

DENISON



2023

Annual Security Report & Annual Fire Report

Policy Information for 2023 2024 Academic Year | Contains Crime Statistics for 2020 2022

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Annual Security Report

Policy on Reporting the Annual Disclosure of Crime Statistics

Denison University is committed to providing a safe living, learning and working environment for its students, faculty and staff. Each member of the campus community - students, faculty, and staff - should take an active role in preventing and reporting incidents that jeopardize safety on and around campus. This publication, *The Annual Security and Fire Safety Report* is to inform and disclose to current and prospective students, faculty and staff Denison University's campus security policies and campus crime statistics and may be used as a guide for safe practices on and off campus.

The Denison University Campus Safety Office, in compliance with the Jeanne Clery Disclosure of Campus Security Policy & Campus Crime Statistics Act and the Higher Education Opportunity Act, prepares and posts this publication on Denison's web site at www.denison.edu/forms/annual-campus-safety-and-fire-safety-report to provide its students and employees with an overview of the University's security and safety resources, policies, and procedures. The policies and procedures are subject to change at any time. Denison notifies all students, staff, and faculty of the publication via email and through the Denison Office of Campus Safety website. All current or prospective faculty, staff, and students can obtain a paper copy at the Office of Campus Safety (P1 level of the Parking Garage) or by calling (740) 587-6298, or by e-mailing campussafety@denison.edu. The University also provides the annual crime and fire statistics contained in this report to the U.S. Department of Education.

This document contains specific information on safety and security, crime prevention, coordination between law enforcement agencies, policies relating to reporting crime, campus disciplinary procedures, and crime statistics for the three previous calendar years. The statistics represent reported crimes that occurred on campus, in certain off-campus buildings or property owned or controlled by Denison University, and on public property that is immediately adjacent to and accessible from the campus. The report presents additional information about the campus, police and public safety resources, reporting and responding to fire and medical emergencies, fire prevention, fire statistics, victim support services, campus facilities, residence hall security, the University Policy on Sexual Harassment, and the Denison University Drug and Alcohol Policy. It also contains information about alcohol and other drug health risks, drug and alcohol laws and penalties, and campus alcohol and other drug education and counseling resources.

This report is compiled using information maintained by the Office of Campus Safety, information provided by other College offices such as the Office of Student Life, Office of Community Values & Student Conduct, Residential Communities and Housing, and other Campus Security Authorities, as well as information provided by local law enforcement agencies. Each of these offices provides updated policy information and/or crime data.

Crimes statistics are gathered from Campus Safety reports, the Office of Community Values, Residential Communities and Housing, and other Campus Security Authorities for Clery crime statistics that occurred on campus. Information is requested from local Law Enforcement such as Granville Police Department and the Columbus Police Department for statistics for the Denison Granville campus and Denison Edge property.

The Campus

Denison University is a leading national liberal arts college, offering 65 academic programs to 2,300 fully

residential students from 50 U.S. states and 79 countries. With its handcrafted education that develops core liberal arts skills while fostering awareness and competencies in civic leadership, Denison imparts the knowledge and experience that positions its graduates to address the critical global issues that will shape the next chapter of human history.

In 1916, the famed landscape architectural firm founded by Frederick Law Olmsted — designer of New York City's Central Park, many of America's historic national parks, and a number of distinguished college campuses — produced an innovative design for Denison, utilizing the campus's unique location atop a prominent ridge on the rolling landscape of Central Ohio's Welsh Hills. The Olmsted Plan has remained the touchstone for the continuing development of the Denison campus, with academic halls located on the center of more than 150-acres on College Hill, residential halls placed on the east and west ends of the ridge, and a careful groupings of buildings in striking and stately quadrangles.

Denison University's picturesque hilltop campus is exceptionally well-suited for its academic mission. It features a mixture of historic and contemporary buildings, and state-of-the-art facilities serve the sciences and arts, as well as athletics. The campus in its entirety spans 930 acres, including a 360-acre biological reserve and the historic Denison Golf Club. Students reside in 35 residential buildings that provide traditional single, double, and triple rooms off common corridors, as well as suites, and apartments. Students have access to gender-neutral lodging, or "open housing," after their first year at Denison. All buildings, academic, residential, and athletic, are within walking distance of one another, which helps build a strong sense of community.

Denison is located in the heart of Granville, Ohio. Established in 1805 by settlers from Granville, Mass, the village of 3,500 residents is noted for its quaint New England-like charm and its beautiful surrounding countryside. The area is known as the "Welsh Hills," so named by nostalgic village forebears who hailed from Wales. Granville is situated in Licking County and is six miles from Newark, Ohio, the county seat.

Denison Edge

Located at 300 Marconi Street in downtown Columbus, Ohio, Denison Edge provides a hands-on, high touch learning environment where industry experts help liberal arts students and recent graduates acquire skills and knowledge. Courses for credit are not offered at this location but students can earn stackable skills and certifications to launch into their preferred career.

The Denison Edge is leased space in a commercial building. The building is accessible to the public during business hours and is secured after hours. Denison relies on the Columbus Police Department and the Columbus Fire Department for public safety services at this location. Current Denison students continue to reside at the Granville, Ohio campus and are either shuttled by the university to the location or drive their personal vehicles.

Denison University Office of Campus Safety: Origins, Authority and Mission

The Denison University Board of Trustees granted police authority to the Office of Campus Safety Police Chief in 1998 under Ohio Revised Code § 1713.50. The Director of the Office of Campus Safety leads a team of professionally trained dispatchers, administrative personnel, and non-sworn Community Service Officers. The mission of the Office of Campus Safety is to bear the responsibility for the safety and welfare of the Denison community, and to ensure a safe living, learning, and working environment through partnership with the Denison

students, faculty, and staff, and others in the local community. The Office provides information on safety-related topics, emergency phone numbers, guides, and procedures. The Office of Campus Safety is committed to professionalism, fairness, and community service. Strong community relations on and off campus are the cornerstone of the Office's effectiveness. The Director of the Office of Campus Safety is a commissioned police officer with authority to make arrests on Denison University property, but Community Service Officers have no arrest authority.

Coordination with Law Enforcement Agencies

As first responders, Denison's community service officers respond to emergency situations on campus. In most cases, these emergencies are handled with the resources available at Denison University. However, there are situations when the Office of Campus Safety collaborates with public safety partners that include the Granville Police Department, the Licking County Sheriff's Office, and the Granville Township Fire Department, who have concurrent jurisdiction within the Village of Granville and Licking County patrol areas.

A Memorandum of Understanding exists between Denison University and the Village of Granville which specifies that the Office of Campus Safety will investigate traffic accidents, infractions of university rules and regulations, and misdemeanor offenses that occur on campus. The Granville Police Department investigates felony crimes, any crime of violence, crimes involving physical harm, and any traffic crash involving a suspected impaired driver. Cooperative arrangements with local officials additionally include multi-jurisdictional investigations of alleged crimes, special events coordination, and joint training programs. Denison will cooperate with local, State, and federal agencies for the investigation of alleged criminal offenses.

Reporting Crimes and Other Emergencies

Denison encourages accurate and prompt reporting of all crimes to the Office of Campus Safety and to the appropriate law enforcement agencies. If you are a victim or witness of a crime, or if you need to report a fire, medical emergency, or other emergency, report to:

Denison University Campus Safety Level P1 of the Parking Garage 740-587-6777 (emergency)
740-587-0810 (dispatch)

Anonymously Report Crimes

My Denison – Helping Hands (top right-hand side of My Denison screen) to report a concern or crime anonymously

Licking County Emergency Center

911

Granville Police Department

141 E Broadway, Granville, OH 740-587-1234

Granville Township Fire Department

(740) 587-0261

The Office of Campus Safety communications dispatchers monitor (24 hours a day, 7 days a week, 365 days a year) all Denison's emergency communication systems including emergency and dispatch telephones, two-way radio systems, and a complex computerized building alarm system.

Dispatchers have the responsibility to promptly dispatch Campus Safety officers and to notify local emergency responders in the event of an emergency or to request assistance by the Granville Police Department.

Campus crime is a reality, and public apathy is a criminal's greatest ally. Suspicion is the only reason you need for calling Campus Safety, and you cannot assume that someone else has reported criminal activity. Whether you are the victim or observer, you should report a crime, suspicious activity, or other emergency on campus immediately. Remember that prevention is a shared responsibility between the University and its campus community members. In addition, you should report suspicious people or activities, traffic accidents, and public safety concerns to the Office of Campus Safety.

Suspicion of a crime does not require proof. If you suspect that a crime is being committed, call Campus Safety immediately. Denison students, faculty and staff may **anonymously report crimes** via My Denison by clicking the helping hands on the top right-hand side. Please note, however, that reports submitted anonymously or with limited information may limit Denison's ability to follow up on a concern. We urge campus community members and others to report as much information as possible and to provide a way for Denison to communicate in follow up.

Students may make a confidential report to the University Chaplain (pastoral counselor), or to Denison's professional counselors. Pastoral counselors and professional counselors are generally exempt from disclosing information when acting in their role of pastoral or professional counselor. Consequently, reports to pastoral or professional counselors may not be evaluated for timely warning consideration and may not be included in the daily crime log or included in annual crime data compilations.

Pastoral and professional counselors are trained by the University to notify those with whom they are counseling of the voluntary, confidential crime reporting options available to them.

Denison Community Relations/Crime Prevention Programs

Educational Programs

The Office of Campus Safety uses a variety of methods and programs designed to teach Denison community member's strategies for enhancing community safety and to involve law enforcement and security resources when needed. Community Relations programs are, in some instances, scheduled throughout the year at the request of campus community members, and in other instances, as part of routine university programming. Following is a representative list of these programs:

Liaison Program – Denison Community Service Officers serve as liaisons to Residential Communities staff, student groups/organizations, and to Athletics teams, to address a variety of public safety issues unique to each group and organization. Officers also provide resources and partner with groups to arrange programs for their organization.

Ride Along Program – This program permits the student to get a first-hand look at patrolling and allows for face-to-face interaction between the rider and the officer.

Motorist Assist Program – This service provides individuals with vehicle jump-starts.

Personal Safety Programs – Campus Safety will arrange for interested individuals and groups to participate in personal safety and security programs. Topics include general theft prevention, auto related crimes, consumer

fraud/scams, rape and sexual assault prevention, and self-defense techniques.

Rape Aggression Defense-R.A.D. – RAD is a unique 12-hour self-defense course for women, focusing on women’s safety and self-defense techniques that are designed to empower women. The course also covers risk awareness and risk reduction as well as campus and local resources for counseling.

Emergency Telephones – Blue light emergency phones are located throughout the University campus. The phones are connected to the Office of Campus Safety’s 24-hour dispatcher, and when activated identify the location of a phone used to place a call should the caller be unable to talk. The phones can be used to request an escort, report suspicious activity, and report crimes.

Rave Guardian – Campus Safety has partnered with Rave Guardian to offer a free personal safety app designed to help Campus Safety prevent incidents and minimize response times. Functioning as a personal blue-light phone, our campus safety app enables students and faculty to send distress signals or report threats, hazards or medical emergencies directly to Campus Safety personnel. As SOS alerts come in from members of the campus community, Campus Safety can act faster helping ensure the safety, security and well-being of the entire campus.

Safe Ride – This program provides a ride or foot escort anywhere on campus from 6pm to 2am, 7 days a week.

Defensive Driving – Defensive Driving is a program offered by Campus Safety to help ensure the safety of our students, faculty, and staff while operating University vehicles. This program consists of an informational slide presentation, and a physical driving test, as well as driving record check to approve drivers to operate University vehicles.

Fraternity & Sorority Life Advising Circles – The Office of Campus Safety participates in advising circles to build relationships with students and to address public safety issues relative to their activities.

Social Media – Campus Safety maintains a Facebook page located at <http://www.facebook.com/denisonsafety>. The Facebook page provides information regarding Campus Safety services and provides helpful community information.

