provide written information to the complainant on how to preserve

evidence.

- The University will provide written information to the complainant on how to apply for an Abuse Prevention Order or a Harassment Prevention Order.
- The University will assess the need to implement interim or long-term protective measures, such as housing changes, change in class schedule, and "No Contact" directives to both parties, in order to protect the complainant.
- The University will issue a "Notice of Trespass" to the accused party, if appropriate.
- The University will provide a copy of the **Nondiscrimination Policy and Grievance Procedures** to the complainant and inform the complainant regarding timeframes for the inquiry, investigation, and resolution.
- The University will inform the complainant of the outcome of the investigation, whether the accused will face administrative charges and the outcome of the hearing.
- The University prohibits retaliation by any student or employee against a person who exercises his or her rights or responsibilities under any provision of the Campus SaVE Act and will take immediate and separate action against any person who retaliates.

Stalking

- The University will assess the immediate safety needs of the complainant.
- The University will assist the complainant with contacting local law enforcement if the complainant wishes and will provide the complainant with contact information for local law enforcement.
- The University will provide written information to the complainant on how to preserve evidence.
- The University will provide written information to the complainant on how to apply for an Abuse Prevention Order or a Harassment Prevention Order.
- The University will issue a "Notice of Trespass" to the accused party, if appropriate.
- The University will assess the need to implement interim or long-term protective measures to protect the complainant, if appropriate.

Response to Acts of Sexual Misconduct

The University will address the safety needs of the Suffolk community while protecting the survivor's right to privacy and ensuring the integrity of any police investigation, or University investigation and disciplinary action.

If it is determined that a reported incident of sexual assault or sexual misconduct represents a potential danger to the Suffolk Community, the Office of Title IX, in coordination with the Threat Assessment Team and with other partners will respond in a timely manner.

A potential danger to the Suffolk community includes the following:

- A pattern of sexual assaults, rapes or sexual misconduct incidents;
- A pattern of sexual assaults, rapes or sexual misconduct incidents that occur near the campus;
- A violent sexual assault, rape or sexual misconduct incident; or
- A gang sexual assault, rape or sexual misconduct incident.

If the Office of Title IX and SUPD find that a potential danger to the Suffolk University community exists, the University will issue a timely warning to the community and other steps may be taken to ensure public safety.

The Office of Title IX will partner with the following departments in a situation where there is a potential danger to the Suffolk University community. At all times the survivor's rights to privacy and anonymity will be followed:

- Title IX Office and any Deputy Title IX Officers
- Dean of Students for CAS, SBS, and law school
- Chief Human Resources Officer
- Chief of Suffolk University Police & Security Department (SUPD)
- Director of Counseling, Health and Wellness Center
- University Risk Manager
- University Emergency Manager

Other members of the Suffolk community, such as a representative from Residence Life and Housing and Public Affairs may be included as needed for a given set of circumstances.

Past Abuse

Many individuals experience sexual assault or sexual misconduct and never tell anyone at the time of the incident. If you were assaulted weeks or even years ago, assistance is still available. Talking with someone now may help you to cope better with abuse from the past, whether it was rape, child sexual abuse, incest, or sexual misconduct. Students may contact the **Counseling Center** for support at 617-573-8226 or the **Office of Title IX**.

ANTI HAZING POLICY & REPORTING

Policy Statement

Suffolk University is committed to the safety of our students, student organizations, faculty, staff, and visitors. An essential element to a safe campus is a strong, effective, anti-hazing program.

The University encourages all individuals who are the subject of potential hazing to pursue all legal remedies available to them, including reporting incidents of potential criminal conduct to law enforcement. If the conduct in question is alleged to be a violation of both University policy and the law, the University will proceed with its normal process, regardless of action or inaction by outside authorities.

Decisions made or sanctions imposed through these or other University procedures are not subject to change because criminal charges arising from the same conduct are dismissed, reduced, or rejected.

Through the promulgation, implementation, and enforcement of this Policy, the University complies with Mass. Gen. Laws Ch. 269, s. 17 and the Stop Campus Hazing Act. Pub. L. No. 118-173 (2024).

Prohibition Against Hazing

The University is committed to maintaining an environment of social responsibility that is free of harm, including hazing. Hazing is also against the law and Suffolk University recognizes the act of hazing as illegal, irresponsible, intolerable, and inconsistent with our community standards.

- Hazing activities can be committed against current, former, or prospective members of the community.
- Acts constitute hazing under this Policy regardless of the willingness of such other person(s) to participate in the activity or their actual or apparent consent to engage in the activity.

Hazing includes, but is not limited to behaviors that:

- Emphasize a power imbalance between new members and veterans of the group, club, or team that involve ridicule, embarrassment, and humiliation.
- Cause emotional anguish or physical discomfort that puts unnecessary stress upon the victims (e.g., verbal abuse, threats, sleep deprivation, confinement in spaces, exposure to elements, etc.).
- Have the potential to cause physical and/or emotional harm (e.g., beating, branding, excessive exercise, forced alcohol/food/drug consumption, extreme physical acts, sexual acts, etc.).
- Require someone to perform a task that violates any criminal law.

No policy can address all possible activities or situations that may constitute hazing. Whether a particular activity constitutes hazing will depend on the circumstances and context in which that activity is occurring in light of the above framework.

Suffolk University's Anti-Hazing Policy:

Hazing is prohibited and defined as:

Any intentional, knowing, or reckless act committed by a person (whether individually or in concert with other persons) against another person or persons regardless of the willingness of such other person or persons to participate, that:

- Is committed in the course of an initiation into, an affiliation with, or the maintenance of membership in, a student organization; and
- Causes or creates a risk, above the reasonable risk encountered in the course of participation in the institution of higher education or the organization (such as the physical preparation necessary for participation in an athletic team), of physical or psychological injury including:
    a. whipping, beating, striking, electronic shocking, placing of a harmful substance on someone's body, or similar activity;
    b. causing, coercing, or otherwise inducing sleep deprivation, exposure to the elements, confinement in a small space, extreme calisthenics, or other similar activity;

c. causing, coercing, or otherwise inducing another person to consume food, liquid, alcohol, drugs, or other substances;
d. causing, coercing, or otherwise inducing another person to perform sexual acts;
e. any activity that places another person in reasonable fear of bodily harm through the use of threatening words or conduct;
f. any activity against another person that includes a criminal violation of local, State, or Federal law; and
g. any activity that induces, causes, or requires another person to perform a duty or task that involves a criminal violation of local, State, Tribal, or Federal law.

Student Organization - An organization at Suffolk (including but not limited to social/ academic club, society, association, NCAA athletic team, club sports/intramural team, fraternity, sorority, band, or student government) in which two or more of the members are students enrolled at the institution of higher education, whether or not the organization is established or recognized by the institution.

Education and Training of Community Members (Prevention Programs)

To ensure that every Suffolk University community member has a foundational understanding of their role in promoting a safe environment that is free from hazing, minimum training outcomes include:

- Defining hazing and the range of hazing behaviors and scenarios;
- Identifying the types of harm and impact that can result from hazing activities;
- Differentiating healthy and unhealthy group behaviors and dynamics;
- Identifying activities that build group cohesion, sense of belonging, and support individual and leadership development without hazing;
- Developing skills to intervene in situations where hazing occurs or is likely to occur, including bystander intervention; and;
- Options for reporting allegations of hazing, including anonymous reporting options.

The University requires training on the above outcomes for all of new students, as well as for student-athletes, and club executive board leaders. Specifically:

- **New Students**: Incoming students will be required to complete training to gain a foundational understanding of recognizing, avoiding, and responding to hazing.
- **Athletes**: In addition to completing all-student training, athletes are required to participate in an annual, pre-season meeting with the athletic director and/or coaches that review the definitions of hazing, provides key examples, and works with student-athletes to develop activities that support team building and competitive success. Compliance will be tracked by the athletic director or their designee.
- **Student Club and Organizational Leaders**: In addition to completing all-student training, a minimum of two executive board members are required to participate in an annual Club and Organizational Leader training.

- **Fraternity and Sorority Members**: In addition to completing all-student training, a minimum of two executive board members are required to participate in an annual Fraternity and Sorority Member training.

Additionally, each year faculty and staff, including coaches, are required to participate in training and will receive the Hazing Policy to ensure they foster an environment that is free of hazing and promotes healthy group cohesion and development. Specifically:

- **Employees**: At the beginning of each academic year, all employees will receive a copy of the Hazing Policy and participate in a training that provides a foundational understanding of, recognizing, avoiding, and responding to hazing.
- **Coaching Employees**: Coaches will receive the same training as Employees. Additionally, all coaches are required annually to complete an online training administered by the U. S. Center for SafeSport that includes a module on hazing education and prevention.

Reporting Hazing Incidents

Students, faculty, staff, and student-athletes are encouraged to report hazing incidents. Reports can be made to Suffolk University Police (SUPD) by calling 617-573-8111 or to the Office of Student Affairs by submitting **an incident report**, which can be completed anonymously. *If necessary, obtain medical attention, and if you feel unsafe call SUPD immediately at 617-573-8111.*

Applicable Processes: Any member of the Suffolk University community who sponsors, operates or participates in a program either on or off campus including but not limited to, Students, student organizations, faculty, staff and volunteers who violate this policy section may be subject to the University's community standards processes.

Consequences for Violations: Sanctions for individuals and organizations found responsible for hazing include, but are not limited to:

- **Individuals:**
  - Probation, suspension, or dismissal from the university.
  - Removal from university-sponsored housing.
  - Loss of leadership roles within, or removal from, extra-curricular activities or teams.
  - Referral to law enforcement for potential criminal charges.
- **Organizations:**
  - Suspension or revocation of the organization's university recognition.
  - Loss of privileges (e.g., use of university facilities, participation in university events).

Annual Security Report/Hazing Date Report: The University will include hazing statistics in its annual Clery security report, detailing:

- The number of hazing incidents reported.
- The outcomes of investigations.
- Preventive measures taken.

Campus Hazing Transparency Report: The University will publish a Campus Hazing Transparency Report on its public website, summarizing findings concerning any student organization or athletic team found to be in violation of the university's standards of conduct related to hazing. The report will include:

- The name of the student organization or athletic team.
- A general description of the violation and whether it involved the abuse or illegal use of alcohol or drugs.
- Relevant dates (e.g., date of the alleged incident, date of investigation initiation, date of investigation conclusion, date of notice to the organization).
- University findings and any sanctions placed on the individuals and/or organizations.

Commonwealth of Massachusetts' Anti-Hazing Statute:

See G.L. c. 269, §§ 17-19.

§17. Hazing; organizing or participating; hazing defined.

Whoever is a principal organizer or participant in the crime of hazing, as defined herein, shall be punished by a fine of not more than three thousand dollars or by imprisonment in a house of correction for not more than one year, or both such fine and imprisonment.

The term "hazing" as used in this section and in sections eighteen and nineteen, shall mean any conduct or method of initiation into any student organization, whether on public or private property, which willfully or recklessly endangers the physical or mental health of any student or other person. Such conduct shall include whipping, beating, branding, forced calisthenics, exposure to the weather, forced consumption of any food, liquor, beverage, drug or other substance, or any other brutal treatment or forced physical activity which is likely to adversely affect the physical health or safety of any such student or other person, or which subjects such student or other person to extreme mental stress, including extended deprivation of sleep or rest or extended isolation.

Notwithstanding any other provisions of this section to the contrary, consent shall not be available as a defense to any prosecution under this action.

§18. Failure to report hazing.

Whoever knows that another person is the victim of hazing as defined in section seventeen and is at the scene of such crime shall, to the extent that such person can do so without danger or peril to himself or others, report such crime to an appropriate law enforcement official as soon as reasonably practicable. Whoever fails to report such crime shall be punished by a fine of not more than one thousand dollars.