Crime Prevention and Security Awareness Programs

A common theme of all safety awareness programs is to encourage community members to be an active participant in their own safety. The Office of Campus Safety works closely with the Office of Student Life in developing and conducting security, safety orientation, and education programs for students. Security awareness programs on personal safety, property protection, crime prevention techniques, crime reporting, and emergency procedures are presented upon request.

The Office of Campus Safety plays an important role during summer orientation programs by presenting safety information to matriculating students and parents. Printed information on a wide range of security and safety topics is available to students during education and orientation sessions. Posters highlighting personal security and safety tips are posted in all residence halls and academic buildings as a reminder that community members need to assist in providing secure and safe conditions for all members of the Denison community. The Granville Township Fire Department provides orientation training on fire safety for all residence hall staff.

All incoming students and new employees will receive training on the prevention of dating violence, domestic violence, sexual assault, and stalking. Training will include:

- Information on Denison’s prohibition on dating violence, domestic violence, sexual assault, and stalking, and the Ohio Revised Code definitions of each

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- The definition of consent
 - A description of safe and positive options for bystander intervention
 - Information on risk reduction
 - Information on Denison's criminal and university-based investigation process.

In addition, Denison will conduct ongoing prevention and awareness campaigns for students and employees, including programming, initiatives, and strategies that are sustained over time and focus on increasing understanding of topics relevant to and skills for addressing dating violence, domestic violence, sexual assault, and stalking, using a range of strategies with audiences throughout the institution and including information described in this section.

Illness/Injury Response

Report emergency medical conditions to the Office of Campus Safety at (740) 587-6777 or directly to 911.

If a member of the campus community suffers illness or injury, the University can provide first response by a Campus Safety officer and assist in obtaining medical care. Campus Safety officers are trained in first aid, CPR and the use of Automated External Defibrillators (AED), which are standard equipment in Campus Safety vehicles. Granville Township Fire Department, located in the Village of Granville is a fully equipped emergency medical response agency with trained paramedics on duty. In addition, during the academic year, the Health and Wellness Center at the Hoaglin Wellness Center is open from 8am-8pm weekdays and from 10am-4pm on weekends. The Hoaglin Wellness Center houses medical and counseling staff and can be reached by phone at (740) 587-6200. A physician is in attendance for weekday clinic hours and is on call for emergencies. The Center is closed during college holidays.

Theft Prevention

Although the statistical reporting of theft offenses is not required by the Clery Act, the Office of Campus Safety believes that the college community should be aware of and guard against the theft of property. It is important for all of us to understand our role in the reduction of crime. For any crime to occur, three elements must be present: desire, ability and opportunity. The community's greatest strength in the prevention of crime is our initiative to remove or eliminate the opportunity for a crime to occur.

Daily Crime Log

The Office of Campus Safety is responsible for maintaining a Daily Crime Log. This log records specific information about crimes that occur, or are alleged to have occurred, on campus including the date the crime was reported, the date and time the crime occurred, the nature of the crime, the general location, and the disposition of the complaint if known.

Campus Safety makes entries or an addition to an entry to the log within two business days of the report of the information to Campus Safety, unless that disclosure is prohibited by law or would jeopardize the confidentiality of the victim.

Campus Safety may withhold information if there is clear and convincing evidence that the release of the information would jeopardize an ongoing criminal investigation or the safety of an individual; cause a suspect to flee or evade detection; or result in the destruction of evidence. Denison will disclose any information withheld once the adverse effect is no longer likely to occur. Denison will withhold only that information that would cause the adverse effects.

The most recent 60-day period of the crime log is open for public inspection during normal business hours, Monday to Friday, 8:30 am to 4:30 pm. You may view a printed copy of this report at the Denison University Office of Campus Safety located on the P1 level of the Parking Garage. Portions of the log older than 60 days will be made available within two business days of a request for public inspection.

Emergency Response and Evacuation Procedures

Emergency response and evacuation procedures are tested annually. The Office of Campus Safety is the designated initial contact for reporting all emergency situations and for response to and resolution of all emergencies. Upon receiving the report of an emergency, the responding officer will respond to the scene to investigate. The responding officer will assess the scene and, if there is an ongoing danger to the community, the officer or on-duty dispatcher will notify command staff members so that an emergency notification can be issued.

In some emergencies, such as severe weather, utility failures, etc., an evacuation or closure of the campus may be ordered. A campus evacuation or closure is an organized withdrawal from campus facilities where the time of return is determined by the circumstances of the emergency. When such action is warranted, the campus will be appropriately advised.

The University conducts at least one emergency response exercise each year, and periodically tests the emergency notification systems on campus. These tests are designed to assess and evaluate the emergency plans and capabilities of the University, and coordination with local emergency response agencies.

Emergency Notification Procedures

An emergency notification, or Denison University Alert, will be issued to the campus community upon confirmation of a significant emergency or dangerous situation occurring that involves an immediate threat to the health or safety of students or employees. When a determination has been made that an emergency notification should be issued, the Office of Campus Safety will take one or more of the following steps to ensure the Emergency Notification is appropriately communicated to the campus community or impacted segment of the campus community:

- Electronic Messaging through Denison’s mass notification system. Denison utilizes the Rave® Guardian system to allow authorized personnel to send a recorded voice message, e-mail, and SMS text message simultaneously from a remote site. These messages are typically sent by the Office of Campus Safety but may be sent by designated members of the University Communications team. All students are automatically enrolled in the Rave mass notification system.
- Voice Commander outdoor warning system: The system has prerecorded messages and the capability to deliver a live message that will reach anyone outside on the campus.
- Local Media: The Office of University Communications coordinates with all major media outlets to provide emergency notifications.
- Campus Safety Cruiser Public Address Systems: Campus Safety vehicles are equipped with public address systems that can be used to give emergency action instructions.
- Campus Information line (740-587-5700) provides a pre-recorded message about weather-related emergencies and closures.
- The Denison University website (<http://www.denison.edu>) is updated regularly with pertinent information and instructions in the event of a disaster or emergency.

Emergency Notifications shall contain important information about the emergency, and recommended actions as appropriate.

When it is necessary to provide emergency communications to the broader community, Denison works collaboratively with Granville Police Department, Granville Village Officials, Granville Township Fire Department, other local and State officials, and local media.

Building Evacuation

When a building evacuation occurs, it is most commonly because of the activation of the building fire alarm system. When the fire alarm sounds:

- Evacuate the building immediately, calmly, and quickly.
- Walk to the nearest exit/stairwell (close doors behind you).
- Do not use the elevators.
- Proceed to designated area outside the building, moving as far away from the building as possible.
- Do not re-enter the building until cleared by authorized personnel.

The Office of Campus Safety will schedule a test of emergency systems each academic year. The emergency notification system will be advertised regularly for the community to register for the alerts. In addition to advertising the emergency alerts, there will be information on any upcoming tests of emergency responses.

Timely Warnings

Timely Warnings, or Campus Safety Notices, are different from Denison University Alerts. Campus Safety Notices are generated to inform the campus community about crimes that are considered to represent a serious or continuing threat to students and employees and to aid in the prevention of similar crimes. Timely Warnings are generated by the Office of Campus Safety coordinating with university administrators and, when appropriate, local, state, and federal law enforcement agencies.

In evaluating what constitutes a serious or continuing threat, the Director of Campus Safety will consider factors including, but not limited to crime type, location, likelihood of reoccurrence, and time of initial reporting. Campus Safety Notices are typically released using the university email system to all students and employees. Timely Warnings may also be distributed by posting on Denison's home page or distributing warning fliers.

Campus Safety Notices will include information needed by the community for self-protection. This may include, but is not limited to, the nature of the reported crime, location, dates of occurrence, suspect description if applicable, and public safety reminders. Names and other identifying information of victims must be withheld as confidential.

The decision to issue a timely warning shall be decided on a case-by-case basis in compliance with the Clery Act and will consider all available facts. The timing of the notification shall be based upon the seriousness of the crime, whether there is a continuing, imminent threat to the safety and security of students or employees, and the possible risk of compromising law enforcement efforts.

Denison University Missing Student Notification Policy & Missing Student Procedures

Community members are encouraged to immediately report any student believed to be missing to the Office of Campus Safety. It is the policy of Denison University that all employees who receive information about a missing student must immediately refer the report to the Office of Campus Safety. The Office of Campus Safety does not consider any report of a missing person to be routine and will immediately investigate such reports.

Adult students, age 18 or above, have the option to designate a confidential emergency contact to be contacted not later than twenty-four (24) hours after the time the student is determined to be missing. Minor students, under the age of 18, must provide parent or guardian contact information as their emergency contact. Denison 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. This contact information will be accessible only to authorized campus officials and may not be disclosed except to law enforcement personnel in furtherance of a missing person investigation.

Students may register and update emergency and confidential contact information through the Office of Campus Safety. Each student who provides confidential contact information is solely responsible for the accuracy of the contact phone number and for updating the information should the confidential contact person and/or phone number change.

Missing Student Procedure

A student is determined to be missing when a report comes to the attention of the University and the University determines the report to be credible. Circumstances may include:

A student is out of contact after reasonable efforts to reach that student by phone calls, emails and/or in-person attempts to establish contact;

- Circumstances indicate an act of criminality is involved, even lacking twenty-four (24) hours in time.
- Circumstances indicate that physical safety is in danger, even lacking twenty-four (24) hours in time.
- Circumstances become known that medicine dependence may threaten life or health, even lacking twenty-four (24) hours in time.
- Existence of a physical/mental disability indicates that the student's physical safety is in danger, even lacking twenty-four (24) hours in time.

The Office of Campus Safety must be notified immediately by any employee aware of a missing person. The Office of Campus Safety will immediately investigate and determine if a student who is the subject of a missing report has been missing for more than 24 hours.

During the investigation, the following information should be established and documented in a Campus Safety report:

- Name and location/contact information of the person reporting the missing student.
- Name/vital information of the student reported to be out of contact.
- Nature of the circumstances supporting the determination that the student is out of contact (time /date last seen or in contact with the College).
- Avenues to establish that the student remains out of contact (failure to respond to phone, email, and in

person attempts to contact by a college official; parental notice or notice from reporting person outside the College; establishment of lapse in time of class attendance, affiliation with roommates and friends, or use of College facilities/services; concern of incident of criminality or safety, etc.) Dates and times of notifications made.

The Office of Campus Safety will inform the Student Life On-Call Professional after the officer's initial attempt to contact the student does not successfully establish contact or lead to information that results in actual contact being made with the student. Contact with the Director of Campus Safety and the Dean of Students or designee should take place as soon as reasonably practicable.

The Dean of Students, Director of Campus Safety, or their designee will contact the confidential contact within 24 hours of the determination that a student is missing. The emergency contact will be contacted if no confidential contact has been provided. These contacts may provide useful information as part of the investigation in attempting to locate the missing student reported missing.

The Office of Campus Safety will notify the Granville Police Department within 24 hours of the determination that a student is missing. Notification will occur sooner if it is established that avenues to contact the student have been exhausted or circumstances of criminality or safety are involved. Information about the context of the missing person report will be provided to the Granville Police Department upon their notification. The Office of Campus Safety will fully support requests of the Granville Police Department during their subsequent investigation.

Access to Campus Facilities: Safety and Security

Denison's campus is an open environment, allowing individuals to move about campus freely. This open environment makes all members of the University community responsible for immediately reporting suspicious activity to Campus Safety by calling 740-587-6777. Individual vigilance is essential in helping Campus Safety promote a safe campus and reduce crime. Individuals who do not have a legitimate reason for being on campus or in a University building, or who refuse to comply with a Campus Safety officer's request to leave, may be subject to arrest by Granville Police.

Academic and Administrative Buildings

Academic and administration buildings are open during regular business and class hours and may be open for extended periods during exam periods or for other special needs. After-hours access to academic and administration buildings is restricted to authorized persons. Access is controlled through an electronic card reader with data tracking. All authorized students, faculty, and staff must use their individual Denison photo identification card to gain entry.