§19. Issuance to students and student groups, teams, and organizations; report

Each institution of secondary education and each public and private institution of post-secondary education shall issue to every student group, student team or student organization which is part of such institution or is recognized by the institution or permitted by the institution to use its name or facilities or is known by the institution to exist as an unaffiliated student group, student team or student organization, a copy of this section and sections seventeen and eighteen; provided, however, that an institution's compliance with this section's requirements that an institution issue copies of this section and sections seventeen and eighteen to unaffiliated student groups, teams or organizations shall not constitute evidence of the institution's recognition or endorsement of said unaffiliated student groups, teams or organizations.

Each such group, team or organization shall distribute a copy of this section and sections seventeen and eighteen to each of its members, plebes, pledges, or applicants for membership. It shall be the duty of each such group, team or organization, acting through its designated officer, to deliver annually, to the institution an attested acknowledgement stating that such group, team or organization has received a copy of this section and said sections seventeen and eighteen, that each of its members, plebes, pledges, or applicants has received a copy of sections seventeen and eighteen, and that such group, team or organization understands and agrees to comply with the provisions of this section and sections seventeen and eighteen.

Each institution of secondary education and each public or private institution of post-secondary education shall, at least annually, before or at the start of enrollment, deliver to each person who enrolls as a full-time student in such institution a copy of this section and sections seventeen and eighteen.

Each institution of secondary education and each public or private institution of post-secondary education shall file, at least annually, a report with the board of higher education and in the case of secondary institutions, the board of education, certifying that such institution has complied with its responsibility to inform student groups, teams or organizations and to notify each full time student enrolled by it of the provisions of this section and sections seventeen and eighteen and also certifying that said institution has adopted a disciplinary policy with regard to the organizers and participants of hazing, and that such policy has been set forth with appropriate emphasis in the student handbook or similar means of communicating the institution's policies to its students. The board of higher education and, in the case of secondary institutions, the board of education shall promulgate regulations governing the content and frequency of such reports and shall forthwith report to the attorney general any such institution which fails to make such report.

EDUCATION, PREVENTION AND TRAINING PROGRAMS

Suffolk University engages in comprehensive, intentional, and integrated programming, initiatives, strategies, and campaigns intended to end domestic violence, dating violence, sexual assault, or stalking that:

- Are culturally relevant, inclusive of diverse communities, and identities, sustainable, responsive to community needs, and informed by research, or assessed for value, effectiveness, or outcome; and

- Consider environmental risk and protective factors as they occur on the individual, relationship, institutional, community, and societal levels.

Suffolk University educational programming consists of primary prevention and awareness programs for all incoming students and new employees, and ongoing awareness and prevention campaigns for students and employees that:

- Identifies domestic violence, dating violence, sexual assault or stalking as prohibited conduct;
- Defines what behavior constitutes domestic violence, dating violence, sexual assault, or stalking under Massachusetts law;
- Defines consent with regard to sexual activity under Massachusetts law and as defined in Suffolk University policies;
- Describes safe and positive options that a bystander can take when he or she witnesses potential domestic violence, dating violence, sexual assault, or stalking;
- Provides information on risk reduction to recognize warning signs of abusive behavior and how to avoid potential attacks.
- Provides an overview of information contained in the Annual Security Report in compliance with the Clery Act.

Bystander Intervention

At Suffolk University, the health, safety, and welfare of our students, employees, and other members of our community are of paramount concern. As such, Suffolk University students and employees are encouraged to seek to intervene in or interrupt, if it is safe to do so, any discriminatory behavior that they witness, including sexual misconduct.

Training in effective bystander intervention techniques is offered by various offices on campus. For more information, contact the Dean of Students Office (CAS and SBS) at 617.573.8239 or studentaffairs@suffolk.edu; the Dean of Students Office (Law) at 617.573.8157 or the Human Resources Department at 617.573.8415.

How to be an Active Bystander

Bystanders play a critical role in the prevention of sexual and relationship violence. They are individuals who observe violence or witness the conditions that perpetuate violence. They are not directly involved but have the choice to intervene, speak up, or do something about it.[3] We want to promote a culture of community accountability where bystanders are actively engaged in the prevention of violence without causing further harm. We may not always know what to do even if we want to help. Below is a list of some ways to be an active bystander.[4] If you or someone else is in immediate danger, dial 911. This could be when a person is yelling at or being physically abusive towards another and it is not safe for you to interrupt.

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[3] *Burn, S.M. (2009). A situational model of sexual assault prevention through bystander intervention. Sex Roles, 60, 779-792.*

[4] *Bystander intervention strategies adapted from Stanford University's Office of Sexual Assault & Relationship Abuse.*

Bystander intervention strategies adapted from Stanford University's Office of Sexual Assault & Relationship Abuse:

1. Watch out for your friends and fellow students/employees. If you see someone who looks like they could be in trouble or need help, ask if they are ok.
2. Confront people who seclude, hit on, try to make out with, or have sex with people who are incapacitated.
3. Speak up when someone discusses plans to take sexual advantage of another person.
4. Believe someone who discloses sexual assault, abusive behavior, or experience with stalking.
5. Refer people to on or off campus resources listed in this document for support in health, counseling, or with legal assistance.

Suffolk University's Education Programs

Several University offices and student organizations offer workshops and training opportunities for students, faculty, and staff to foster and promote individual and collective action to reduce sexual misconduct and interpersonal violence. Programs include bystander intervention, education about the role of alcohol, and drugs in consent and sexual assault, workshops for incoming students and their parents, education for employees and the dissemination of written materials. Contact the following offices for more information about specific programs:

Counseling, Health and Wellness Center
Tremont Street, 5th Floor
Counseling: 617.573.8226
Health and Wellness: 617.573.8260

Student Affairs/Dean of Students (CAS and SBS Students)
73 Tremont Street, 7th Floor
617.573.8239

Dean of Students Office (Law Students)
120 Tremont Street, 4th Floor
617.573.8157

Residence Life and Housing
73 Tremont Street, 7th Floor
617.305.2500

Human Resources
73 Tremont Street, 11th Floor
617.573.8415

Office of Title IX
73 Tremont Street, 13th Floor
617.573.8027

Suffolk University Police Department
148 Cambridge Street, 4th Floor
Non-emergency lines: 617.573.8113 or 617.573.8333

Peer Education

Student peer educators, the SUPERS (Suffolk University Peer-health Educators Resource), offer numerous informational workshops, panel discussions, info sessions and tables which present information on the relationship of alcohol and drugs to sexual misconduct, safer sex, relationship violence, and sexually transmitted infections.

Self-Defense Program

Suffolk University's Self Defense program provides realistic self-defense tactics and techniques for students and employees. It is a comprehensive course that begins with awareness, prevention, risk reduction, and risk avoidance, then progresses to the basics of hands-on self-defense training. It is not a martial arts program.

For further information, contact the Suffolk University Police Department at 617-573-8333.

Training Programs

Training is held annually for hearing officers on sexual misconduct incident investigation, impact of sexual misconduct on survivors, dynamics of sexual and relationship violence, interviewing techniques, and decision-making.

Training is held for a variety of campus groups, including students, student employees/resident assistants, student leaders, student athletes, faculty, and staff on sexual violence prevention, reporting expectations, and response protocols.

Training on sexual violence prevention, reporting expectations, and response protocols is conducted for all new students and employees through orientation programs. New students must complete the online educational tool, Haven Sexual Assault Prevention program, which uses a population-level approach to educate students on the issues associated with sexual assault. Haven provides students with specific definitions pertaining to sexual assault. The program addresses important distinctions between making decisions when consent is present and when consent is absent, or difficult to identify. The program relies on current statistics from the US Department of Justice to support the messages delivered in the course, helping raise awareness of the prevalence of this issue on college campuses. Haven addresses many of the assumptions and stereotypes associated with sexual assault, rape, stalking, and harassment and refutes these common misperceptions with facts and current statistics.

Risk Reduction

The following are some strategies to reduce one's risk of sexual assault or harassment (from *"Rape, Abuse & Incest National Network,"* www.rainn.org):

1. **Be aware of your surroundings.** Knowing where you are and who is around you may help you to find a way to get out of a bad situation.
2. **Try to avoid isolated areas.** It is more difficult to get help if no one is around.
3. **Walk with purpose.** Even if you don't know where you are going, act like you do.
4. **Trust your instincts.** If a situation or location feels unsafe or uncomfortable, it probably isn't the best place to be.
5. **Try not to load yourself down with packages or bags** as this can make you appear more vulnerable.
6. **Make sure your cell phone is with you** and charged and that you have taxi cab money or access to Uber or Lyft rideshares.
7. **Don't allow yourself to be isolated** with someone you don't trust or someone you don't e know.
8. **Avoid putting music headphones in both ears** so that you can be more aware of your surroundings, especially if you are walking alone.
9. **When you go to a social gathering, go with a group of friends.** Arrive together, check in with each other throughout the evening, and leave together. Knowing where you are and who is around you may help you to find a way out of a bad situation.
10. **Trust your instincts.** If you feel unsafe in any situation, go with your gut. If you see something suspicious, contact law enforcement immediately (local authorities can be reached by calling 911).
11. **Don't leave your drink unattended** while talking, dancing, using the restroom, or making a phone call. If you've left your drink alone, just get a new one.
12. **Don't accept drinks from people you don't know or trust.** If you choose to accept a drink, go with the person to the bar to order it, watch it being poured, and carry it yourself. At parties, don't drink from the punch bowls or other large, common open containers.
13. **Watch out for your friends, and vice versa.** If a friend seems out of it, is way too intoxicated for the amount of alcohol they've had, or is acting out of character, get him or her to a safe place immediately.
14. **If you suspect that you or a friend has been drugged, contact law enforcement immediately** (local authorities can be reached by calling 911). Be explicit with doctors so they can give you the correct tests (you will need a urine test and possibly other tests).
15. If you need to get out of an **uncomfortable or scary situation** here are some things that you can try:
    a. **Remember that being in this situation is not your fault.** You did not do anything wrong; it is the person who is making you uncomfortable that is to blame.
    b. **Be true to yourself.** Don't feel obligated to do anything you don't want to do. "I don't want to" is always a good enough reason. Do what feels right to you and what you are comfortable with.
    c. **Have a code word with your friends or family** so that if you don't feel comfortable you can call them and communicate your discomfort without the person you are with knowing. Your friends or family can then come to get you or make up an excuse for you to leave.

d. **Lie.** If you don't want to hurt the person's feelings it is better to lie and make up a reason to leave than to stay and be uncomfortable, scared, or worse. Some excuses you could use are needing to take care of a friend or family member, not feeling well, having somewhere else that you need to be, etc.

16. **Try to think of an escape route.** How would you try to get out of the room? Where are the doors? Windows? Are there people around who might be able to help you? Is there an emergency phone nearby?
17. **If you and/or the other person have been drinking**, you can say that you would rather wait until you both have your full judgment before doing anything you may regret later.

Policies

Policies are in place and are disseminated to students and employees to inform them of prohibited conduct, educational programs to promote the prevention of sexual misconduct, and reporting and support resources for survivors.

COMMUNITY STANDARDS AND THE STUDENT CONDUCT SYSTEM

There are extensive rules regarding the community standards and student conduct system at Suffolk University. View more about Suffolk's policies below.

Introduction

Suffolk University has established the Community Standards to promote and maintain an academic environment that is consistent with the mission of the University. The Student Conduct System addresses alleged violations of the community standards. Students are expected to carefully review the community standards outlined in this document and are required to comply with the Community Standards. Students will be held accountable for violations. Sanctions will range from a warning to removal from university housing to dismissal from the University to the withholding or the revocation of a degree. Minimum sanctions have been established for certain violations.