Residence Halls

Entrances to University residence halls are locked twenty-four (24) hours a day and are equipped with electronic intrusion alarm devices to alert Campus Safety personnel of doors that have been propped open. Residential students gain entrance to most residence halls by an electronic card access system. Telephones are near the main entrance to residence halls to provide access to residents to emergency assistance. Residence hall rooms are equipped with smoke detectors integrated with the building alarm system; these are monitored by the Campus Safety dispatcher twenty-four (24) hours a day. Evacuation routes and severe weather instructions are posted throughout each residence hall. Denison students are responsible for their guests and should never allow strangers into the residence halls. Deliveries are to be made to the quad office on each residential quad. Students are encouraged to immediately report any maintenance deficiencies that may compromise building security to

Facilities Services (during business hours) and/or Campus Safety (nighttime hours).

Patrolling Campus Safety officers report safety concerns, such as lights that are not working, doors that may not be latching completely, and they work collaboratively with Facilities staff for repair. Members from Campus Safety, along with Facilities staff, walk the campus together in the evening each fall to look for areas that might need additional lighting or shrubs or bushes that need to be trimmed or removed.

Emergency Phones

Emergency phones are located throughout campus and are readily identifiable by a large blue and white lighted sign on top. In addition, exterior telephones are available for emergency use. They are located on the fronts of the academic buildings and residential halls. Emergency phones have automatic dialing capability and provide direct contact with a Denison University dispatcher. Each emergency phone has its own identifier on a separate switchboard that provides the dispatcher with the exact location of the caller. Such calls prompt the immediate dispatch of a Campus Safety officer.

Security Considerations in Maintenance

Student assistance is needed in reporting all security-related maintenance problems. Locks, doors, windows, and lights that are in need of repair or replacement or shrubbery in need of trimming should be reported immediately to Facilities Services. For any security-related maintenance problems while on campus at night, call Campus Safety at 6482. Security-related campus maintenance needs are given priority by Facilities Services.

Alcohol Policy

It is the intention of the university to provide an environment that fosters student development and autonomy. This can best be done by providing latitude for individual choice about personal use of alcohol. However, that freedom of choice exists with the understanding that university policy requires students to obey state and local laws, to comply with university alcohol policies, and to take full responsibility for their conduct. The University does not intend to police the personal lives of students or to invade their privacy, but it is a matter of university policy that state and local laws will be enforced. The University educates and disciplines students if their use of alcohol threatens to create disorder, public disturbances, injury to themselves or others, or damage to property. Every reasonable effort is made to enforce University alcohol policies consistently. Denison University provides alcohol education through workshops, peer groups and education by the staff of the Hoaglin Wellness Center.

In Ohio, one must be 21 years old to purchase, possess or drink alcohol. It is illegal for any person to possess an open container of alcohol in any public place or motor vehicle. Any sale of alcoholic beverages without a license is also prohibited. In accordance with the agreement between Denison University and the Granville Police Department, any incident where there is a suspicion of driving while under the influence (DUI) of alcohol or other drugs will be reported to the Granville Police Department for follow-up and investigation. Students found responsible for driving while under the influence of alcohol or other drugs will have their Denison parking registration and Defensive Driving certification revoked, in addition to any sanctions levied by Mayor's Court and/or the University conduct system.

Drug Policy

Denison University requires students by policy to obey state and federal laws that prohibit the use, possession and/or sale of illicit drugs. Students who possess or use illegal drugs on campus are subject to conduct action and to sanctions specified by the University conduct system. Trafficking (distribution or sale) of illegal drugs is cause

for suspension or expulsion and notice of such involvement is made to local law enforcement. All illegal drug activity is investigated by either the Office of Campus Safety or the Granville Police Department and offenders are referred through the Office of Community Values and Student Conduct and/or local courts for adjudication.

Nondiscrimination Policy

Denison University does not discriminate in its educational programs and activities on the basis of race, color, religion, ethnic or national origin, age, disability, sex, gender, gender identity, gender expression, sexual orientation, veteran status, or any other bases prohibited by law. If you have any questions about the non-discrimination policy (found online here: <http://www.denison.edu/forms/non-discrimination-policy>) or wish to make a report, please contact Human Resources (<http://www.denison.edu/campus/human-resources>).

Office of Human Resources

Denison University
Whisler Hall, (740) 587-6299
Monday - Friday, 8:30 a.m. - 4:30 p.m.

Title IX Notice: Sex discrimination is prohibited by federal law through Title IX of the Education Amendments of 1972. Denison does not discriminate based on sex in the education programs or activities that it operates including admissions and employment. Title IX also prohibits retaliation against reporters of sex discrimination, including reports of sex discrimination against administrators and other employees, and Denison will investigate alleged retaliation for participation in the Title IX process. Inquiries concerning the application of Title IX may be made to Denison's Title IX Coordinator and/or, the Assistant Secretary of the United States Department of Education. Reports of sex discrimination, including sexual harassment, may be made to the Title IX Coordinator at any time at the contact information below and also as detailed in Denison's Title IX grievance and response procedures and processes found on Denison's Title IX website (<http://www.denison.edu/campus/title-ix>).

Title IX Office

Justin Brown, Title IX Coordinator Denison University
brownjm@denison.edu or titleix@denison.edu
740-587-6728

Ayana Hinton
Deputy Title IX Coordinator and Associate Provost for Diversity, Equity, and Inclusion
hintona@denison.edu
740-587-6327

Sara Lee
Deputy Title IX Coordinator and
Senior Associate Director of Athletics
lees@denison.edu
740-501-4030

The Student's Responsibility

Students are encouraged to be active participants in their own safety and security. They must assume responsibility for their personal belongings by taking simple, common-sense precautions. Room doors should be locked at night and when the room is unoccupied. Serial numbers for valuable items such as computers, cameras and televisions should be recorded.

Safety Escort Program

The Safety Escort Program (supervised by the Office of Campus Safety and using trained student employees) provides a walking or motorized escort service for student residents on campus. This service is available to staff and faculty upon request. The Safety Escort Program is in operation seven days a week from 8 a.m. until 2 a.m. during the academic year. Call 740-587-6623 for this service.

Personal Security Recommendations:

- Never walk alone at night. Call Security Escort Program (6623). Use sidewalks.
- Refrain from taking shortcuts. Walk where there is plenty of light and traffic.
- Lock your door—even if you are only going to the rest room or into the room next door. A surprising number of thefts from residence hall rooms are accomplished while the resident is on the same floor but has just stepped out for “a minute.” The risk is great. It only takes seconds to walk into your open room and steal your valuables.
- Lock your door when you are asleep.
- Do not prop open outside building doors that are supposed to be locked. These doors are locked for your protection, as well as that of everyone residing in the hall.
- Do not lend your keys or residence hall access card to anyone. They may not be as careful with them as you are and may lose or misplace them, just long enough for the wrong person to gain possession.
- Do not leave your keys or residence hall access card lying around in public places or in your coat or jacket when you are not wearing it.
- Refer to residence hall informational postings from Campus Safety for additional security and safety information (e.g., severe weather instructions, personal security and safety tips).

Preventing Sex Discrimination and Sexual Misconduct, Including Domestic Violence, Dating Violence, Sexual Assault, and Stalking

Denison University is committed to fostering a climate free from sex discrimination, harassment, and sexual misconduct, including dating violence, domestic violence, sexual assault, and stalking, and to taking the necessary action to prevent and respond to improper conduct. The University will promptly respond and investigate all reports of alleged dating violence, domestic violence, sexual assault, or stalking. Student and employees found responsible through University proceedings will be subjected to disciplinary action up to and including expulsion or termination. Denison uses a preponderance of evidence standard to determine whether or not alleged conduct constitutes dating violence, domestic violence, sexual assault, or stalking.

Denison University's Discrimination and Sexual Misconduct Policy provides information about the university's commitment to the prevention and prohibition of conduct involving sex and gender discrimination, sexual harassment, and sexual misconduct and details information about reporting options, supportive measures, resources, processes for responding to and adjudicating reports, and the procedures Denison will follow when crimes are reported. The full and most current Sex Discrimination and Sexual Misconduct Policy may be found at <http://www.denison.edu/forms/policy-prohibiting-sex-discrimination> or attached as Appendix A at the end of this report.

Procedures under this policy provide for prompt, fair, and impartial process from the initial investigation to the

final result. Further, the processes shall be conducted by officials that receive annual training on the issues related to dating violence, domestic violence, sexual assault, and stalking and on how to conduct an investigation and hearing process that protects the safety of victims and promotes accountability; provide the accuser and the accused with the same opportunities to have others present during any institutional disciplinary proceeding, including the opportunity to be accompanied to any related meeting or proceeding by the advisor of their choice; not limit the choice of advisor or presence for either the accuser or the accused in any meeting or institutional disciplinary proceeding (however, there are restriction detailed in the policy regarding the extent to which the advisor may participate in the proceedings, and these apply equally to both parties; and require simultaneous notification, in writing, to both the accuser and the accused, of : (A) the result of any institutional disciplinary proceeding that arises from an allegation of dating violence, domestic violence, sexual assault, or stalking; (B) the institution's procedures for the accused and the victim to appeal the result of the institutional disciplinary proceeding, if such procedures are available; (C) Any change to the result; and (D) When such results become final.

Procedures Victims Should Follow if a Crime of Dating Violence, Domestic Violence, Sexual Assault, or Stalking Has Occurred

It is extremely important to preserve evidence that may assist in proving that the alleged criminal offense occurred or may be helpful in obtaining a protection order. Procedures for victims, including contact information for appropriate offices, can be found on the university Title IX webpage (www.denison.edu/campus/title-ix/reporting-options). Individuals may report these offenses to any of the following:

- Civil Rights & Title IX, to request a university investigation and/ or to seek supportive measures (Civil Rights & Title IX is mandated by State law to report felony crimes to local law enforcement). Report offenses to Justin Brown, Title IX Coordinator in person, by email, or calling.
 - brownjm@denison.edu or titleix@denison.edu
 - 740-587-6728

- Campus Safety (Campus Safety may provide immediate protections and help secure crime scenes. Campus Safety will refer criminal offenses of dating violence, domestic violence, sexual assault, and stalking to law enforcement. The same offenses may be prohibited behavior under University policies and will be referred to the Title IX Office). Report to Campus Safety in person or by calling.
 - Level P1 of the Parking Garage
 - 740-587-6777 (emergency)
 - 740-587-0810 (dispatch)

- Granville Police (Granville Police may receive reports of dating violence, domestic violence, sexual assault, and stalking) Report to Campus Safety in person or by calling.
 - 141 E Broadway, Granville, OH
 - 740-587-1234

Victims are provided a copy of a document titled, "Information for Complainants regarding a Report of Sex Discrimination or Sexual Misconduct." This document includes information on both confidential and non-confidential resources available, including off-campus resources; information on the right to and role of advisors; brief descriptions of the options for resolution through Denison, including alternate resolution and formal resolution; and information about submitting a formal complaint to the Title IX Coordinator. This document also highlights the importance of reporting crimes to local law enforcement but informs the victim that such notification is not required by the university. It informs the victim that the Title IX Coordinator and/or Campus

Safety is available to assist victims in notifying law enforcement authorities if the victim so chooses. Denison University and the Village of Granville have a memorandum of understanding stating that all crimes of this nature will be investigated by the Granville Police Department and not by Denison Campus Safety. However, Denison Campus Safety is an option for initial reporting for victims as a means to coordinate with the Granville Police Department. Victims are also provided information, in writing, about the importance of preserving evidence that may assist in proving that the alleged criminal offense occurred or that may be helpful in obtaining a protection order.

When a student or employee reports to the institution that the student or employee has been a victim of dating violence, domestic violence, sexual assault, or stalking, whether the offense occurred on or off campus, the institution will provide the student or employee a written explanation of the student's or employee's rights and options.