Guiding Principles of the Community Standards and the Student Conduct System

To enter Suffolk University is to accept an invitation to participate in a learning environment in which students are educated to become lifelong learners as well as professionals who lead and serve the communities in which they live and work. Choosing to become a member of this community requires members to respect and contribute to a genuine community of student, faculty, and staff learners who are mutually supportive and respectful. By voluntarily choosing to affiliate themselves with Suffolk University, students acknowledge, accept, and agree to comply with the responsibilities outlined in the Community Standards. The Suffolk University Community holds high expectations of how members live and interact with one another. Respect for oneself and respect for others lie at the heart of the Community Standards. Since its inception in 1906 as the Suffolk School of Law, the University has supported and encouraged diversity in a challenging, supportive environment for motivated and capable students from various backgrounds and cultures. As such, the Suffolk University Community Standards established for student members of the Suffolk Community are not always the same as those standards that apply to individuals within society at large. Students are accountable for their actions as a necessary part of community

life. The University's Community Standards go beyond what is simply required for public order.

Suffolk University has sought to educate students who—as leaders in law, business, and professional and civic life—will live by the highest intellectual and ethical standards. In search of this ideal, Suffolk strives to create an environment in which learning is a shared responsibility that is pursued in classrooms, studios, and laboratories; internships and study abroad programs; co-curricular and extracurricular activities; athletic fields; residence halls; and the city of Boston and beyond. The Suffolk University Community Standards and other policies are intended to contribute to the education and growth of student members of the campus community. The University will hold students accountable for their actions as a necessary part of community life.

Glossary of Terms

Administrative Hearing: A review of statements and/or information from a charged student, complainant, and/or witnesses with knowledge of an incident for the purpose of determining the charged student's responsibility for violating the Community Standards and to determine sanctions if the charged student is found responsible.

Advisor: Individual of the charged student's or complainant of sexual misconduct's choosing who may be present during any related meeting or administrative hearing. The advisor may not actively participate (speak) in any related meeting or administrative hearing. Rather, the advisor may serve as a support person for the charged student or complainant of sexual misconduct.

Complainant of Sexual Misconduct: Alleged victim/survivor of sexual misconduct.

Assistant Dean of Students, or Designee: The person responsible for the day-to-day management of the Community Standards and the Student Conduct System.

Business Days: Days that the University is open for business.

Charged Student: A student alleged to have violated the Community Standards who has been notified that he or she must attend an administrative hearing.

Community Standards: Behavioral expectations Suffolk University has established for its students.

Complaint: A written summary describing how a student is alleged to have violated the Community Standards.

Complainant: Any individual member of the Suffolk Community or the University itself that submits a written complaint that a student has violated the Community Standards.

Computing Facilities: Computers, laboratories or electronic equipment, including but not limited to printers, disc drives, flash drives, smartphones, tablets, screens, servers, software, computer labs, or networks.

Dean of Students, or Designee: The person responsible for the overall administration of the Community Standards and the Student Conduct System.

Disciplinary Hold: An administrative hold placed on a student's educational record when they do not respond to the request of a university official to attend a meeting or administrative hearing or has not completed a discipline sanction.

Determination Letter: A letter informing a charged student (and the complainant of sexual misconduct) of the outcome of an administrative hearing and any sanctions, if applicable.

Faculty Member: Any person authorized by the University to conduct classroom or teaching activities or who is otherwise considered by the University to be a member of its faculty.

Guest: An individual who is an associate of a student, staff or faculty member.

Hearing Officer: A University official authorized by the dean of students, or designee, to determine whether a student has violated the Community Standards and to impose a sanction when a violation of the Community Standards has been committed.

Interim Restrictions: Immediate sanctions taken against a student when the University believes that the student's continued presence on the campus endangers the physical safety or emotional state of the student or others, disrupts the educational process of the University or when the University determines that the interim restrictions are in the best interests of the University.

May: Used in the permissive sense.

Member of the University Community: Any person who is a student, faculty member, University representative, or any other person employed or engaged by the University. The assistant dean of students, or designee, will determine whether an individual is a member of the University community.

Notice to Appear: Written notice that a student is alleged to have violated the Community Standards and that the student must schedule an administrative hearing or attend an administrative hearing at a predetermined time.

Policy: Written rules or regulations of the University.

Residential Guest: Any individual who is visiting a residence hall on-campus who does not reside in that residence hall.

Sanction: A requirement a student must abide by or complete when found responsible for violating the Community Standards.

Student: Any person taking courses in the College of Arts & Sciences or the Sawyer Business School, either full-time or part-time, pursuing undergraduate, graduate, professional studies or a joint-degree program at the Law School, any person who withdraws from the University after allegedly violating the Community Standards; or any person who is not officially enrolled for a particular term but who has been admitted or has a continuing academic relationship with the University.

Student Conduct System: The process and procedures for addressing alleged violations of the Community Standards.

Suffolk University Community: A group sharing common characteristics or interests in the higher education of students at Suffolk University.

University: Suffolk University.

University Activities: Activities such as events, programs, and/or classes, whether on or off-campus offered under the auspices of Suffolk University or held in relation to or in collaboration with Suffolk University.

University Representative: Any person (including students) authorized by the University to perform assigned duties or act on behalf of the University in a recognized capacity.

University Premises: All land, buildings, facilities, and other property in the possession of or owned, rented, leased, used, or controlled by the University.

Visitor: Any non-Suffolk individual attending an event, program, etc.

Waiver of Responsibility: A form signed by a charged student in which they accept responsibility for violating the Community Standards and agrees to complete the sanction determined by the hearing officer.

Will: Used in the imperative sense.

Witness: Any person with information relevant to a student's alleged violation of the Community Standards.

Written Complaint: A written summary of an incident that is alleged to be a violation of the Community Standards.

Violation of Law and College Discipline

Student conduct may violate federal, state, or local law and/or the Suffolk University Community Standards. Violations may be addressed through the Student Conduct System, the civil or criminal court system, or both. When student conduct may have violated federal, state, or local law, Suffolk University may act against a student through the Student Conduct System prior to, simultaneously with, or following civil or criminal proceedings at the discretion of the assistant dean of students, or designee.

Determinations made or sanctions imposed under the Student Conduct System will not be subject to change when civil claims or criminal charges regarding the same incident are resolved in favor of the student defendant. However, the University reserves the right to impose additional sanctions if a student is found liable or guilty in a civil or criminal proceeding.

Students involved in civil and/or criminal proceedings related to student conduct that may violate the community standards are responsible for all costs associated with the civil or criminal proceeding.

The University cooperates with law enforcement and other agencies in the enforcement of civil or criminal law on campus and with any conditions that may be imposed by civil or criminal courts, including, but not limited to, those related to the rehabilitation of student violators, provided the conditions do not conflict with campus rules or sanctions.

Jurisdiction

The Suffolk University Community Standards and Student Conduct System apply to the conduct of any student or individual:

- Who is enrolled in or accepted for an academic course or program regardless of credits carried;
- Who withdraws from the University after allegedly violating the Community Standards; or
- Who is not officially enrolled for a particular term but who either was admitted to or who has a continuing academic relationship with the University.

The Suffolk University Community Standards and Student Conduct System also apply to any student group or organization.

The Community Standards and Student Conduct System apply to conduct that occurs on or off-campus including, but not limited to, conduct at university-sponsored activities, during all programs such as internships and study abroad, and to conduct that adversely affects the University community or the pursuit of its objectives, or calls into question the suitability of a student as a member of the Suffolk University community.

Each student is responsible for his/her conduct from the time of acceptance of admission through the actual awarding of a degree, even though the conduct may occur before classes begin or after classes end, as well as during the academic year or during periods between terms of actual enrollment, and even if the conduct is not discovered until after a degree is awarded.

The Community Standards and Student Conduct System apply to a student's conduct even if the student withdraws from the University while a complaint is being investigated or adjudicated.

The assistant dean of students, or designee, will decide, on a case-by-case basis, whether the Community Standards and Student Conduct System will be applied to conduct occurring off campus.

Students are responsible for the consequences of their actions even when the conduct may have been influenced by their physical or emotional state.
Students are responsible for the consequences of their actions even when the conduct may have been influenced by their use of alcohol or other drugs.

A disciplinary hold may be placed on a student's educational record when a student does not respond to the request of a university representative to attend a meeting or administrative hearing, or does not comply with a conduct sanction. Students with a disciplinary hold may not be permitted to register for courses, receive a diploma, add or drop courses, or participate in other University activities.

If a student fails to pay a conduct fine by the due date, the fine and any penalties may be added to the student's account. Policies for the payment of student accounts are managed by Student Accounts.

Conduct System

The dean of students is responsible for the overall administration of the Community Standards and Student Conduct System. The dean of students, or designee is authorized to delegate responsibilities to others and will appoint hearing officers to conduct administrative hearings. Under his/her direction, the assistant dean of students has been charged with the day-to-day responsibility for the administration of the Community Standards and Student Conduct System.

The assistant dean of students, or designee, will develop and maintain policies and procedural rules for the administration of the Student Conduct System consistent with the provisions of the Community Standards.

If a written complaint involves more than one charged student, the hearing officer, at his/her discretion, may determine whether an administrative hearing concerning each student will be conducted separately or jointly. Students are required to attend administrative hearings.

Administrative hearings are not open to the public. Therefore, members of the Suffolk University community who are not directly involved in the incident and friends, parents, partners, siblings, legal counsel, and others are not permitted in the room where the administrative hearing takes place, but may wait nearby for support purposes.

Students will be held accountable for violation such as the failure to obey a notice from a University representative to attend a meeting and/or appear for an administrative hearing; falsifying, distorting, or misrepresenting information at an administrative hearing; submitting or corroborating a false written complaint, or withholding information; attempting to discourage an individual's proper participation in or use of the Student Conduct System; attempting to influence the impartiality of the hearing officer; harassment or intimidation of a complainant, witness, or hearing officer in connection with an administrative hearing; failure to comply with a sanction imposed under the Student Conduct System; or influencing or attempting to influence another person to commit an abuse of the Student Conduct System.

Formal rules of process, procedure, or evidence such as those applied in civil or criminal courts are not used in the Student Conduct System.
Hearing officers will recuse themselves from a case, when appropriate.

Decisions resulting from an administrative hearing will be final, pending the appeal process.

Student conduct that warrants sanctions may result in forfeiture of all Suffolk scholarships, financial aid, or monies paid.

Initiation of Disciplinary Proceedings

Any individual member of the University community may submit a written complaint alleging a student violated the community standards. Complaints may also be submitted on behalf of the University.

The written complaint will be directed to the assistant dean of students, or designee. A written complaint must be submitted within 30 days of the incident that the University is open for business.

Upon receiving a written complaint, the assistant dean of students, or designee, may take one or more of the following steps:

- Offer a student the opportunity to accept responsibility for a violation of the Community Standards by signing a waiver and accepting sanctions;
- Conduct an investigative hearing, which includes notifying a student that he/she has been charged with a violation(s) of the Community Standards and must attend or schedule an administrative hearing;
- Dismiss the written complaint. Such disposition will be final and there will be no subsequent action; and/or
- Impose interim restrictions.

Waiver to Forgo an Administrative Hearing and Accept Responsibility for Violating the Community Standards and Accept Sanction(s)

A hearing officer may offer a student alleged to have violated the community standards a waiver to forgo an administrative hearing. By signing a waiver, the charged student accepts responsibility for violating the community standards and agrees to complete a sanction as determined by the hearing officer. The student waives his/her right to an administrative hearing and may not appeal the determination or sanctions.