Information about How the Institution Will Protect the Confidentiality of Victims and Other Necessary Parties

University records related to complaints and response of dating violence, domestic violence, sexual assault, or stalking will be maintained by the designated office that received and responded the complaint. Complaints against students and employees resulting in disciplinary or personnel will also be a part of the respondent's disciplinary or personnel record. All records are confidential with access only to individuals with a legitimate need to know. Records of complaints will be kept on file in accordance with the University's records and retention policy. In addition, the University will maintain as confidential, any accommodations or protective measures provided to the victim to the extent that maintaining such confidentiality would not impair the ability of the University to provide the accommodations or protective measures.

Denison will complete publicly available records including the Clery Act reporting and disclosures, that include the crime statistics contained within this publication, and the daily crime log maintained by Campus Safety without the inclusion of personally identifying information about the victim.

Resources

Reporting Sex Discrimination and Sexual Harassment

Denison encourages prompt reporting of harassment and discrimination. To make a report about possible discrimination, sexual harassment or sexual misconduct, a party or any third party should notify the Title IX Coordinator or Deputy Title IX Coordinators. A report may be made at any time, including during nonbusiness hours, in person, by telephone, by mail, by email, or by completing the online reporting form using the contact information listed for the Title IX Coordinator(s).

Title IX Coordinator and Deputy Coordinators

The Title IX Coordinator has been designated and authorized to coordinate the University's efforts to address concerns relating to discrimination and harassment on the basis of sex, gender, gender identity, sexual orientation. This includes conduct within the scope of Title IX and other sexual misconduct, as well as retaliation against individuals in connection with allegations or proceedings. Any person may report conduct prohibited, including conduct within the scope of Title IX and other sexual misconduct, (and whether or not the person reporting is the person who experienced the alleged misconduct), at any time, including non-business hours, by contacting the Title IX Coordinator or a Deputy Title IX Coordinator

The Title IX Coordinator and Deputy Coordinators coordinate closely with other university departments, including Human Resources, Residential Life, health and counseling services, International Student Services, and Campus Safety to connect students and employees to the appropriate sources of legal remedies or protective measures. The Title IX Coordinator can provide information about existing counseling, health, mental health, victim advocacy, legal assistance, visa and immigration assistance, student financial aid, and other services available for victims, both within the institution and in the community. Below is contact information for the Title IX Coordinator and Deputy Coordinators, and resources for victims.

Title IX Coordinator:

Justin Brown, Title IX Coordinator
brownjm@denison.edu or titleix@denison.edu
740-587-6728

Title IX Deputy Coordinators:

Sara Lee, Associate Director of Athletics Mitchell Center 228
100 West University Street Granville, Ohio 43023 lees@denison.edu
740-587-6290

Ayana Hinton
Deputy Title IX Coordinator and Associate Provost for Diversity, Equity, and Inclusion
hintona@denison.edu
740-587-6327

Confidential Reporting Resources

Counselors, medical health providers, clergy, and certified rape crisis counselors generally will not share information about the person seeking support without the person's consent. For further details about and exceptions to this confidentiality, see our [Sex Discrimination and Sexual Misconduct policy](#).

Counseling Resources Clergy

Denison Religious and Spiritual Life/ Gilpatrick House (for students)
(740) 587-8583
(<https://denison.edu/campus/religious>)

Granville Area Churches (for students and employees)
(<https://granvillenchamber.com/around-the-%20region/area-churches/>)

Denison Health & Wellness Center Counseling Staff (for students) Counseling Center services are available free of charge to all students.

Hoaglin Wellness Center
For appointments, call (740) 587-6200
24/7 Crisis Counseling (740) 587-6647

New York Life's Life Assistance (Employee Assistance for all employees)

<https://my.denison.edu/system/files/inline-files/LAP%20Customer%20Flyer.pdf>

Health and Medical Services

Denison Health & Wellness Center Medical Staff (for students)

Hoaglin Wellness Center

(740) 587-6200

Additional Non-Confidential Reporting Resources

A trusted university faculty member, staff member, and coach, as well as student Community Assistant (CA) and Community Coordinator (CC) can be a good resource to speak with. However, per Denison's Sex Discrimination and Sexual Misconduct policy, these employees are mandatory reporters, which means they are required to report all behavior that may constitute sexual assault and other sexual misconduct, intimate partner violence or stalking to the Title IX Office. However, it generally remains up to the reporting person if they wish to file a formal complaint and ask the University to pursue further action. For more information about the University's process to investigate and adjudicate cases, please see the Response and Process for Reports section of Denison's [Title IX website](#) and the [Sex Discrimination and Sexual Misconduct policy](#).

Emergency Medical Services (for students and employees)

Dial 911

(740) 587-6777 Denison emergency operator

General information about health care benefits (for employees)

Denison Human Resources (for employees) Doane Administration 307

740-587-6299

<https://denison.edu/campus/human-resources>

Student Financial Aid

Doane Administration - 1st Floor 740-587-6276

<https://denison.edu/campus/admission>

Legal Assistance

Ohio State Bar Association

1700 Lake Shore Dr., Columbus, OH 43204 [\(800\) 282-6556](tel:8002826556)

<https://www.ohiobar.org/>

Columbus Bar Association

175 S 3rd St UNIT 1100, Columbus, OH 43215

[\(614\) 221-4112](tel:6142214112)

http://www.cbalaw.org/cba_prod

Visa and Immigration Assistance

Denison University International Student Service (for students) Burton D. Morgan Center 417

Email: iss@denison.edu

<https://my.iss.denison.edu/>

Denison Human Resources (for employees) Doane Administration 307

740-587-6299

<https://denison.edu/campus/human-resources>

Community Support and Advocacy Resources

Sexual Assault Response Network of Central Ohio (SARNCO) 3820 Olentangy River Rd, Columbus, OH 43214
[614\) 267-7020](tel:6142677020)
<https://www.ohiohealth.com/community-health/sarnco>

Family Health Services of East Central Ohio (800) 688-3266,
(740) 344-9291
100 McMillen Drive, Newark, OH 43055

The Woodlands, Center for New Beginnings Shelter (Dating Violence) (740) 349-7066
195 Union Street, Suite B-1, Newark, OH 43055 <http://www.thewoodland.org/center-for-new-beginnings/>

Buckeye Region Anti-Violence Organization (BRAVO) (614)294-7867
(866) 862- 7286
<http://www.bravo.equitashealth.org/> <http://www.bravo.equitashealth.org/>

CHOICES Columbus (Domestic Violence Services) (614) 224-4663 (24hr hotline)

Rape, Abuse & Incest National Network (RAINN) (800) 656-4673
<http://www.centers.rainn.org/>

Information on Denison's Disciplinary Procedures

Conduct within the scope of Title IX will be addressed under the procedures required by federal law and outlined in the Sex Discrimination and Sexual Misconduct Policy, which is included below. If an employee is alleged to have engaged in sexual assault, dating violence, domestic violence, or stalking that is not within the scope of Title IX, the matter may be resolved under the procedures in the appropriate staff or faculty handbook.

If a student is alleged to have engaged in sexual assault, dating violence, domestic violence, or stalking but none of the allegations against them fall within the scope of Title IX, the matter will be resolved pursuant to a modified version of the procedures described in the Code of Student Conduct. Under these modified procedures, the Case Manager would be selected by the Title IX Coordinator and is not required to be a staff member within the Office of Community Values and Student Conduct (OCVSC) or Residential Communities & Housing; the role of the Hearing Officer or University Conduct Board would be fulfilled by a single trained decision-maker who is assigned by the Title IX Coordinator and may be an external institutional partner rather than an employee; and the appeal decision-maker would be the Associate Vice President/Dean of Student Life or their designee. Furthermore, the procedures used would be compliant with the Clery Act, as modified by VAWA, and would include equivalent rights of appeal among other required modifications. For all other allegations against students that fall outside the scope of Title IX, the matter may be resolved pursuant to the procedures described in the Code of Student Conduct, by OCVSC.

Regarding timelines, Denison aims to complete any investigation involving allegations of sexual assault, dating violence, domestic violence, or stalking within 60 days, regardless of the applicability of Title IX. However, the nature of these investigations is such that more time is sometimes required. For the Title IX process, the steps that follow are the formal hearing and decision-making process (approximately 30 days), and the appeal process (approximately 14 days). For student cases not covered by Title IX, the investigation is followed by a meeting with the decision-maker and a subsequent decision regarding responsibility (if the respondent has denied the allegations) and any sanctions that are appropriate (if the respondent admitted to one or more violations or was found responsible by the decision-maker); this process can take up to 30 days to complete. Respondents and complainants can appeal these decisions, and such appeals are typically resolved within 14 days. For non-faculty employees whose allegations are not covered by Title IX, the investigation is followed by a decision regarding

responsibility and any necessary corrective action, typically within 30 days, and there is no appeal option. Full-time faculty who are facing involuntary dismissal have a hearing with an Advisory Board, which makes recommendations to the President. If the President's decision is affirmed by the Executive Committee of the Board of Trustees, the faculty respondent may appear before the Executive Committee and request a review. The timelines associated with this process are unpredictable and can take several months to complete. The timeliness associated with this process can vary. However, Denison aims to complete this process in as timely a manner as possible.

University proceedings under the Sex Discrimination and Sexual Misconduct Policy are conducted in compliance with the requirements of Title IX, the Clery Act, as amended by VAWA, the Family Educational Rights and Privacy Act (FERPA), and state and federal law, as applicable. No information shall be released from such proceedings except as required or permitted by law and University policy.

The Sex Discrimination and Sexual Misconduct Policy will be applied in a manner that is consistent with both law and the University's principles of academic freedom. Denison is committed to the free and vigorous discussion of ideas and issues, which the University believes will be protected by this policy. Academic freedom and the related freedom of expression include, but are not limited to, the civil expression of ideas, including controversial ideas, in the classroom, residence halls, and other teaching and student communal environments.

Education and Promotion Campaigns Promoting Awareness and Prevention of Sexual Misconduct Including Dating Violence, Domestic Violence, Sexual Assault, and Stalking

The University proactively seeks to prevent all forms of sex discrimination, and sexual misconduct including dating violence, domestic violence, sexual assault, and stalking. Denison prohibits the crimes of dating violence, domestic violence, sexual assault, and stalking as defined herein. The University offers a variety of training and education programs for the prevention of sexual misconduct. Topics include, but are not limited to:

Primary Prevention and Awareness programs

Incoming first year students were provided training through Get Inclusive's *Voices for Change – Alcohol and Consent* online module. Employees, including faculty, were provided training through Vector Solutions' *Preventing Harassment and Discrimination* online course. Both of these programs included:

- Information on Denison's prohibition on dating violence, domestic violence, sexual assault, and stalking, and the definitions of each;
- The definition of consent;
- A description of safe and positive options for bystander intervention;
- Information on risk reduction, and;
- Information on Denison's criminal and university-based investigation process.

Ongoing prevention and awareness programs

Denison offers a variety of educational opportunities for students and employees, including programming, initiatives, and strategies that are sustained over time and focus on increasing understanding of topics relevant to and skills for addressing dating violence, domestic violence, sexual assault, and stalking, using a range of strategies with audiences throughout the institution.

For example, the student group SHARE (Sexual Harassment and Assault Resource Education), with support from the institution, offers a Helping Hands workshop multiple times each year that covers important definitions, bystander intervention strategies, and information on helping friends and loved ones who have experienced trauma due to sexual violence. During the 2022 calendar year, this workshop was held on March 28, April 18, September 27, October 24, November 7, and November 29. SHARE also held a Take Back the Night event on October 7, 2022, led a Cookies and Consent program on April 25, 2022, and as part of their End Rape on Campus

Speaker Series, hosted speaker Veronica Agard to lead a conversation on diverse identities and centering joy within the survivor and advocacy communities.