Administrative Hearings

An administrative hearing will be conducted by a hearing officer appointed by the dean of students, or designee.

The purpose of an administrative hearing is to review information gathered from a charged student, complainant, and/or witnesses or others with information or knowledge of the incident so that the hearing officer can make a determination as to whether the charged student violated the community standards.
The charged student will be notified that a written complaint has been received and that he/she must schedule or appear at a predetermined time for an administrative hearing. Notification is

deemed to have occurred on the date on which the notice to appear is mailed, an e-mail is sent, a telephone conversation takes place, or a written message is delivered advising the student of this information.

Notice of the charges for an administrative hearing will be in writing and will include the date by which the student alleged to have violated the Community Standards must schedule the administrative hearing or will include the date, time, and location of the hearing the student is required to attend.

After being notified that he/she must schedule an administrative hearing, the charged student must do so within three (3) business days of such notification. The charged student is encouraged to schedule the administrative hearing as soon as possible.

After being notified that he/she must attend the administrative hearing at a predetermined time, the charged student must attend the administrative hearing.

Administrative hearings may be recessed at any time at the discretion of the hearing officer.

Absent compelling circumstances as determined by the hearing officer, if a charged student does not schedule an administrative hearing or appear at an administrative hearing scheduled for a predetermined time, the administrative hearing will be held in the student's absence. The hearing officer will issue a decision and sanctions will be imposed, if appropriate.

Generally, but not always, the order of an administrative hearing will proceed as follows:

- Introduction.
- Reading of the charges.
- Opening statement from the charged student.
- Questioning by the hearing officer.
- Closing statement from the charged student.

If the University is the complainant, an authorized representative of the University shall serve as the complainant.

The charged student may provide the names of up to four (4) witnesses with knowledge of the incident at least one (1) business day prior to the administrative hearing. Character witnesses are not permitted. The hearing officer will decide, in his/her sole discretion, whether to seek to obtain information from witnesses.

All procedural questions and decisions are subject to the final decision of the hearing officer.

Decisions of the hearing officer will be made based upon a determination of whether it is established, by a preponderance of the evidence, that the charged student violated the Community Standards.

After the administrative hearing concludes, the hearing officer will determine whether the charged student violated each section of the community standards that the student is alleged to have

violated.

The charged student will be notified in writing of the decision and sanction(s) imposed, if any. Notification is deemed to have occurred on the date on which a document is mailed, an e-mail is sent, or a written message is delivered.

A charged student will be entitled to:

- Receive written notice of charges;
- Receive a copy of the incident report within one (1) business day of the written request for a copy. Names of other individuals in the report will be removed consistent with applicable law;
- Be notified of the date, time, and place of the charged student's administrative hearing;
- Receive notice of the fact that the charged student's failure to schedule an administrative hearing by the due date or appear for an administrative hearing may result in the administrative hearing being conducted in the absence of the charged student;
- Provide the names of up to four (4) witnesses with knowledge of the incident at least one (1) business day prior to the administrative hearing. The hearing officer will decide, in his/her sole discretion, whether to seek to obtain information from witnesses;
- Decline to answer any questions or make any statements during an administrative hearing. The outcome of the administrative hearing will be based on the information or lack thereof presented at the administrative hearing and information gathered through an investigation (if applicable);
- Be informed in writing of the decision and sanction, if any; and
- Request in writing an appeal of the decision resulting from an administrative hearing no later than two (2) business days after the date of the determination letter.

The date of the request for the appeal is the date on which a document is mailed, an e-mail is sent, or a written message is delivered. A charged student is entitled to one appeal.

Sanctions

In determining a sanction, the hearing officer may consider all relevant information, including, but not limited to, the charged student's present demeanor; past disciplinary record; the nature of the misconduct, and the severity of any damage, injury, or harm resulting from the misconduct. Sanctions do not become effective until the appeals process is completed; however, any interim sanctions imposed remain in effect during the pendency of a hearing and/or an appeal. Some University policies specify sanctions for violations. See individual policies for required sanctions, if any.

The hearing officer may impose the following sanctions on any student found to have violated the Community Standards:

Warning: A notice, either verbal or written, that the student is violating or has violated University regulations, must cease the conduct immediately, and that continuation or repetition of wrongful conduct may be cause for more severe disciplinary action.

Parental Notification: The University may notify parents/guardians when students under the age of 21 have been found responsible for violating the University's alcohol or drug policies, or when there is a serious health or safety issue regarding a student.

Loss of Privileges: Denial of specified University and/or Residence Life & Housing or other privileges for a designated period of time, which may include, but is not limited to, denial of access to any campus facility, activity, event, class, or program. This includes, but is not limited to, orders prohibiting the student from having contact with a member of the Suffolk University community. This also includes, but is not limited to, loss of privileges in the residence halls, including, but not limited to, guest privileges, early arrival/late stay status, vacation period housing, or removal from a floor, room, or building. Should residence hall space not be immediately available, relocation may take place at an arranged time.

Confiscation of Property: Confiscation of items that the University determines are inappropriate for the University setting.

Fines: Financial sanction.

Restitution: Compensation for loss, damage, or injury. This may take the form of appropriate service or monetary, or material replacement.

Campus Service: Assignment of an appropriate service project that will benefit the University community, responsible student, or others.

Educational Program or Project: Required attendance at the student's expense at an educational workshop or completion of an educational project that will benefit the University community, responsible student, or others.

Referral: A student may be referred to Counseling, Health and Wellness, Student Affairs, Center for Learning & Academic Success, or another appropriate office or local agency for consultation, or assessment.

Unenrollment from a Course and/or Academic Program: A student may be unenrolled from a course and/or an academic program. In such cases, tuition and fees for the course will not be refunded to the student.

Order of No Contact: an order that restricts communication/contact between two or more parties.

Disciplinary Probation: A period of time during which a student's behavior is subject to examination.

Strict Disciplinary Probation: A period of time during which a student's behavior is subject to close examination. In addition, the student may be excluded from participation in some or all social and/or extracurricular activities, including, but not limited to, representing the University, participating in intercollegiate athletics, holding elected or appointed office in the Student Government Association or other student organization, or studying abroad.

Residence Relocation: Required reassignment to another residence area.

Deferred Loss of Housing: Warning that if the student is found responsible for violating the community standards during a specified period of time, the student may be immediately removed from the residence halls for a specific period of time, after which the student may reapply for housing.

Loss of Future Housing: The student is prohibited from participating in the returning student housing lottery or from participating in the returning student waitlist until the date specified or indefinitely if no date is specified.

Residence Hall Suspension: Separation of the student from the residence halls for a specific period of time, after which the student may reapply for housing. The student may not participate in the housing lottery for the following year or be on the housing waitlist while on Residence Hall suspension. Reapplication for housing does not guarantee the student will receive on-campus housing. Conditions for returning to the residence halls may be specified.

Residence Hall Dismissal: Permanent separation of the student from the residence halls.

Deferred University Suspension: A warning that if the student is found responsible for violating the community standards during a specific period of time, the student may be immediately suspended from the University for a specific period of time, after which the student may reapply. Conditions for return may be specified.

University Suspension: Suspension of the student from the University for a specific period of time, after which the student may apply to return. Conditions for return may be specified.

Deferred University Dismissal: Warning that if the student is found responsible for violating the community standards during a specific period of time, the student may be immediately dismissed from the University.

University Dismissal: Permanent separation of the student from the University. University dismissal will be noted in the student's transcript.

Revocation of Admission or Degree: Admission to the University or a degree awarded from the University may be revoked for fraud, misrepresentation, or other violation of the community standards in obtaining the degree or for other serious violations committed by a student prior to graduation.

Withholding Degree: The University may withhold awarding a degree otherwise earned until the completion of the disciplinary process, including any investigation, set forth in the Student Conduct System, including the completion of all sanctions imposed, if any.

Student Organization Recognition in Jeopardy: A warning that if the student organization is found responsible for violating the community standards during a specified period of time, the student organization's recognition may be revoked immediately.

Loss of Recognition: During a specific period of time, a recognized student organization may not associate itself with the University by using the University name, facilities, or other rights and privileges of recognized student organizations, after which the organization may reapply for recognition. There is no guarantee re-recognition will be granted. If re-recognition is granted, conditions for re-recognition may be specified.

More than one of the sanctions listed above may be imposed for any single violation. Other sanctions may be imposed instead of or in addition to those specified above. This list is provided by way of example only, and it is not intended to be exhaustive.

In addition to the above sanctions, students conduct that warrants action within the Student Conduct System may result in forfeiture of all Suffolk scholarships, financial aid, or monies paid.

Appeals of Decisions and Sanctions Resulting from Administrative Hearings

A charged student may submit one request for an appeal of the decision resulting from an administrative hearing no later than two (2) business days after notification. Notification is deemed to have occurred the date on which this document is mailed, an e-mail is sent, a telephone conversation takes place, or a written message is delivered advising the student of this information.

A request for an appeal is to be submitted in writing to the hearing officer who heard the case, who will then forward the appeal request to the assistant dean of students, or designee, for assignment to an impartial hearing officer for review. Appeals will be considered only for failure to follow the process or procedures outlined in the Student Conduct System, or if new information not available at the time of the hearing is now available. Students must include a statement of why the additional information should be considered and why it was not presented at the time of the original hearing.

An appeal is not a new hearing on the matter. Disagreement with the sanction is not grounds for an appeal.

The impartial hearing officer will:

- Determine whether the appeal request merits a formal appeal hearing and, if so, schedule an appeal hearing. An appeal is not a new hearing on the matter;
- Determine there are no grounds for the appeal, thus upholding the decision; or
- Refer the case to the hearing officer who originally heard the case for consideration of suggestions.

Appellate decisions are final.

Interim Restrictions

The assistant dean of students, or designee, may impose restriction(s) upon a student pending disciplinary proceedings. Interim restrictions become effective immediately without prior notice whenever the assistant dean of students, or designee, believes the student may pose a serious threat to others or property, cause serious disruption to the University community, or determines that interim restrictions are in the best interest of the University.

Interim restrictions may include suspension from the University or residence areas; relocation of residence; restriction to designated University residence areas or other campus facilities by time, or location; restriction of communication with named individuals or groups within the University community; or the requirement to obtain advance authorization to engage in a specified activity or any other restrictions the assistant dean of students, or designee, determines are appropriate under the circumstances. Interim restrictions will remain in effect during the pendency of an administrative hearing and/or appeal.

Discipline Records

Disciplinary records are educational records and are maintained in the Student Affairs and Residence Life & Housing offices. Disciplinary records are maintained by the Student Affairs and Residence Life & Housing offices for at least seven (7) years from the date of the incident. In situations involving both a charged student and a student who believes he/she was the victim of a student's misconduct, the records of the process and of the sanctions imposed, if any, will be considered to be the educational records of both the charged student and the alleged student victim because the educational career and chances of success in the academic community of each may be affected.

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

Interpretation and Revisions

Any question of interpretation or application of the Community Standards and Student Conduct System will be referred to the assistant dean of students, or designee, for final determination. The Community Standards and Student Conduct System will be reviewed at least every two (2) years under the direction of the assistant dean of students, or designee.

SEX OFFENDER REGISTRY INFORMATION

Any member of the Suffolk University community desiring information about registered sex offenders studying or working at Suffolk University must contact the Commonwealth of Massachusetts Sex Offender Registry Board.
Their contact information is as follows:

Hotline: 1-800-93MEGAN
Telephone: 978-740-6400
Address: PO Box 4547, Salem, MA 01970
SORB Website

In order to request sex offender registry information, you must fill out an appropriate request.

For further information, contact the legal department at the Sex Offender Registry Board at 978-740-6400.

This website will lead you to a national sex offender public website.* Dru Sjodin National Sex Offender Public Website

*Please note that Suffolk University neither creates nor maintains this database and cannot guarantee the accuracy or completeness of the information, which is the responsibility of various state and federal agencies. This disclosure is in compliance with 34 CFR Part 668.

CRIME PREVENTION PROGRAMS

The Suffolk University Police & Security Department employs a Captain and a Detective who are responsible for educating the community on security awareness and crime prevention. In addition to sending out periodic educational pamphlets, videos, articles, and advertisements in the University newsletter and student newspapers, and prominently posting crime prevention messages around campus, and on social media, this officer and the SUPD offer the following educational programs:

- Programs on transit safety, residence life safety, and safe city walks.
- Self Defense programs periodically throughout the academic year; usually three per semester, which focus on personal safety, awareness of surroundings, and personal physical defense.
- Programs for employee safety, self-defense, and use of self-defense sprays.
- Safety and crime prevention panels during Orientation for all incoming students.
- Participate in Alcohol Awareness safety in collaboration with Counseling, Health and Wellness and Title IX.
- Domestic Violence awareness and prevention tabling and documentary events.
- Every residential building has pamphlets on Sexual Assault, Domestic Violence, Stalking and Walking the City safely available for students.
- Educational posters regarding Alcohol awareness and Domestic Violence are located in all residential buildings.

FIRE SAFETY

Suffolk University has developed policies prohibiting activities and objects considered to be fire hazards or which pose a potential threat to the University community. University employees and resident students receive training related to the policies and are expected to understand and comply with them. Students in the residence halls may find additional policies and fire safety information in the Student Handbook at Residence Life – Fire Safety.

The Suffolk University Police and Security Department maintains a public fire log, which includes all reports of fires on the Boston campus.

For more detailed Fire Safety, Reporting, Response, and Evacuation information access the Suffolk University Emergency Plan.

Reporting Fires

Persons discovering a fire, smoky condition, or explosion should:

- Pull the nearest fire alarm pull station - this will notify the Boston Fire Department that there is a fire in the building.
- Fire alarm pull stations are located next to the interior stairwell doors.
- Walk to the nearest stairway or exit and leave the building.
- Do not use elevators during a fire.

Students living in the residence halls should also notify a member of the Residence Life and Housing staff of a fire, smoky condition, or explosion. Under federal law, Suffolk University is required to annually disclose statistical data on all fires that occur in on-campus student housing facilities. If you hear of or find evidence of a fire that has already been extinguished or of which you are unsure whether Suffolk University is already aware, please contact the SUPD at 617-573-8111.

Fire Safety Policies

The following activities, items, appliances, and decorations are prohibited at Suffolk University, including in the residence halls:

- Possession of items capable of producing an open flame (including all candles, incense, torches, Sterno, etc.).
- The use of items capable of producing an open flame (including all candles, incense, torches, Sterno, etc.) NOTE: The responsible use of matches and/or cigarette lighters is allowed only in designated smoking areas.
- The obstruction of any entrance, exit, corridor, or stairwell by placing furniture or other property in these areas.
- The storage and use of highly combustible items (including gasoline, charcoal lighter, propane gas, etc.).
- The hanging of tapestries or other large flammable items that cover ceilings, fire detectors, sprinklers, doors, or windows or are near other means of egress.
- The alteration of permanent lighting with, but not limited to, black lights, cloth, tapestries, and/or paper.
- The use or possession of unauthorized portable electrical appliances, including coffee pots/makers, electric heaters, and hot plates.
- The use or possession of heating elements or lighting elements, including sun lamps, halogen lamps (torchieres), and any items with open heating coils (i.e. grills, toasters[5], electric fry pans, waffle, panini, sandwich, or quesadilla makers, fryers, or auxiliary heaters).

[5] *Toasters are allowed in the apartments in the 10 West/Modern Theater apartments.*

Employees and students must use fire safety equipment properly, and the following conduct is prohibited at Suffolk University:

- The act of falsely pulling a fire alarm.
- Intentionally, recklessly, or negligently causing the sounding of a fire alarm without evidence of a fire.
- Failure to evacuate the building during a fire alarm.
- The act of causing the fire alarm to sound by intentionally or recklessly misusing or damaging other fire safety equipment.
- Tampering with any fire safety equipment, including, but not limited to, smoke detectors, fire extinguishers, fire safety signs or postings, telephone boxes, exit lights, emergency lighting, sprinklers, fire alarms, and fire doors.
- The act of discharging a fire extinguisher without evidence of fire.
- Tampering with electric circuit panels.
- The Office of Environmental Health and Safety (OEHS) may conduct fire safety inspections in the buildings on campus. Violations of this policy will be noted and items in violation of the policy may be confiscated. Requests to use or possess materials that are prohibited may be made on a case-by-case basis to OEHS.

Emergency Evacuation Procedures for Residence Halls

When the fire alarm is activated, a signal horn will sound. The following pre-recorded message will be heard over the intercom system:

"Attention please, the signal tone you have just heard indicates a report of an emergency in this building. If your floor evacuation signal sounds after this message, walk to the nearest exit stairway, and leave the floor. While this report is being verified, occupants on other floors should await further instruction."

After this message, an evacuation signal will sound on the affected floor, the floor above, and the floor below. Occupants of these three floors must exit the building by stairs.

Do not use the elevators to exit the building.

The stairwells are equipped with fire-rated doors. Individuals should stay to the right when exiting down a stairwell to allow passage by fire department personnel who may be using the stairwell to go to the fire area. If the stairwell contains fire or smoke, or is otherwise obstructed, select another appropriate escape route.

When an alarm sounds:

- Feel the door and the doorknob with the back of your hand. If they are hot, seek an alternate exit.
- Otherwise, when opening the door, brace yourself against it, and slowly open the door only a crack to check for smoke, heat, or flames. If there is too much smoke, heat, or flames, close the door and seek an alternate exit. If there is no alternate exit, proceed as follows:
    - Crawl or stay low to the floor where the air is cleaner and cooler. Avoid inhaling the

smoke, if you can.
  - Go back to your room and close the door.
  - Call the Boston Fire Department at 9-911.
  - Put wet towels or tape around the cracks in your door, vents, louvers, etc.
  - Breathe through a wet towel or handkerchief placed over the mouth and nose.
  - If windows can be opened, open one window if and only if the fire is not below the window.
  - Make your presence known by periodically appearing at the window.
- If you have a bathtub or sink, fill it with water. Keep a pan or can next to the tub. Use the water and pail to fight the fire should it enter the room.
- Do not jump out of windows or climb on ledges. If you are on the ground or first floor, safe evacuation from a window may be possible. To avoid being cut, try opening windows first before breaking them.
- If your clothing catches on fire, do not run. Stop, drop, and roll and immediately cover your face with your hands. Try to keep fire away from your face and breathing passages.

Please note, safety is a top priority, and the following should only be done if safe to do so:

- Shut off electrical appliances.
- Leave your room light on.
- Close your doors and windows.
- If you lock your door, take your keys with you (do not stop for valuables).
- Alert others around you.
- Assist any special needs/disabled persons in evacuating.

Student Housing - Fire and Life Safety Systems

All student housing, academic, and administrative buildings contain the following smoke and fire detections systems, fire prevention equipment, and building fire suppression systems:

Smoke Detectors - Smoke detectors provide the initial warning signal of fire in the building. They are installed throughout the building. The activation of a smoke detector will initiate the alarm sequence and will alert the appropriate authorities.

Fire Alarm Pull Stations - Fire alarm pull stations are located near the stairwell doors on each floor, and the building's exits. Pull stations, when activated, will activate the building's fire alarm system and automatically alert the Boston Fire Department. All building occupants should familiarize themselves with the location of the pull stations in their areas that are designated as exits.

Combination Audiovisual Devices - The audiovisual fire alarm signals for the building are horns and Americans with Disabilities Act (ADA) approved strobe lights. These devices are located throughout each floor in the building to provide complete communication during an emergency situation.

Fire Extinguishers - Fire extinguishers are installed on every floor. The extinguishers are a dry chemical type that is effective on Class A, B, and C fires. There may be several fire extinguisher locations, strategically placed, depending upon the size and design of the floor. Fire extinguishers

should be used by trained personnel only. The safe evacuation of the building is the number one priority.

Elevators - Elevators are not to be used during a fire or an emergency situation. The Boston Fire Department must be able to access the elevators in order to transport their personnel to various floors and to evacuate individuals needing physical assistance.

Stairwell Doors - Each building's stairwell doors are self-closing fire-rated doors, and are designed to prevent fire and smoke from spreading from floor to floor. Do not block or hold these doors open as this will allow smoke to enter stairwells during a fire.

Emergency Lighting - Emergency lighting is installed in building stairwells, corridors, and common areas to provide assistance for egress of individuals during an emergency situation.

Fire Protection Equipment and Systems - All campus buildings are equipped with automatic fire detection and alarm systems. The following are fire detection, notification, and suppression systems that can control a fire in campus facilities (please see the Academic and Residence Hall Building sections for building-specific information).

Building Fire Suppression Systems

Sprinkler systems

- Water
- Oxygen displacement system
- Commercial kitchen hood exhaust/suppression systems (ANSUL system) Standpipe systems
- Wet
- Dry

Fire extinguishers

- Multi-purpose dry chemical (Class A, B, and C fires)
- Water (Class A fires)
- Carbon dioxide (Class B and C fires)
- Class D extinguishers
- Class K Guard extinguishers (grease fires)

In addition to the systems just described, the following systems and procedures are specific to each of the residence halls:

The Nathan R. Miller Residence Hall at 10 Somerset Street

Miller Hall is a high-rise residence hall owned and operated by Suffolk University. The building is 20 stories in height and includes a penthouse and a basement. In addition, a glass-enclosed atrium with a skylight extends through the center of the building. The building has housing for approximately 345 students.

Evacuation Procedures and Routes - There are two staircases that can be used to exit the building at the 1st floor level. Stair 1 is located on the north side of the building and occupants exit the stairs on the first floor into the lobby and out the main entrance. Stair 2 is located on the south side of the building and occupants exit the stairs on the first floor into the lobby and out the main entrance.

If occupants are unable to evacuate through the lobby, there are two alternate exits available. One alternate exit is on the north side of the building and is accessible on the first floor by a door to the right of the elevators. This is a delayed egress door that opens after pushing on the crash bar for 15 seconds and opens into an outside space that will require a security gate to be unlocked to allow occupants to move away from the building. The other alternate exit is on the south side of the building and is accessible on the first floor by a door off of Stair 2. This is a delayed egress door that opens after pushing on the crash bar for 15 seconds and opens into an outside space that will require a security gate to be unlocked to allow occupants to move away from the building.

The primary assembly area for 10 Somerset Street is the open space outside One Beacon Street, across from 10 Somerset Street.

If there is a need to assemble further away from the building, the secondary assembly area is Roemer Plaza, which is located on the south side of 20 Somerset Street, outside the main entrance.

The designated areas of refuge for 10 Somerset Street are the landings in the stairwells on each floor. These areas are sometimes known as "emergency waiting areas" or "locations for rescue assistance." The enclosed stairwells are constructed of fire resistive materials that protect individuals from the effects of a fire during evacuation.

Reporting a Fire or Emergency - Persons discovering a fire, smoky condition, or explosion should pull the nearest fire alarm pull station which will notify the Boston Fire Department that there is an alarm in the building. Fire alarm pull stations are located on each floor. The horn/strobe alarms alert building occupants of the need for evacuation.

To report any emergency on campus, notify Suffolk University Police at extension 8111, or 617-573-8111.