The group DCSR (Denison Coalition for Sexual Respect) also hosted educational and preventative programs such as a Fireside chat on sexual health and sexual respect and a flower crown event during which they provided Denison-specific statistics and information on DCSR's role in working with the Title IX Coordinator.

As a final example, the Hoaglin Wellness Center, in partnership with the above groups, hosted a lively, interactive program entitled "Sex Discussed Here!" on September 15, 2022, in which sex educators discussed sexual health and healthy relationships.

For more information or to become involved in education and promotion campaigns promoting awareness and prevention of sexual misconduct including dating violence, domestic violence, sexual assault, and stalking contact:

Civil Rights and Title IX

Justin Brown, Title IX Coordinator

brownjm@denison.edu or titleix@denison.edu

740-587-6728

Campus Sex Offender Information

The goal of the Campus Sex Crimes Prevention Act was to require sex offenders to provide notice of enrollment or employment at any higher education institution. It is important the campus community know where it can obtain this information about registered sex offenders provided by the State. The State of Ohio provides such information electronically. The direct web address to obtain this is at www.icrimewatch.net/ohio.php

Definition of Clery Act Reportable Crimes

Denison must include in its crime statistics crimes defined in this section occurring on or within its Clery geography that, occur within the calendar year, and that are reported to a campus security authority or provided by local or jurisdictional police agencies. Denison makes a reasonable, good-faith effort to obtain statistics for crimes that occurred on or within

the institution's Clery geography local or jurisdictional police agencies. Clery provides that the institution is not responsible for the failure of local or jurisdictional police agencies to supply the required statistics.

The Clery Act allows an institution to withhold, or subsequently remove, a reported crime from its crime statistics in the rare situation where sworn or commissioned law enforcement personnel have fully investigated the reported crime and, based on the results of this full investigation and evidence, have made a formal determination that the crime report is false or baseless and therefore "unfounded." Only sworn or commissioned law enforcement personnel may "unfound" a crime report for purposes of reporting under this section. The recovery of stolen property, the low value of stolen property, the refusal of the victim to cooperate with the prosecution, and the failure to make an arrest do not "unfound" a crime report. Denison must disclose in its annual security report statistics the total number of crime reports listed in this section that were "unfounded" and subsequently withheld from its crime statistics during each of the three most recent calendar years. Denison has no "unfounded" reports, as described above, in 2021, 2020, and 2019.

Clery Criminal Offenses

Criminal Homicide - Manslaughter by Negligence

The killing of another person through gross negligence.

Criminal Homicide - Manslaughter by Negligence

The willful (non-negligent) killing of one human being by another.

Rape

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.

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.

Aggravated Assault

An unlawful attack by one person upon another for the purpose of inflicting severe or aggravated bodily injury. This type of assault usually is 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.)

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.

Motor Vehicle Theft

The theft or attempted theft of a motor vehicle, including motor vehicle theft where automobiles are taken by persons not having lawful access even though the vehicles are later abandoned - including joyriding.

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.

Dating Violence

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

Domestic Violence

The term "domestic violence" includes felony or misdemeanor crimes of violence committed by a current or former spouse of the victim; by a person with whom the victim shares a child in common; by a person who is

cohabitating with or has cohabitated with, the victim as a spouse or intimate partner; by a person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction in which the crime of violence occurred; or by any other person against an adult or youth victim who is protected from that person's acts under the domestic or family violence laws of the jurisdiction in which the crime of violence occurred.

Stalking

The term "stalking" means engaging in a course of conduct directed at a specific person that would cause a reasonable person to (1) fear for the person's safety or the safety of others; or (2) suffer substantial emotional distress.

For the purpose of the definition of stalking:

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

Sex Crimes

Fondling

The touching of the private body parts of another person for the purpose of sexual gratification, forcibly and/or against that person's will; or, not forcibly or against the person's will where the victim is incapable of giving consent because of his/her youth or because of his/her temporary or permanent mental incapacity.

Incest

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

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

Hate Crime

A criminal offense that manifests evidence that the victim was intentionally selected because of the perpetrator's bias against the victim. Bias is a preformed negative opinion or attitude toward a group of persons based on their race, gender, religion, disability, sexual orientation or ethnicity/national origin. Under the Clery Act, the following categories of bias included as hate crimes:

- Race
- Gender
- Gender identity
- Religion
- Sexual orientation
- Ethnicity
- National origin

- Disability

Hate crimes include any of the aforementioned Clery reportable offenses and/or any of the following additional crimes reported to local police agencies or to a campus security authority that manifests evidence that the victim was intentionally selected because of the perpetrator's bias against them (only counted in crime statistics if it is a component of a hate crime):

Hate Crimes (only counted if a component of a hate crime) 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.

Simple Assault

An unlawful physical attack by one person upon another where 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.

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.

Destruction/Damage/Vandalism of Property

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.

Other Offenses

The following criminal offenses (violations of law) are disclosed in the Clery Crime Statistics of this publication, but only for the number of persons referred for disciplinary action and the number arrests are disclosed through the Annual Security Report. For the purpose disclosure of crime statistics in this publication, an arrest is defined as persons processed by arrest, criminal citation, or summons; and referred for disciplinary action is defined as the referral of any person to any official who initiates a disciplinary action of which a record is established, and which may result in the imposition of a sanction.

Weapons: Carrying, Possessing, Etc.

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.

Drug Abuse 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.

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.

Consent

Consent (in reference to sexual activity under Ohio jurisdiction)

Ohio does not specifically define “consent.” However, for the purpose of preventing resistance, consent cannot be obtained if the offender substantially impairs the other person's judgment or control by administering any drug, intoxicant, or controlled substance to the other person surreptitiously or by force, threat of force, or deception.

The other person's ability to resist or consent is substantially impaired because of a mental or physical condition or because of advanced age, and the offender knows or has reasonable cause to believe that the other person's ability to resist or consent is substantially impaired because of a mental or physical condition or because of advanced age.

Consent for sexual conduct cannot be obtained from another when the offender purposely compels the other person to submit by force or threat of force. A victim need not prove physical resistance to the offender.

A person who is eighteen or older cannot obtain consent for sexual activity from someone under the age of sixteen even if the person who is a minor wanted to engage in sexual activity. A person under the age of thirteen cannot consent to sexual activity under any circumstance.

Consent (defined by Denison policy for sexual harassment offenses under Title IX)

The University considers consent voluntary agreement through words or action freely given, which could be reasonably interpreted as a willingness to participate in sexual activity. Indications that consent is not present include: when physical force is used or there is a reasonable belief of the threat of physical force; when duress is present; when one individual overcomes the physical limitations of another individual; and when an individual is incapable of making an intentional decision to participate in a sexual act, which could include instances when the individual is in a state of incapacitation (defined below). Important points regarding consent include:

- Silence or an absence of resistance does not necessarily indicate consent.
- Consent on a prior occasion does not constitute consent on subsequent occasions, and consent cannot be inferred solely by the existence of a past sexual or dating relationship.
- Consent must exist throughout the sexual encounter and can be withdrawn or modified at any time, and consent to one form of sexual activity does not automatically imply consent to other forms of sexual activity.
- A person cannot obtain consent from someone who is incapacitated. Under Ohio State law and incorporated into this Policy, a person who is eighteen or older cannot obtain consent for sexual activity from someone under the age of sixteen even if the person who is a minor wanted to engage in sexual activity. A person under the age of thirteen cannot consent to sexual activity under any circumstance.

Definition of Clery Act Reportable Locations

Crimes defined above must be reported by location. The following are the location types that are included in crime reporting statistics, and the definitions of each property type.

On-Campus Locations

Any building or property owned or controlled by an institution within the same reasonably contiguous geographic area and used by the institution in direct support of, or in a manner related to, the institution's educational purposes, including residence halls; and any building or property that is within or reasonably contiguous to campus that is owned by the institution but controlled by another person, is frequently used by students, and supports

institutional purposes (such as a food or other retail vendor).

Residential Facilities

Residential Facility locations are a subset of On-campus locations. These include any student housing facility that is owned or controlled by the institution, or is located on property that is owned or controlled by the institution, and is within the reasonably contiguous geographic area that makes up the campus is considered an on-campus student housing facility.

Non-Campus Locations

Student organizations do not maintain non campus locations. Denison Edge is a leased property in Columbus, Ohio that is used in direct support of the institution's educational purposes, is frequented by Denison students, and is not reasonably contiguous to the Denison campus. Criminal activity at the Denison Edge property will be reported to the Office of Campus Safety by staff and faculty that work onsite. Crime statistics are requested annually from the Columbus Police Division, which has jurisdiction over the area. If the Office of Campus Safety learns of criminal activity involving students or student organizations at an Off-Campus location, it will coordinate with the appropriate external law enforcement agency to forward information about the situation to the Office of Community Values and Student Conduct, and/or the Title IX Office as appropriate.

Denison will monitor and record criminal activity by students at non-campus locations of student organizations officially recognized by the institution, including student organizations with non-campus housing facilities through the cooperation of local police agencies in the area of the non-campus location.

Public Property

All public property, including thoroughfares, streets, sidewalks, and parking facilities, that is within the campus or immediately adjacent to and accessible from the campus.

Clery Criminal Offenses

Offense	Year	On Campus		Non Campus Property	Public Property
		Total number including Residential Facilities	Only in Residential Facilities		
Criminal Homicide - Manslaughter by Negligence	2020	0	0	0	0
	2021	0	0	0	0
	2022	0	0	0	0
Criminal Homicide – Murder and Nonnegligent Manslaughter	2020	0	0	0	0
	2021	0	0	0	0
	2022	0	0	0	0
Rape	2020	10	9	0	0
	2021	15	14	0	0
	2022	7	7	0	0
Fondling	2020	2	2	0	0
	2021	4	4	0	0
	2022	5	5	0	0
Incest	2020	0	0	0	0
	2021	0	0	0	0
	2022	0	0	0	0
Statutory Rape	2020	0	0	0	0
	2021	0	0	0	0
	2022	0	0	0	0
Robbery	2020	0	0	0	0
	2021	0	0	0	0
	2022	0	0	0	0
Aggravated Assault	2020	0	0	0	0
	2021	3	0	0	0
	2022	1	1	0	0
Burglary	2020	4	2	0	0
	2021	7	2	0	0
	2022	5	3	0	0
Motor Vehicle Theft	2020	0	0	0	0
	2021	0	0	0	0
	2022	0	0	0	0
Arson	2020	1	0	0	0
	2021	2	2	0	0
	2022	3	1	0	0
Domestic Violence	2020	0	0	0	0
	2021	0	0	0	0
	2022	0	0	0	0
Dating Violence	2020	3	3	0	0
	2021	2	2	0	0
	2022	1	1	0	0
Stalking	2020	4	4	0	0
	2021	12	11	0	0
	2022	7	5	0	0

Other Offenses: Arrests and Disciplinary Referrals for Weapons Law Violations, Drug Abuse Violations, and Liquor Law Violations

Offense	Year	On Campus		Non Campus Property	Public Property
		Total number including Residential Facilities	Only inside Residential Facilities		
Arrests for Weapons (carrying, possessing, etc.)	2020	0	0	0	0
	2021	0	0	0	0
	2022	0	0	0	0
Disciplinary Referrals for Weapons (carrying, possessing, etc.)	2020	0	0	0	0
	2021	0	0	0	0
	2022	0	0	0	0
Arrests for Drug Abuse Violations	2020	3	0	0	0
	2021	1	1	0	0
	2022	0	0	0	0
Disciplinary Referrals for Drug Violations	2020	54	41	0	0
	2021	52	51	0	0
	2022	50	46	0	0
Arrests for Liquor Law Violations	2020	0	0	0	0
	2021	1	0	0	0
	2022	0	0	0	0
Disciplinary Referrals for Liquor Law Violations	2020	72	50	1	0
	2021	78	55	0	0
	2022	47	37	0	2

Hate Crimes

Offense	Year	On Campus		Non Campus Property	Public Property
		Total number including Residential Facilities	Only in Residential Facilities		
Hate Crimes	2020	0	0	0	0
	2021	0	0	0	0
	2022	0	0	0	0

Denison University Annual Fire Safety Report **2022**



Annual Fire Safety Report

Purpose

This report provides information and data pertaining to fire safety on the campus of Denison University. The data and information contained in this document are reported annually in compliance with legal requirements set forth by the Higher Education Opportunity Act.