When the Fire Alarm Sounds:

1. In the event of a fire alarm activation, a signal will sound, followed by a pre-recorded message. Listen to the pre-recorded message and follow the instructions. In most situations only certain floors will be required to evacuate.
2. Occupants should ensure that others nearby are aware of the emergency, and when directed to do so, exit the building by the established evacuation routes.
3. Occupants should assist visitors, students, and others who are not familiar with the building to safely evacuate.
4. All occupants should go to the assembly area and await further instructions from the Suffolk University Police Department or other emergency services personnel.
5. All occupants should know where their primary and alternate exits are located and be familiar with the various evacuation routes available. Floor plans with escape routes are

posted throughout the building.

6. Occupants must not use elevators as an escape route in the event of a fire or emergency evacuation.
7. No individual is permitted to re-enter the building until advised it is safe to do so by the Suffolk University Police Department or the Boston Fire Department.

***Individuals Needing Assistance* -** Some building occupants require assistance during building evacuation. Students who need assistance can voluntarily register with the Office of Disability Services located on the 7th floor of 73 Tremont Street. Their phone number is 617-994-6820.

Residence Assistants can help individuals needing assistance by directing them to areas of refuge (i.e. protected stairwells), and notifying emergency response personnel of their location. Transporting individuals with disabilities up and down stairs should be avoided except by trained emergency personnel. All individuals, regardless of their circumstances, need to take responsibility for their safety in an emergency, which means being able to move away from any and all hazards.

***Sprinkler System* -** High temperatures will activate the sprinkler system in the building by causing the sprinkler head to open and discharge water to a limited area. Additional sprinklers will activate if the fire is not contained. A fire pump automatically starts when the sprinkler system is activated and maintains water pressure within the system. Any flow of water from a sprinkler head will activate the fire alarm and will alert the Boston Fire Department, and Suffolk University Police Department.

***Standpipes* -** Standpipes – water pipes used specifically for fighting fires – provide water for the sprinkler system, and provide a connection for fire fighters to attach their hoses in both of the exit stairways, the north and south stairs. There are connections located in the stairwells on each floor.

Michael S. and Larry E. Smith Hall Residence Hall, 150 Tremont Street

150 Tremont Street is a 434-bed residence hall, owned and operated by Suffolk University. The building is 11 stories in height and contains a basement, and sub-basement. The building consists of 10 floors of living space in single, double, triple, or quad rooms.

***Evacuation Procedures and Routes* -** There are two staircases accessible from floors 2 – 11 that can be used to exit the building at the 1st floor level. Stair 1 is located on the Tremont Street side of the building and occupants exit the stairs on the first floor into the lobby and out the main entrance. Stair 2 is located on the back side of the building and occupants exit the stairs on the first floor onto Mason Street at the back side of the building. There are three staircases on floor 00 that can be used to access floor 0. Two of the stairs are located in the middle of the building, and one of the stairs is on the West Street/Tremont Street corner of the building. There are two staircases on floor 0 that can be used to access the 1st floor. One of the stairs is located in the middle of the building, and the other stair, Stair 3, is on the West Street/Mason Street corner of the building.

There are also two exits on the West Street side of the building. One of them is accessible from the cafeteria seating area, and the other one is accessible from a hallway at the rear of the building, at the top of Stair 3.

The primary assembly area for 150 Tremont Street is in front of 151 Tremont Street.

If there is a need to assemble further away from the building, the secondary assembly area is Sargent Hall, 120 Tremont Street.

The designated areas of refuge for 150 Tremont Street are the landings in the stairwells in Stair 1 and Stair 2. These areas are sometimes known as "emergency waiting areas" or "locations for rescue assistance." The enclosed stairwells are constructed of fire resistive materials that protect individuals from the effects of a fire during evacuation.

Exiting the Building and Assembly Area - Move away from the building to avoid danger from falling debris and to allow room for firefighters and their equipment. Do not congregate in lobby areas or just outside the exit doors.

Individuals exiting from 150 Tremont Street lobby: turn left out of the building and proceed to the front of the Tremont on the Commons Apartment Complex at 151 Tremont Street or follow the specific instructions of the Boston Fire Department or other emergency personnel.

Individuals exiting from the West Street exit: turn left and proceed up West Street, turn left on Tremont, and proceed to the front of the Tremont on the Commons Apartment Complex at 151 Tremont Street, or follow the specific instructions of the Boston Fire Department or other emergency personnel.

Individuals exiting from the Mason Street exit: turn left and proceed up Mason Street, turn left on West Street, turn left on Tremont, and proceed to the front of the Tremont on the Commons Apartment Complex at 151 Tremont Street, or follow the specific instructions of the Boston Fire Department or other emergency personnel.

Reporting a Fire or Emergency - Persons discovering a fire, smoky condition, or explosion should pull the nearest fire alarm pull station which will notify the Boston Fire Department that there is an alarm in the building. Fire alarm pull stations are located on each floor. The horn/strobe alarms alert building occupants of the need for evacuation.

To report any emergency on campus, notify Suffolk University Police at extension 8111, or 617-573-8111.

When the Fire Alarm Sounds:

1. In the event of a fire alarm activation, a signal will sound, followed by a pre-recorded message. Listen to the pre-recorded message and follow the instructions. In most situations only certain floors will be required to evacuate.
2. Occupants should ensure that others nearby are aware of the emergency, and when directed to do so, exit the building by the established evacuation routes.
3. Occupants should assist visitors, students, and others who are not familiar with the building to safely evacuate.
4. All occupants should go to the assembly area and await further instructions from the Suffolk University Police Department or other emergency services personnel.

5. All occupants should know where their primary and alternate exits are located and be familiar with the various evacuation routes available. Floor plans with escape routes are posted throughout the building.
6. Occupants must not use elevators as an escape route in the event of a fire or emergency evacuation.
7. No individual is permitted to re-enter the building until advised it is safe to do so by the Suffolk University Police Department or the Boston Fire Department.

Individuals Needing Assistance - Some building occupants require assistance during building evacuation. Students who need assistance can voluntarily register with the Office of Disability Services located on the 7th floor of 73 Tremont Street. Their phone number is 617-994-6820. Residence Assistants can help individuals needing assistance by directing them to areas of refuge (i.e. protected stairwells) and notifying emergency response personnel of their location. Transporting individuals with disabilities up and down stairs should be avoided except by trained emergency personnel. All individuals, regardless of their circumstances, need to take responsibility for their safety in an emergency, which means being able to move away from any and all hazards.

Sprinkler System - High temperatures will activate the sprinkler system in the building by causing the sprinkler head to open and discharge water to a limited area. Additional sprinklers will activate if the fire is not contained. A fire pump automatically starts when the sprinkler system is activated and maintains water pressure within the system. Any flow of water from a sprinkler head will activate the fire alarm and will alert the Boston Fire Department and Suffolk University Police Department.

Standpipes - Standpipes – water pipes used specifically for fighting fires – provide water for the sprinkler system and provide a connection for firefighters to attach their hoses in Stair 1, located on the west side of the building.

10 West Street/Modern Theater Residence Halls

10 West Street is a 466-bed residence hall, owned and operated by Suffolk University. The building consists of 11 floors of living space in single, double, triple, or quad rooms with options for suite and apartment living.

Evacuation Procedures and Routes - There are three staircases in the 10 West Street residence hall that can be used to exit the building at the 1st floor level. Stair 1 is located by the main elevators and occupants exit the stairs on the first floor and into the lobby and out the main entrance. Stair 2 is located on the Washington Street side of the building and occupants exit the stairs on the first floor and into an exit passage that opens onto Washington Street. Stair 5, accessible only up to the 2nd floor, is located in the middle of the building and occupants exit the stairs on the first floor and into an exit passage that opens onto Washington Street. There is also a fire escape that serves the 10 West Street residence hall. It is accessible from the 7th and 8th floors. The fire escape terminates on the intermediate roof on the 7th floor level. From there occupants walk across the walkway on the roof and into the Modern Theatre residence hall at Stairway 2. There are multiple staircases on floor 00 that can be used to access floor 0, and on floor 0 that can be used to access the 1st floor. Occupants are advised to look for the Exit signs on these levels for the closest as well as alternate

stairwells. There is also an exit on the 1st floor of the 10 West Street side of the building that opens onto Washington Street.

There are two staircases in the Modern Theatre residence hall that can be used to exit the building at the 1st floor level. Stair 2 is located on the Washington Street side of the building and occupants exit the stairs on the first floor and into an exit passage that opens onto Washington Street. Stair 3 is located on the elevator side of the building and occupants exit the stairs on the first floor and into the lobby and out the main entrance, or behind the Modern Theatre stage and out exit doors that open into an alley next to the building.

The primary assembly area for 10 West Street/Modern Theatre is in front of 150 Tremont Street.

If there is a need to assemble further away from the building, the secondary assembly area is Sargent Hall, 120 Tremont Street.

The designated areas of refuge for 10 West Street/Modern Theatre are the landings in stairwells 1, 2, & 5. These areas are sometimes known as "emergency waiting areas" or "locations for rescue assistance." The enclosed stairwells are constructed of fire resistive materials that protect individuals from the effects of a fire during evacuation.

Evacuation Routes - Two stairwells are located on the West Street side and the Washington Street side of the building. There is also a fire escape that runs down from the upper roof (above the 8th floor) to the lower roof (6th floor). There are entries to this fire escape from floors seven and eight. Once on the lower roof, people should walk across the roof and into the building and exit through Stairway Two. Residents, visitors, and employees should familiarize themselves with these fire exit stairwells.

Exiting the Building and Assembly Area - Move away from the building to avoid danger from falling debris and to allow room for firefighters, and their equipment. Do not congregate in lobby areas or just outside the exit doors.

Individuals exiting from the 10 West lobby: turn left out of the building and onto West Street, proceed down West Street to Tremont Street to the entrance to the residence hall at 150 Tremont Street, or follow the specific instructions of the Boston Fire Department or other emergency personnel.

Individuals exiting from Washington Street exit: turn left and proceed up West Street to Tremont Street to the entrance to the residence hall at 150 Tremont Street or follow the specific instructions of the Boston Fire Department or other law enforcement personnel.

Reporting a Fire or Emergency - Persons discovering a fire, smoky condition, or explosion should pull the nearest fire alarm pull station which will notify the Boston Fire Department that there is an alarm in the building. Fire alarm pull stations are located on each floor. The horn/strobe alarms alert building occupants of the need for evacuation.

To report any emergency on campus, notify Suffolk University Police at extension 8111, or 617-573-8111.

When the Fire Alarm Sounds:

1. In the event of a fire alarm activation, a signal will sound, followed by a pre-recorded message. Listen to the pre-recorded message and follow the instructions. In most situations only certain floors will be required to evacuate.
2. Occupants should ensure that others nearby are aware of the emergency, and when directed to do so, exit the building by the established evacuation routes.
3. Occupants should assist visitors, students, and others who are not familiar with the building to safely evacuate.
4. All occupants should go to the assembly area and await further instructions from the Suffolk University Police Department or other emergency services personnel.
5. All occupants should know where their primary and alternate exits are located and be familiar with the various evacuation routes available. Floor plans with escape routes are posted throughout the building.
6. Occupants must not use elevators as an escape route in the event of a fire or emergency evacuation.
7. No individual is permitted to re-enter the building until advised it is safe to do so by the Suffolk University Police Department or the Boston Fire Department.

Individuals Needing Assistance - Some building occupants require assistance during building evacuation. Students who need assistance can voluntarily register with the Office of Disability Services located on the 7th floor of 73 Tremont Street. Their phone number is 617-994-6820.

Residence Assistants can help individuals needing assistance by directing them to areas of refuge (i.e. protected stairwells), and notifying emergency response personnel of their location. Transporting individuals with disabilities up and down stairs should be avoided except by trained emergency personnel. All individuals, regardless of their circumstances, need to take responsibility for their safety in an emergency, which means being able to move away from any and all hazards.

Sprinkler System - High temperatures will activate the sprinkler system in the building by causing the sprinkler head to open and discharge water to a limited area. Additional sprinklers will activate if the fire is not contained. A fire pump automatically starts when the sprinkler system is activated and maintains water pressure within the system. Any flow of water from a sprinkler head will activate the fire alarm and will alert the Boston Fire Department and Suffolk University Police Department.

Standpipes - Standpipes – water pipes used specifically for fighting fires – water for the sprinkler system and provide a connection for firefighters to attach their hoses in stair 1 and stair 3, located on the west side of the building.

One Court Street

One Court is a residence hall, owned and operated by Suffolk University. The building consists of fourteen (14) floors of living space in single, double, triple, or quad rooms. Additionally mechanical spaces are provided for two (2) additional floors above and one (1) basement level. The building also consists of:

- Café
- Kitchen
- Office
- Social and lounge spaces
- Conference and small meeting spaces
- Laundry facilities

Evacuation Routes

Two stairwells, Stair 1 and Stair 2, are provided which serve all floors of the building. In addition to the main stairwells, there is a stair which connects the basement kitchen area to the First Floor Café.

Exiting the Building

Move away from the building to avoid danger from falling debris and allow room for firefighters and their equipment. Do not congregate in lobby areas or just outside the exit doors.

- Individuals exiting from Stair 1, Stair 2, or the Lobby – Turn left out of the building and onto Court Street. Proceed down Court Street until reaching a safe distance from the building.
- Individuals exiting from the Cafe – Turn right out of the building and continue down the courtyard to Court Street. Proceed down Court Street until reaching a safe distance from the building.

Assembly

Individuals exiting One Court Street should gather at the intersection of Congress Street and State Street, at Washington Mall Plaza in front of 28 State Street, and wait for instructions.

Life Safety Systems

Sprinkler System

High temperatures will activate the sprinkler system in the building by causing the sprinkler head to open and discharge water to a limited area in the immediate vicinity of the fire. Additional sprinklers will activate if the fire is not contained by the original activating sprinkler. A fire pump rated for 750 gallons per minute automatically starts when the sprinkler system is activated and maintains water pressure within the system. Any flow of water from a sprinkler head will activate the fire alarm and will alert the Boston Fire Department and Suffolk University Police Department.

Sprinkler Zone Valves

FLOOR	SPRINKLER VALVE LOCATION
Basement	Stair 1 and Stair 2
1	Stair 1 and Stair 2
2	Stair 1 and Stair 2
3	Stair 1 and Stair 2
4	Stair 1 and Stair 2
5	Stair 1 and Stair 2
6	Stair 1 and Stair 2
7	Stair 1 and Stair 2
8	Stair 1 and Stair 2
9	Stair 1 and Stair 2
10	Stair 1 and Stair 2
11	Stair 1 and Stair 2
12	Stair 1 and Stair 2
14	Stair 1 and Stair 2
15	Stair 1 and Stair 2
16 (Roof)	Stair 1 and Stair 2
17 (Roof)	Stair 1

Standpipes

Standpipes, water pipes used specifically for fighting fires, provide water for the sprinkler system, and provide a connection for fire fighters to attach their hoses in Stair 1 and Stair 2.

Fire Pump

Location: Basement (B-004), accessed from Stair 1 via Lobby from Court Street, labeled "Fire Pump Room".

Fire Alarm System

Activation of the buildings fire alarm system can occur by either an automatic means (smoke detector, heat detector, or sprinkler waterflow) or manual means (manual pull station). The fire alarm system is provided with emergency voice/alarm capabilities which provides verbal cues related to the evacuation of the building and allows the Boston Fire Department to broadcast messages to all floors of the building. Any activation of the fire alarm system will alert the Boston Fire Department and Suffolk University Police Department.

Fire Alarm System Evacuation Procedure

In the event of the fire alarm system activation, an evacuation tone and audible message will alert throughout the entirety of the building via the speaker/strobe devices found on all floors. Upon completion of the tone and message, the evacuation tone will sound on the floor of fire alarm activation, floor above, and floor below. The visual strobes on all floors will continue to flash.

Occupants of other floors are not intended to evacuate the building, unless their floor evacuation tone is sounding.

Elevator Recall

In the event of activation of the smoke detectors located in the front or rear elevator lobby (passenger or freight lobby), the buildings elevators will return to a designated floor (First floor) for use by the Boston Fire Department in an emergency situation.

Smoke Control System

Activation of the buildings sprinkler or fire alarm systems will also initiate the buildings smoke control systems. The buildings smoke control system is comprised of two (2) pressurized exit stairwells (Stair 1 and Stair 2), a ventilated vestibule (Stair 2), and one (1) pressurized elevator hoist way (two (2) passenger and one (1) freight elevator cab). The goal of the buildings smoke control system is to pressurize the stair and elevator shafts to prevent smoke migration from the floor of activation. Manual control of the buildings smoke control system is provided in the fire command center by a dedicated firefighter's smoke control panel. Each system component is served by a fan which is located at the roof level. Upon activation of the smoke control systems, increase airflow will be noticeable in the buildings stairs and elevators.

Emergency Evacuation Procedures for Academic and Administrative Buildings

A comprehensive plan for emergency evacuation procedures has been developed for academic and administrative buildings at Suffolk University. The purpose of this plan is to outline the emergency action plan in accordance with the Occupational Safety and Health Administration (OSHA) regulations [29 CFR 1910.38]. For more detailed information access the Suffolk University Emergency Plan.

Floor evacuation diagrams showing escape routes are posted in corridors on each floor and designate the nearest stairwell from that location. Individuals should follow the escape route to the nearest stairwell exit.

Leave the building, even if the alarm stops while you are on your way out.

No occupant, student, or staff member is permitted to re-enter the building until the Boston Fire Department or Suffolk University Police give the all-clear. Only individuals with emergency duties may enter the building prior to this all clear being given.

Fire Drills

The Suffolk University Police & Security Department, the Office of Emergency Management, Facilities Management, and Residence Life, conducted two (2) fire drills in each of the residence halls during calendar year 2025.

Future Improvements in Fire Safety

At the present time, no improvements in the fire safety program for Suffolk University's residence are deemed necessary.

APPENDIX 1 – Definitions of Reportable Crimes

Aggravated Assault: An unlawful attack by one person upon another for the purpose of inflicting severe or aggravated bodily injury. This type of assault is usually accompanied by the use of a weapon or by means likely to produce death or great bodily harm. It is not necessary that injury result from an aggravated assault when a gun, knife, or other weapon is used which could and probably would result in serious personal injury if the crime were successfully completed.

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

Burglary: The unlawful entry of a structure to commit a felony or a theft. For reporting purposes this definition includes: unlawful entry with intent to commit a larceny or felony, breaking and entering with intent to commit a larceny, housebreaking, safecracking, and all attempts to commit any of the aforementioned.

Criminal Homicide:

> ***Murder and non-negligent manslaughter***: The willful (non-negligent) killing of one human being by another.
> ***Negligent manslaughter***: The killing of another person through gross negligence.

Dating Violence: Dating violence means violence committed by a person who is or has been in a social relationship of a romantic or intimate nature with the victim and where the existence of such a relationship shall be determined based on a consideration of the following factors: the length of the relationship, the type of relationship; and the frequency of interaction between the persons involved in the relationship.

Domestic Violence: Domestic violence includes felony or misdemeanor crimes of violence committed by a current or former spouse or intimate partner of a 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 spouse or intimate partner, by a person similarly situated to a spouse of the victim under Massachusetts law, or by any other person against an adult or youth victim who is protected under the domestic or family violence laws of Massachusetts.

Destruction/Damage/Vandalism of Property (Except Arson): To willfully or maliciously destroy, damage, deface, or otherwise injure real or personal property without the consent of the owner or the person having custody or control of it.

Drug Law Violations: The violation of laws prohibiting the production, distribution, and/or use of certain controlled substances and the equipment or devices utilized in their preparation, and/or use. The unlawful cultivation, manufacture, distribution, sale, purchase, use, possession, transportation, or importation of any controlled drug or narcotic substance. Arrests for violations of state and local laws, specifically those relating to the unlawful possession, sale, use, growing, manufacturing, and making of narcotic drugs.

Hazing: Any conduct or method of initiation into any student organization, whether on public or private property, which willfully or recklessly endangers the physical or mental health of any student or other person. Such conduct shall include whipping, beating, branding, forced calisthenics, exposure to the weather, forced consumption of any food, liquor, beverage, drug or other substance, or any other brutal treatment or forced physical activity which is likely to adversely affect the physical health or safety of any such student or other person, or which subjects such student or other person to extreme mental stress, including extended deprivation of sleep or rest or extended isolation.

Illegal Weapons Possession: The violation of laws or ordinances prohibiting the manufacture, sale, purchase, transportation, possession, concealment, or use of firearms, cutting instruments, explosives, incendiary devices, or other deadly weapons.

Intimidation: To unlawfully place another person in reasonable fear of bodily harm through the use of threatening words and/or other conduct, but without displaying a weapon or subjecting the victim to actual physical attack.

Larceny/Theft (Except Motor Vehicle Theft): The unlawful taking, carrying, leading, or riding away of property from the possession or constructive possession of another. Attempted larcenies are included. Embezzlement, confidence games, forgery, worthless checks, etc. are excluded.

Liquor Law Violations: The violation of state or local laws, or ordinances prohibiting the manufacture, sale, purchase, transportation, possession, or use of alcoholic beverages, not including driving under the influence and drunkenness.

Motor vehicle theft: The theft or attempted theft of a motor vehicle. Classify as motor vehicle theft all cases in which automobiles are taken by persons not having access even though the vehicles are later abandoned—including joyriding.

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

Sexual Assault: "Sexual assault" means an offense that meets the definition of rape, fondling, incest or statutory rape as used in the FBI's Uniform Crime Reporting system. A sex offense is any sexual contact directed against another person, without consent of the victim, including instances where the victim is incapable of giving consent.

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

Statutory Rape: Statutory rape is defined as non-forcible sexual intercourse with a person who is under the statutory age of consent.

Simple Assault: An unlawful physical attack by one person upon another in which neither the offender displays a weapon, nor the victim suffers obvious severe or aggravated bodily injury involving apparent broken bones, loss of teeth, possible internal injury, severe laceration, or loss of consciousness.

Stalking: Stalking, which includes cyber stalking, means a course of conduct directed at a specific person that would cause a reasonable person to fear for her, his, or others' safety, or to suffer substantial emotional distress. For the purposes of this definition:

- ***"Course of conduct"*** means two or more acts, including, but not limited to, acts which the stalker directly, indirectly, or through third parties, by any action, method, devise or means follows, monitors, observes, surveils, threatens, or communicates to or about, a person, or interferes with the 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 persons"*** means a reasonable person under similar circumstances and with similar identities to the victim.

APPENDIX 2 – Fire Safety Definitions

Cause of Fire: The factor or factors that give rise to a fire. The causal factor may be, but is not limited to, the result of an intentional or unintentional action, mechanical failure, or act of nature.

Fire: Any instance of open flame or other burning in a place not intended to contain the burning or in an uncontrolled manner.

Fire Drill: A supervised practice of a mandatory evacuation of a building for a fire.

Fire Safety System: Any mechanism or system related to the detection of a fire, the warning resulting from a fire, or the control of a fire. This may include sprinkler systems or other fire extinguishing systems; fire detection devices; stand-alone smoke alarms; devices that alert one to the presence of a fire, such as horns, bells, or strobe lights; smoke-control and reduction mechanisms; and fire doors and walls that reduce the spread of a fire.