An institution that maintains any on-campus student housing facility must prepare an annual fire safety report that contains, at a minimum, the following information:

- The fire statistics.
- A description of each on-campus student housing facility fire safety system.
- The number of fire drills held during the previous calendar year.
- The institution's policies or rules on portable electrical appliances, smoking, and open flames in a student housing facility.
- The institution's procedures for student housing evacuation in the case of a fire.
- The policies regarding fire safety education and training programs provided to the students and employees. In these policies, the institution must describe the procedures that students and employees should follow in the case of a fire.
- For purposes of including a fire in the statistics in the annual fire safety report, a list of the titles of each person or organization to which students and employees should report that a fire occurred.
- Plans for future improvements in fire safety, if determined necessary by the institution.

Campus Safety

Call the Office of Campus Safety to report unauthorized fires and fire emergencies at (740) 587-6777. Campus Safety is the primary point of contact for fires or any other emergencies on campus. They are available to respond 24 hours a day, 7 days a week.

Denison University Campus Safety maintains a Daily Fire Log regarding fire incidents. The log includes information about the nature, date, time, and general location of each fire. Campus Safety records this information within two business days from receipt of the information. The Clery Act regulation requires an institution make the fire log for the most recent 60-day period open to public inspection during normal business hours. The institution must make any portion of the log older than 60 days available within two business days of a request for public inspection. The log is also used to compile annual fire statistics included in this publication. For purposes of including a fire in the statistics in the annual fire safety report, student and employees should report all fire incidents to the Office of Campus Safety

Granville Township Fire Department

Individuals may also report fire emergencies to the Granville Township Fire Department by calling 911.

The Granville Township Fire Department (GTFD) proudly serves around 14,000 residents including The Village of

Granville, Granville Township, and the majority of McKean Township in Central Licking County. Within the response area, the GTFD protects Denison University, as well as a geographically diverse area of historical Granville, newer developments, and rural areas.

Emergency medical services (EMS) account for 75 percent of the Granville Township Fire Department operation. Two GTFD ambulances are staffed with three paramedics and transport residents to a number of destinations, including Licking Memorial Hospital, as well as numerous Columbus area hospitals. Medical necessity, patient preference when possible, and resource management determine transport destination.

Residence Hall Fire Safety

Denison University is committed to educating students, faculty and staff in safe practices as they relate to fire safety. Two fire drills are conducted in each residence hall each calendar year, typically one in the fall and spring. These drills educate and empower our students, staff and visitors with the familiarization required to evacuate in the event of an actual fire on campus. These drills highlight exit locations, stairwell access, protective actions and safe areas of refuge away from the impacted building. Each year, head residents and resident assistants are required to attend training that includes information about their duties and responsibilities during fire alarms and fire drills.

Education and training assists students and staff in developing the confidence and knowledge required to safely act during the event of a fire or other emergency. Evacuations are mandatory for all students in residence halls when a fire alarm is activated. Failure to evacuate is a violation of the student code of conduct and will result in sanctions.

Cooking is strictly prohibited in student rooms. Cooking is only allowed in apartment style kitchens and community accessible kitchens or kitchenettes. These kitchenettes are designed for reheating meals, snack preparation, but not full meal preparations.

Posting of signs, posters, written or printed information or flyers on front lobby doors, windows and window frames, inside stairwells or on stairwell doors could impede, hinder, disorient or obstruct someone in their attempt to exit the building in an emergency. Therefore, postings in these areas is prohibited. Student room doors both inside and outside may not be covered to excess with paper or other combustible material.

In order to avoid potentially dangerous traffic situations, hallways, lobbies, stairwells and common areas must be kept free of obstruction at all times. For example, trash bags, bicycles, furniture, personal effects or other items may not be left in places where they impede, block or hinder exit from the building, especially during an emergency evacuation.

Fire Safety Education

All First-Year Students during August Orientation are educated about fire safety regulations by many means, including PowerPoint presentations, videos, actual hands-on training and instructions on how to use fire extinguishers. Students have been exposed to training where harmless smoke is introduced in a building and the students attempt to evacuate in simulated fire conditions. The Granville Township Fire Department offers this

annual training. In addition, all students are made familiar with fire safety and evacuation procedures during their first residence hall floor meetings. All residence halls have fire safety and evacuation information posted on each floor on bulletin boards for students to be able to reference. Twice each year fire drills are conducted in each residence hall so that residents can make sure they know how to safely evacuate during a fire.

In the event of a fire alarm activation in any residence hall or campus building, all students required to:

- Exit the building without delay as soon as possible.
- While exiting, assist others that may need assistance.
- Do not reenter the building unless directed to do so by staff.
- After exiting the building call Campus Safety to inform them as much as you know about the situation.
- If you observe smoke or fire make sure you inform Campus Safety and/or the Fire Department as soon as possible. -

The following information is provided to students to protect themselves before a fire starts:

- Identify at least two exits when you are in any building before an emergency in case the exit you entered is inaccessible.
- Count the number of steps to the exits where your room is located so if you cannot see to exit you know how many steps it takes to reach the exits.
- Locate life safety equipment (fire extinguishers, alarm pull stations, smoke detectors) before you need to use them in an emergency.

Fire Policies

Fire and Life-Safety Policy

Fires present a real and possible threat to life-safety in our residence halls and other campus facilities. Students are expected to protect the welfare of themselves, their peers, other members of the community, and property. Students will not engage in any open burning without appropriate authorization from the University. The University will likely suspend or expel any student who engages in arson or who creates conditions for a fire to occur or to continue.

Students found to have tampered with fire or other life-safety equipment (e.g. smoke detectors, alarm horns, fire sprinklers, and fire extinguishers), intentional activation of any alarm or safety system, or intentional false report, warning or threat of fire or other life safety emergency or violate other fire and life safety polices may be subjected to disciplinary action up to and including expulsion.

During fire or other life-safety emergencies or drills, or upon receipt of an emergency notification, students are expected to cooperate with regulations and authorities by evacuating buildings immediately upon alarm and proceed to designated areas.

Portable Electrical Devices

Students may not use appliances with an open heating coil, including microwave ovens, hot plates, electric skillets, electric grilling machines (e.g. George Foreman-style grills), toasters, toaster ovens, and rice or pressure cookers

in residence hall rooms without a designated kitchen area. Students who reside in areas with community kitchens may use appliances in the community kitchen and may store personal kitchen items in their rooms when not in use. All students may possess and use electric coffee makers that include an automatic shut-off feature; coffee makers without this feature are not permitted. University personnel may grant or prohibit access to community spaces, including community kitchens, at any time.

Smoking and Vaping

Denison is a smoke-free environment. Students, faculty and staff are prohibited from smoking tobacco products, or vaping in any interior areas of the campus, including classrooms, labs, private offices, restrooms, hallways, dining rooms, residential facilities, including students' assigned rooms, in the parking garage. Students, faculty, staff, and visitors may smoke tobacco products, or vape in outdoor locations, except near any entryway, open window or air handling equipment.

Open Flames

Open flames, including candles and incense are prohibited in all residence halls. Individuals found to have intentionally caused open flames may be subjected to disciplinary action up to and including expulsion or termination.

Prohibited Items

Because of the fire and life-safety risks associated with these items in a community setting, possession or use of the following items is strictly prohibited in the residence halls:

- Candles, unless electronic (non-burning), or if the candle's wick is unburned/in-tact or removed.
- Incense and potpourri burners.
- Extension cords of the non-power strip variety.
- Weapons, including all life-like and replica weapons, as well as all Airsoft type pistols/rifles, which are considered weapons for the purposes of this regulation.
- Waterbeds, hot tubs, pools, and other basins used to store water in quantities larger than ten gallons.
- Ceiling fans or other added electrical fixtures of any kind.
- Space heaters.
- Knives, except kitchen knives or ordinary pocketknives having a blade of three or fewer inches.
- Hazardous chemicals and flammable or combustible materials, including but not limited to: gasoline, charcoal fluid, lighter fluid, and propane gas tanks.
- Fireworks, including but not limited to sparklers, firecrackers, and smoke bombs, or other incendiary devices of any kind (see University's Fire and Life Safety policies).
- Animals: no animals are permitted within university facilities except for fish in an aquarium of a maximum size of ten gallons, or service or Emotional Support Animals with advance written approval from the Academic Resource Center after completing the application process the semester prior. Violations of the ESA policy can result in revocation of privileges.
- Air conditioner units: neither window-installed or free-standing units are permitted unless an advance health exemption is granted through the Hoaglin Wellness Center, and approved units must be installed by University Physical Plant staff, with the student assuming the costs of installation and removal.
- Lofts: use of lofts or platforms in the residence halls is prohibited. Upon request, the University

provides appropriate equipment to students who wish to elevate their beds in select halls. Due to furniture type and/or ceiling height or other building restrictions, the lofting of beds in Pratt, Good, Brown, Myers, and Schaff halls is prohibited.

- Kitchen appliances
- Live Tapestries, posters, curtains, and other items shall not be hung from or affixed to ceilings.
- Drapes, tapestries, beads, or other items that block egress from the room into the hallway are not permitted, as these pose a significant hazard in the event of a fire.
- Decorations may not interfere with safe passage or evacuation from any room or common area.
- Interior and exterior doors may not be covered to the edges with paper or other flammable materials (e.g., fabric).
- Electrical lights must be UL-approved (Underwriters Laboratories) and the UL sticker must be intact. Additionally, only lights of the small-bulb or rope variety may be used. Large-bulb strand lighting is prohibited due to their high fire risk. Holiday lighting or any other item shall not be attached near or around fire- or other life-safety fixtures, including (but not limited to) fire sprinkler heads and smoke detectors. Lighting may be inspected by the University at any time, and may be removed if deemed inappropriate, excessive, or improperly installed.
- Neither live nor cut trees are permitted in any campus building, including the residence halls. This includes the use of wreaths or garland that is constructed from live tree material. Any such item will be confiscated and discarded. The University defines a “tree” as any tree, limb, or branch thereof or any device, however constructed, that is intended to imitate or simulate any such tree used for decoration purposes. Students may use and decorate artificial trees in residence hall rooms, provided they are certified as fire resistant. Metallic trees may be lighted only by indirect spot lighting.

Procedures for Student Housing Evacuation in Case of a Fire

When an alarm sounds, by order of Campus Safety, emergency alert, or by order of the fire department or law enforcement, all individuals that are inside student housing must immediately evacuate the building using the closest route to an exit, and report to the designated assembly area. Building emergency procedures are posted throughout each building that lists the designated assembly area. Some residential facilities have local alarms, just in the room, typically in apartments with kitchens. When a local alarm sounds, residence in that room must immediately evacuate and call Campus Safety at 740-587-6777. If there is any reason to believe the situation in the room with local alarm could endanger other occupants, then the evacuees should pull the emergency alarm station when exiting.

Fire Prevention

The University strives to promote safety on campus and works to implement programs aimed at preventing fires and the devastating impacts they may have on our campus community. All members of the campus community, including students, faculty, staff, and visitors can contribute to fire prevention and safety; working together we can make this a safer campus for all to enjoy.

Fire Drills

The Office of Campus Safety conducts routine fire drills in all residence halls. Fire drills may be announced or unannounced. In 2021, Denison conducted two fire drills in each residence halls.

Fire Safety Systems

Fire safety systems provide containment, monitoring, central notification, fire suppression, and local alarms. All residence halls are equipped with central monitoring of fire safety systems that is monitored by the Denison Office of Campus Safety dispatch center 24/7/365. Almost all residence halls have automatic fire suppression, residence hall safety features are detailed in the table below. Other fire systems include fire rated doors, automatic closing doors separating fire areas in the building, and fire extinguishers.

Residence Hall Fire Safety Features 2022

Building	Address	Alarm Mfg.	Type	Monitored Smoke Alarms	Automatic Sprinkler System
Schaff House	500 North Loop	Fire-Lite	Addressable	Yes	Yes
Beaver Hall	200 East Loop	Fire-Lite	Addressable	Yes	Yes
Bancroft House	555 North Pearl St	Fire-Lite	Addressable	Yes	Yes
Beta House	700 North Loop	Fire-Lite	Addressable	Yes	No
Chamberlin	900 North Loop	Fire-Lite	Addressable	Yes	Yes
Crawford Hall	400 East Loop	Silent Knight	Addressable	Yes	Yes
Curtis East	200 Sunset Hill	Fire-Lite	Addressable	Yes	Yes
Curtis West	300 Sunset Hill	Fire-Lite	Addressable	Yes	Yes
East Hall	600 East Loop	Fire-Lite	Addressable	Yes	Yes
Elm, Lower	1000 Ebaugh Dr	Fire-Lite	Addressable	Yes	Yes
Elm, Upper	1050 Ebaugh Dr	Fire-Lite	Addressable	Yes	Yes
Gilpatrick	500 Chapel Dr	Fire-Lite	Addressable	Yes	Yes
Hayes Hall	1150 Chapel Dr	Fire-Lite	Addressable	Yes	Yes
Homestead 3	300 Alrutz Rd	Fire-Lite	Addressable	Yes	Yes
Homestead 2	200 Alrutz Rd	Fire-Lite	Addressable	Yes	Yes
Huffman Hall	450 Chapel Dr	Fire-Lite	Addressable	Yes	Yes
Kappa Sigma	500 Washington Dr	Fire-Lite	Addressable	Yes	No
King Hall	150 N Plum St.	Fire-Lite	Addressable	Yes	Yes
Morrow House	600 North Loop	Fire-Lite	Addressable	Yes	Yes
Preston House	300 North Loop	Fire-Lite	Addressable	Yes	Yes
Sawyer Hall	300 East Loop	Fire-Lite	Addressable	Yes	Yes
Shaw Hall	100 East Loop	Fire-Lite	Addressable	Yes	Yes
Shepardson Hall	500 East Loop	Fire-Lite	Addressable	Yes	Yes
Shorney	1000 West Loop	Fire-Lite	Addressable	Yes	Yes
Moshier Huchinson	400 North Loop	Fire-Lite	Addressable	Yes	Yes
Smith Hall	1100 West Loop	Fire-Lite	Addressable	Yes	Yes
Stone Hall	100 North Plum	Fire-Lite	Addressable	Yes	Yes
Pratt Hall	500 Sunset Hill	Fire-Lite	Addressable	Yes	Yes
Brown Hall	600 Sunset Hill	Fire-Lite	Addressable	Yes	Yes
Myers Hall	700 Sunset Hill	Fire-Lite	Addressable	Yes	Yes
Good Hall	800 Sunset Hill	Fire-Lite	Addressable	Yes	Yes
Silverstein	900 Sunset Hill Dr	Fire-Lite	Addressable	Yes	Yes
Sunset House	400 Sunset Hill	Fire-Lite	Addressable	Yes	Yes
Taylor House	200 North Loop	Fire-Lite	Addressable	Yes	Yes
Wright Hall	1100 Ebaugh Dr	Fire-Lite	Addressable	Yes	Yes

Residence Hall Fires 2022

Building	Address	Number of Fires	Cause	Number of Injuries	Number of fatalities	Property Damage Value
Beaver	200 East Loop	0	NA	0	0	\$0
Beta House	700 North Loop	0	NA	0	0	\$0
Brown Hall	600 Sunset Hill Rd	0	NA	0	0	\$0
Chamberlin	900 North Loop	0	NA	0	0	\$0
Crawford Hall	400 East Loop	0	NA	0	0	\$0
Curtis East	200 Sunset Hill Rd	0	NA	0	0	\$0
Curtis West	300 Sunset Hill Rd	1	NA	0	0	\$0
East Hall	600 East Loop	1	NA	0	0	\$0
Elm, Lower	1000 Ebaugh Dr.	1	NA	0	0	\$0
Elm, Upper	1050 Ebaugh Dr.	0	NA	0	0	\$0
Gilpatrick	500 Chapel Dr.	0	NA	0	0	\$0
Good Hall	800 Sunset Hill Rd	0	NA	0	0	\$0
Hayes Hall	1150 Chapel Dr	0	NA	0	0	\$0
Homestead 3	300 Alrutz Rd	0	NA	0	0	\$0
Homestead 2	200 Alrutz Rd	0	NA	0	0	\$0
Huffman Hall	450 Chapel Dr.	0	NA	0	0	\$0
Kappa Sigma	500 Washington Dr.	0	NA	0	0	\$0
King Hall	150 N Plum	0	NA	0	0	\$0
Morrow House	600 North Loop	0	NA	0	0	\$0
Moshier Huchinson	400 North Loop	0	NA	0	0	\$0
Myers Hall	700 Sunset Hill Rd	1	NA	0	0	\$100
Preston House	300 North Loop	0	NA	0	0	\$0
Sawyer Hall	300 East Loop	1	NA	0	0	\$0
Schaff House	500 North Loop	0	NA	0	0	\$0
Shaw Hall	100 East Loop	0	NA	0	0	\$0
Shepardson Hall	500 East Loop	0	NA	0	0	\$0
Shorney Hall	1000 West Loop	0	NA	0	0	\$0
Silverstein Hall	900 Sunset Hill Dr	0	NA	0	0	\$0
Smith Hall	1100 West Loop	0	NA	0	0	\$0
Stone Hall	100 North Plum	0	NA	0	0	\$0
Sunset House	400 Sunset Hill Rd	0	NA	0	0	\$0
Pratt Hall	500 Sunset Hill Rd	0	NA	0	0	\$0
Taylor House	200 North Loop	0	NA	0	0	\$0
Wright Hall	1100 Ebaugh Dr	0	NA	0	0	\$0

Definitions for Fire Safety Terms

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 mandatory evacuation of a building for a fire.

Fire log – An institution that maintains on-campus student housing facilities must maintain a written easily understood fire log that records, by the date that the fire was reported, any fire that occurred in an on-campus student housing facility. This log must include the nature, date, time and general location of each fire. An institution must make an entry or an addition to an entry to the log within two business days of the receipt of the information. An institution must make the fire log for the most recent 60-day period open to public inspection during normal business hours. The institution must make any portion of the log older than 60 days available within two business days of a request for public inspection. An institution must make an annual report to the campus community on the fires by the annual safety report.

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.

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 statistics – An institution must report statistics for each on-campus student housing facility for the three most recent calendar years for which data are available, concerning the number of fires and the cause of each fire, the number of persons who received fire-related injuries that resulted in treatment at a medical facility, including at an on-campus health center, and the number of deaths related to a fire and the value of property damage caused by a fire.

Value of property damage – The estimated value of the loss of the structure and contents, in terms of the cost or replacement in like kind and quantity. This estimate should include contents damaged by fire and related damages caused by smoke, water and overhaul, however, it does not include indirect loss, such as business interruption.

Appendix A: Denison Sex Discrimination and Sexual Misconduct Policy

Denison University Sex Discrimination and Sexual Misconduct Policy

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I. Policy Scope and Application

Denison University is committed to fostering a climate free from sex discrimination, harassment, and sexual misconduct, and to taking the necessary action to prevent and respond to improper conduct. This policy conforms to legal requirements and applies to students, staff, and faculty.

The University provides education and prevention resources; offers support services and guidance to reporting parties, complainants, respondents, or other affected community members; and has implemented procedures for reviewing and responding to conduct prohibited by this policy.

In 2020, the U.S. Department of Education promulgated new regulations under Title IX of the Education Amendments Act of 1972. These regulations establish definitions of Title IX sexual harassment and misconduct, and limit the scope of Title IX misconduct to, among other things, conduct that occurs within the United States and conduct that occurs within the University's education program or activities (concepts further defined below).

The University (and other laws) also prohibit types of sexual misconduct that do not fall under the new definitions of Title IX misconduct.

This policy addresses the definitions and procedures governing both (1) sex discrimination, sexual harassment, and misconduct covered by Title IX and (2) sex discrimination, sexual harassment, and misconduct that does not fall under the scope of Title IX (including conduct that would otherwise be prohibited under Title IX but does not meet the federally-prescribed jurisdictional requirements).

The University's Director of Civil Rights and Title IX will coordinate the University's compliance with this policy and reports related to sex discrimination, sexual harassment, and sexual misconduct, and allegations of retaliation in connection with claims or proceedings under this policy.

Conduct within the scope of Title IX will be addressed under the procedures required by federal law and outlined below. If an employee is alleged to have engaged in conduct prohibited by this Policy but that is not within the scope of Title IX, the matter may be resolved under the procedures in the appropriate staff or faculty handbook.

If a student is alleged to have engaged in sexual harassment, sexual assault, dating violence, domestic violence, or stalking but none of the allegations against them fall within the scope of Title IX, the matter will be resolved pursuant to a modified version of the procedures described in the Code of Student Conduct. Under these modified procedures, the Case Manager would be selected by the Title IX Coordinator and is not required to be a staff member within the Office of Community Values and Student Conduct (OCVSC) or Residential Communities & Housing; the role of the Hearing Officer or University Conduct Board would be fulfilled by a single trained decision-maker who is assigned by the Title IX Coordinator and may be external institutional partner rather than an employee; and the appeal decision-maker would be the Associate Vice

President/Dean of Student Life or their designee. Furthermore, the procedures used would be compliant with the Clery Act, as modified by VAWA, and would include equivalent rights of appeal among other required modifications.

For all other allegations against students that fall outside the scope of Title IX, the matter may be resolved pursuant to the procedures described in the Code of Student Conduct, by OCVSC.

University proceedings under this Policy are conducted in compliance with the requirements of Title IX, the Clery Act, as amended by VAWA, the Family Educational Rights and Privacy Act (FERPA), and state and federal law, as applicable. No information shall be released from such proceedings except as required or permitted by law and University policy.

This policy will be applied in a manner that is consistent with both law and the University's principles of academic freedom. Denison is committed to the free and vigorous discussion of ideas and issues, which the University believes will be protected by this policy. Academic freedom and the related freedom of expression include, but are not limited to, the civil expression of ideas, including controversial ideas, in the classroom, residence halls, and other teaching and student communal environments.

A. Title IX Coordinator and Deputy Coordinators

Denison's Director of Civil Rights and Title IX has been designated the Title IX Coordinator, to coordinate the University's efforts to address concerns relating to discrimination and harassment on the basis of sex, gender, gender identity, and sexual orientation. This includes conduct within the scope of Title IX and other sex discrimination or sexual misconduct addressed by this policy, as well as retaliation against individuals in connection with allegations or proceedings related to this policy.

Any person (whether or not the reporting party is the person who experienced the alleged misconduct) may report conduct prohibited by this policy, including conduct within the scope of Title IX and other sexual misconduct described herein, at any time, including non-business hours, by contacting the Title IX Coordinator or a Deputy Title IX Coordinator as follows:

Title IX Coordinator:

Justin Brown, Director of Civil Rights & Title IX
Slayter Hall Student Union, 409
100 West College Street
Granville, Ohio 43023
brownjm@denison.edu
(740) 587-6728

Title IX Deputy Coordinators:

Sara Lee, Senior Associate Director of Athletics
Mitchell Center 228
100 West College Street
Granville, Ohio 43023
lees@denison.edu
(740) 587-6290

Ayana Hinton, Associate Provost for Diversity, Equity, and Inclusion
Doane Admin – 201
100 West College Street
Granville, Ohio 43023
hintona@denison.edu
(740) 587-6327

B. Glossary of Terms

Actual knowledge: Actual knowledge is notice of conduct that may constitute a violation of this policy provided to the University's Title IX or Deputy Title IX Coordinators. It also includes the following University officials who have authority to institute corrective measures on behalf of Denison: the Provost, the Associate Vice President for People and Culture, and the Director of Community Values and Student Conduct.