Fire-Related Death: Any instance in which a person:

- Is killed as a result of a fire, including death resulting from a natural or accidental cause while involved in fire control, attempting rescue, or escaping from the dangers of a fire; or
- Dies within one year of injuries sustained as a result of the fire.

Fire-Related Injury: Any instance in which a person is injured as a result of a fire, including an injury sustained from a natural or accidental cause while involved in fire control, attempting rescue, or escaping from the dangers of the fire. The term "person" may include students, employees, visitors, firefighters, or any other individuals.

Value of Property Damage: The estimated value of the loss of the structure and contents, in terms of the cost of replacement in like kind and quantity. This estimate should include contents damaged by fire, and related damage caused by smoke, water, and overhaul; however, it does not include indirect loss, such as business interruption.

SUFFOLK UNIVERSITY - CRIME STATISTICS 2023-2025

	2023						2024						2025					
	On Campus	Non Campus	Public	Res Halls *	Unfounded **	Total	On Campus	Non Campus	Public	Res Hall *	Unfounded **	Total	On Campus	Non Campus	Public	Res Halls *	Unfounded **	Total
Homicide																		
Murder and non-negligent manslaughter	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Negligent manslaughter	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Sexual Assault																		
Rape	1	0	0	1	0	1	1	0	0	1	0	1	2	0	0	2	0	2
Fondling	2	0	1	2	0	3	1	0	0	0	0	1	2	0	0	2	0	2
Incest	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Statutory Rape	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Domestic Violence	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Dating Violence	1	0	0	1	0	1	3	0	1	3	0	4	2	0	0	2	0	2
Stalking	3	0	0	1	0	3	1	0	0	1	0	1	2	1	0	1	0	2
Robbery	0	0	0	0	0	0	1	0	3	1	0	4	1	0	0	1	0	1
Aggravated Assault	0	0	2	0	0	2	0	0	5	0	0	5	0	0	0	0	0	0
Burglary	1	0	0	1	0	1	2	0	0	2	0	2	0	0	0	0	0	0
Motor vehicle theft	0	0	0	0	0	0	0	0	3	0	0	3	0	0	0	0	0	0
Arson	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
TOTAL	8	0	3	6	0	11	9	0	12	8	0	21	9	1	0	8	0	9
Number of Arrests																		
Illegal Weapons Possession	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Drug Law Violations	0	0	2	0	0	2	0	0	3	0	0	3	0	0	0	0	0	0
Liquor Law Violations	0	0	0	0	0	0	1	0	0	1	0	1	0	0	0	0	0	0
TOTAL	0	0	2	0	0	2	1	0	3	1	0	4	0	0	0	0	0	0
Number of Referrals																		
Illegal Weapons Possession	0	0	2	0	0	2	2	0	0	1	0	2	2	0	0	2	0	2
Drug Law Violations	8	0	0	8	0	8	5	0	0	5	0	5	7	0	0	7	0	7
Liquor Law Violations	114	0	0	114	0	114	110	0	0	110	0	110	115	0	0	115	0	115
TOTAL	122	0	2	122	0	124	127	0	0	116	0	117	124	0	0	124	0	124

* All crimes in the Residence Hall columns are also represented in the On Campus columns.

** Unfounded crimes. If a reported crime is investigated by law enforcement authorities and found false or baseless, the crime is "unfounded" and is not included in the university's statistics.

SUFFOLK UNIVERSITY - HATE CRIME STATISTICS 2023-2025

	2023						2024						2025					
Hate Crimes*	On Campus	Non Campus	Public	Res Halls **	Unfounded***	Total	On Campus	Non Campus	Public	Res Hall **	Unfounded***	Total	On Campus	Non Campus	Public	Res Halls **	Unfounded***	Total
Murder and non-negligent manslaughter:	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Sexual Assault	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Domestic Violence	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Dating Violence	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Stalking	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Robbery	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Aggravated Assault	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Burglary	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Motor vehicle theft	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Arson	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Larceny theft	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Simple Assault	0	0	1 D	0	0	1	1 SO	0	0	1 SO	0	1	0	0	0	0	0	0
Intimidation	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Destruction Damage/Violation of property	0	0	0	0	0	0	0	0	0	0	0	0	1 RE	0	0	0	0	1

***Crimes in which the victim intentionally selected because of the actors or perceived, race, ethnicity, national origin, religion, gender, gender identity, sexual orientation, or disability.**

****All crimes in the Residence Halls columns are also represented in the On Campus columns.**

*****Unfounded crimes if reported is investigated by law enforcement and found to be false or baseless, the crime is "unfounded" and is not included in the university's statistics.**

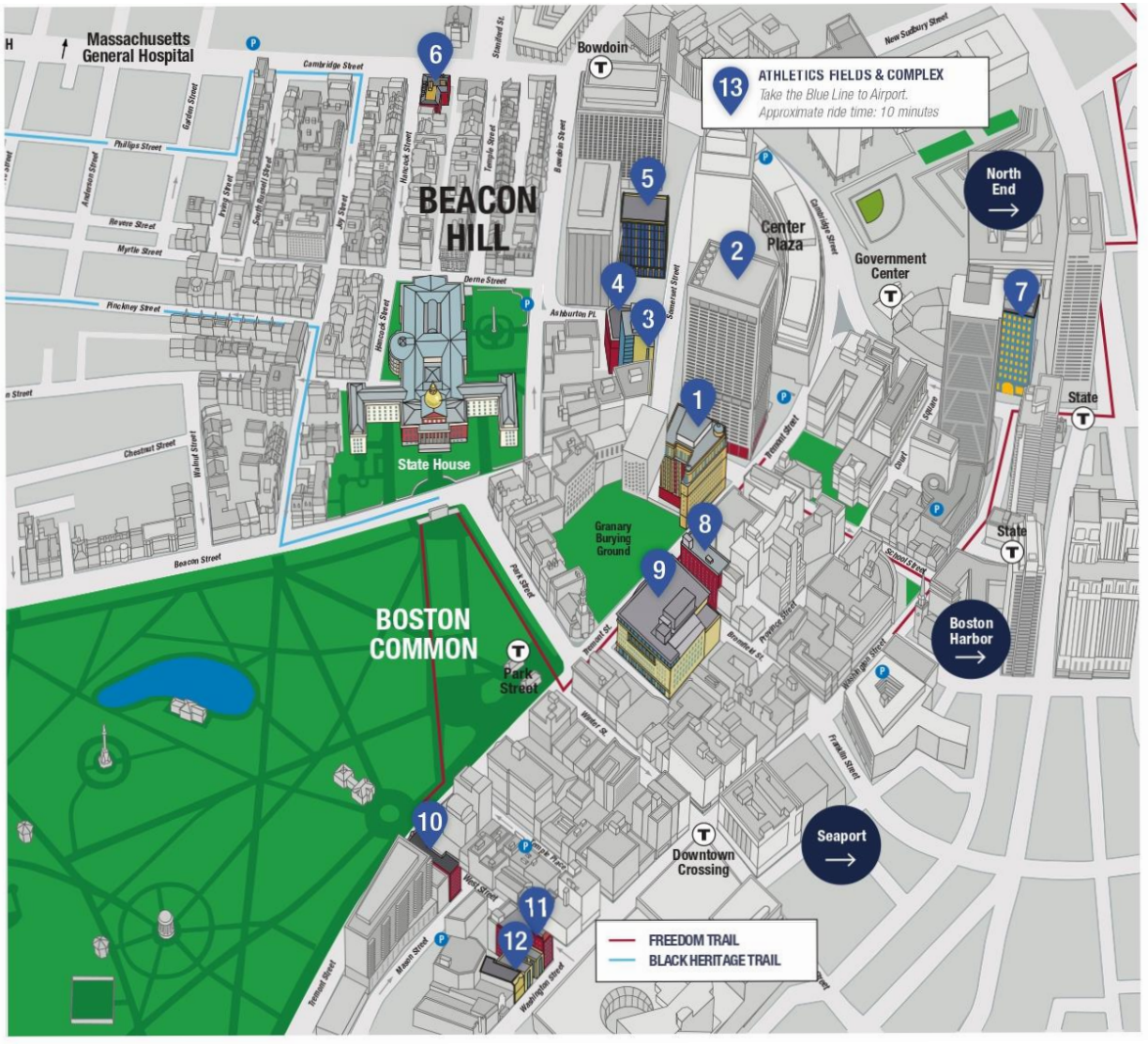
Bias Key: **R - Race** **RE - Religion** **SO - Sexual Orientation**
E - Ethnicity **G - Gender** **D- Disability**
NO - National Origin **GI - Gender Identity**

SUFFOLK UNIVERSITY - FIRE STATISTICS 2023-2025

Residential Facilities	Total Fires in each building	Fire Number	Cause of Fire	Number of Inquires that Required Treatment in a Medical Facility	Number of Deaths Related to a Fire	Value of Property Damage Caused by Fire.
2023						
Michael S. & Larry E. Smith Residence Hall, 150 Tremont Street	0	N/A	N/A	N/A	N/A	N/A
10 West Street Residence Hall	0	N/A	N/A	N/A	N/A	N/A
Nathan R. Miller Residence Hall	0	N/A	N/A	N/A	N/A	N/A
Modern Theater & Residence Hall	0	N/A	N/A	N/A	N/A	N/A
One Court Street Residence Hall	0	N/A	N/A	N/A	N/A	N/A
Wyndham Boston Beacon Hill Hotel, 5 Blossom Street	0	N/A	N/A	N/A	N/A	N/A
2024						
Michael S. & Larry E. Smith Residence Hall, 150 Tremont Street	0	N/A	N/A	N/A	N/A	N/A
10 West Street Residence Hall	0	N/A	N/A	N/A	N/A	N/A
Nathan R. Miller Residence Hall	0	N/A	N/A	N/A	N/A	N/A
Modern Theater & Residence Hall	0	N/A	N/A	N/A	N/A	N/A
One Court Street Residence Hall	0	N/A	N/A	N/A	N/A	N/A
Wyndham Boston Beacon Hill Hotel, 5 Blossom Street	0	N/A	N/A	N/A	N/A	N/A
2025						
Michael S. & Larry E. Smith Residence Hall, 150 Tremont Street	1	1	Food Preparation	N/A	N/A	N/A
10 West Street Residence Hall	0	N/A	N/A	N/A	N/A	N/A
Nathan R. Miller Residence Hall	0	N/A	N/A	N/A	N/A	N/A
Modern Theater & Residence Hall	0	N/A	N/A	N/A	N/A	N/A
One Court Street Residence Hall	0	N/A	N/A	N/A	N/A	N/A
Wyndham Boston Beacon Hill Hotel, 5 Blossom Street	0	N/A	N/A	N/A	N/A	N/A

SUFFOLK UNIVERSITY – CAMPUS MAP

CAMPUS MAP

1. **Rosalie K. Stahl Center**
   University Welcome Center
   73 Tremont Street
2. **One Beacon Street**
3. **Nathan R. Miller Residence Hall**
   10 Somerset Street
4. **Frank Sawyer Building**
   8 Ashburton Place
5. **Leonard J. Samia Academic Center**
   20 Somerset Street
6. **Ridgeway Building**
   148 Cambridge Street
7. **Residence Hall**
   One Court Street
8. **Residence Hall**
   101 Tremont Street
9. **David J. Sargent Hall**
   120 Tremont Street
10. **Michael S. & Larry E. Smith Residence Hall**
    150 Tremont Street
11. **Residence Hall**
    10 West Street
12. **Modern Theatre & Residence Hall**
    523–525 Washington Street
13. **Athletics Fields**
    150 Porter Street
    East Boston

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BOSTON