Complainant: A Complainant is an individual who is alleged to be the victim of conduct that could constitute a violation of this policy.

Consent: The University considers consent voluntary agreement through words or action freely given, which could be reasonably interpreted as a willingness to participate in sexual activity. Indications that consent is not present include: when physical force is used or there is a reasonable belief of the threat of physical force; when duress is present; when one individual overcomes the physical limitations of another individual; and when an individual is incapable of making an intentional decision to participate in a sexual act, which could include instances when the individual is in a state of incapacitation (defined below). Important points regarding consent include:

- Silence or an absence of resistance does not necessarily indicate consent.
- Consent on a prior occasion does not constitute consent on a subsequent occasion, and consent cannot be inferred solely by the existence of a past sexual or dating relationship.
- Consent must exist throughout the sexual encounter and can be withdrawn or modified at any time, and consent to one form of sexual activity does not automatically imply consent to other forms of sexual activity.
- A person cannot obtain consent from someone who is incapacitated.

Under Ohio state law and incorporated into this Policy, a person who is eighteen or older cannot obtain consent for sexual activity from someone under the age of sixteen even if the person who is a minor wanted to engage in sexual activity. A person under the age of thirteen cannot consent to sexual activity under any circumstance.

Incapacitation: Incapacitation (or incapacity) is the state in which an individual's perception or judgment is so impaired that the individual lacks the cognitive capacity to make or act on conscious decisions to engage in sexual activity.

- States of incapacity include sleep, unconsciousness, intermittent consciousness, physical helplessness, or any state in which an individual is not fully aware what is occurring.
- A person who is incapacitated is unable to give consent to participate in sexual activity. To engage in sexual activity with a person whom one knows or should know is incapacitated constitutes sexual misconduct and violates this policy.
- Under this policy, determinations as to whether a person should have known that another person was incapacitated shall be objectively based on what a reasonable sober person would have known about the condition of the incapacitated person in the same situation.
- Incapacitation is not the same as an alcohol-induced "blackout." An alcohol-induced blackout is defined as a lack of memory for events occurring after consuming alcohol without a loss of consciousness.
- Whether a person knew or should have known of another's incapacitation requires assessment of how alcohol is affecting the other person's:
 - Ability to make decisions and exercise judgment;
 - Awareness of surroundings and consequences of actions;
 - Ability to appreciate the nature of any sexual acts and circumstances surrounding the acts
- Factors that a person may use to determine incapacitation include, but are not limited to:
 - Slurred speech
 - Lack of motor skills or balance
 - Inability to focus
 - Confusion
 - Vomiting
 - Emotional volatility or reactivity
 - Unusual behavior
 - Bloodshot eyes
 - Smell of alcohol on breath
- Alcohol or other drug use is one of the primary causes of incapacitation. Incapacitation is a state beyond drunkenness or intoxication. A person is not necessarily incapacitated solely as a result of drinking or using drugs; the level of impairment must be significant enough to render a person unable to consent.
- Evaluating incapacitation requires an assessment of whether a Respondent knew or should have known of the Complainant's incapacitation based on objectively and reasonably apparent indications of impairment when viewed from the perspective of a sober, reasonable person in the Respondent's position.

Being impaired by alcohol or other drugs is not a defense to any violation of this policy.

Respondent: A Respondent is defined as an individual, unit, or group that has been reported to be the perpetrator of conduct that could violate this policy.

Title IX Coordinator: The Title IX Coordinator is the employee, or employees, designated to coordinate Denison's efforts to comply with Title IX and its regulations found in Part 106 of Title 34 of the Code of Federal Regulations.

Title IX Dismissal: If the conduct alleged in a formal complaint does not constitute sexual harassment as defined under Title IX, did not occur in a University educational program or activity, or did not occur against a person in the United States, the University must dismiss the formal complaint with regard to that conduct for purposes of sexual harassment under Title IX. When a complaint is dismissed under Title IX, it may still be subject to action under other University policies, such as the Code of Student Conduct and employee or faculty handbooks. It can also be resolved through the Alternate Resolution Process as described in Section VII.

II. Definitions of Prohibited Conduct

The following definitions are forms of sex and gender discrimination, sexual harassment, and sexual assault and misconduct prohibited by this Policy, the Code of Student Conduct, and the Anti-Harassment policies for faculty, administrators, and staff ("Prohibited Conduct"). Section IIIA describes conduct that will be considered at a live hearing process described in Section V.

A. Title IX Sexual Harassment

The Title IX Regulations define "sexual harassment" to mean conduct on the basis of sex that satisfies the definition of one or more of the following: (1) quid pro quo; (2) unwelcome conduct that is severe, pervasive, and objectively offensive; (3) sexual assault as defined by federal law to include forcible and non-forcible sex offenses, (4) dating violence, (5) domestic violence, and (6) stalking. This Policy will refer to these definitions as "Title IX Sexual Harassment."

For reported behavior to qualify as Title IX Sexual Harassment, in addition to meeting the elements of the specific type of sexual harassment below, it must meet all of the following threshold requirements, as determined by the Title IX Coordinator and as mandated by federal regulations:

- The conduct must have occurred against a person in the United States.
- The conduct must have occurred within the University's education program or activity. For purposes of this provision, this means that the conduct must have occurred either (a) in a location, event, or circumstances over which the University exercised substantial control over both the Respondent and the context in which the sexual harassment occurs or (b) in relation to a building

owned or controlled by a student organization that is officially recognized by the University.

- The Complainant must be participating in or attempting to participate in the education program or activity of the University at the time the Formal Complaint is filed.¹

Conduct that does not meet these threshold requirements is subject to a Title IX Dismissal but will continue through the investigative process as described more fully in Section IV.

1. **Quid Pro Quo**

Quid pro quo sexual harassment occurs when an employee of Denison conditions the provision of aid, benefit, or service from Denison on a person's participation in unwelcome sexual conduct.

2. **Hostile Environment Sexual Harassment**

Conduct on the basis of sex that is unwelcome and determined by a reasonable person to be so severe, pervasive, and objectively offensive that it effectively denies a person equal access to Denison's educational program or activity.

3. **Sexual Assault**

Under the Title IX Regulations, the term "Sexual Assault" is defined as a forcible or non-forcible sex offense as classified under the Uniform Crime Reporting system of the FBI.² For the purposes of this Policy the following definitions will be used:

- a) **Penetrative Sexual Assault** – 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, including instances where the Complainant is incapable of giving consent because of their age or because of their temporary or permanent mental or physical incapacity.³

¹ While a complainant's participation or attempted participation in the University's education program or activity is typically a threshold requirement, there are limited situations in which a Title IX Coordinator may be required to file a formal complaint for Title IX Sexual Harassment even when the complainant is not participating in or attempting to participate in an education program or activity. For example, if the University has actual knowledge of a pattern of alleged sexual harassment by a perpetrator in a position of authority, the Title IX Coordinator may be required by Title IX to sign a formal complaint even if the purported complainant does not wish to file a formal complaint or participate in a grievance process. This is because the University has a Title IX obligation to provide all students, not just the Complainant in a particular case, with an educational environment that does not discriminate based on sex.

² The definitions used here are taken from the FBI UCR National Incident-Based Reporting System User Manual 2019.2 (Last visited June 6, 2020).

³ This definition combines the NIBRS definitions of rape, sodomy and sexual assault with an object. These definitions are as follows:

- b) **Fondling** – The touching of the private body parts of another person for the purpose of sexual gratification, without the consent of the victim, including instances where the victim is incapable of giving consent because of his/her age or because of his/her temporary or permanent mental or physical incapacity.
- c) **Incest** – Sexual intercourse between persons who are related to each other within the degrees wherein marriage is prohibited by law. In Ohio, Revised Code Section 3101.01(A) provides that individuals nearer of kin than second cousins may not marry.
- d) **Statutory Rape** – Sexual intercourse with a person who is under the statutory age of consent. In Ohio, no person may have sex with a child under the age of thirteen,⁴ nor may a person over the age of eighteen have sex with a child under the age of sixteen.⁵

4. Dating Violence

“Dating Violence” means an act of violence committed by a person who is or has been in a romantic or intimate relationship with the Complainant. The existence of such a romantic or intimate relationship is determined by the length of the relationship, the type of relationship, and the frequency of interactions between the individuals involved in the relationship. Acts of violence may include, but are not limited to: recklessly causing bodily injury; attempts to cause bodily injury; and causing fear of immediate, physical harm through threat of force.

5. Domestic Violence

The term “Domestic Violence” includes felony or misdemeanor crimes of violence committed by a current or former spouse or intimate partner of the victim, by a person with whom the victim shares a child in common, by a person who is cohabitating with or has cohabitated with the victim as a spouse or intimate partner, by a person similarly situated to a spouse of the victim under Ohio’s domestic or family violence laws or by any other person against an adult or youth victim who is protected from that person’s acts under the domestic or family violence laws of the jurisdiction.

Rape – The carnal knowledge of a person, 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 or physical incapacity. Carnal knowledge is defined as the slightest penetration of the sexual organ of the female (vagina) by the sexual organ of the male (penis).

Sodomy – Oral or anal sexual intercourse with another person, 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 or physical incapacity.

Sexual Assault With An Object – To use an object or instrument to unlawfully penetrate, however slightly, the genital or anal opening of the body of another person, 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 or physical incapacity. An object or instrument is anything used by the offender other than the offender’s genitalia, e.g., a finger, bottle, handgun, stick.

⁴ Ohio Revised Code Section 2907.02(A)(1)(b).

⁵ Ohio Revised Code Section 2907.04(A).

6. Stalking

The term “Stalking” means engaging in a course of conduct directed at a specific person that would cause a reasonable person with similar characteristics under similar circumstances to fear for their safety or the safety of others; or to suffer substantial emotional distress. A course of conduct includes two or more acts, including but not limited to, those in which the alleged perpetrator directly, indirectly, or through third parties, by any action, method, deice, or means, follows, monitors, observes, surveils, threatens, or communicates to or about the Complainant, or interferes with the Complainant’s property. Stalking governed by Title IX refers to stalking that is based on sex or gender.

B. Non-Title IX Sexual Harassment

For the purposes of this Policy, Non-Title IX Sexual Harassment means unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature when one of the following occurs:

- Submission to such conduct is made either explicitly or implicitly a term or condition of an individual’s employment or access by the individual to aid, benefits, or services;
- Submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting the individual or access by the individual to aid, benefits, or services; or
- Such conduct has the purpose or effect of unreasonably interfering with an individual’s job performance or learning ability or creating an intimidating, hostile, or offensive working environment.

C. Sexual Assault – Non-Title IX

Conduct that meets the definition of Sexual Assault in Section II.A (a) – (d)., above, but does not meet all of the threshold requirements to be charged under Title IX as listed in Section A above will be charged as Sexual Assault - Non-Title IX.

D. Dating Violence – Non-Title IX

“Dating Violence” means an act of violence committed by a person who is or has been in a romantic or intimate relationship with the Complainant. The existence of such a romantic or intimate relationship is determined by the length of the relationship, the type of relationship, and the frequency of interactions between the individuals involved in the relationship. Acts of violence may include, but are not limited to: recklessly causing bodily injury; attempts to cause bodily injury; and causing fear of immediate, physical harm through threat of force. Dating Violence under this provision does not meet all of the threshold requirements to be charged under Title IX as listed in Section II.A.

E. Domestic Violence – Non-Title IX

The term “Domestic Violence” includes felony or misdemeanor crimes of violence committed by a current or former spouse or intimate partner of the victim, by a person with whom the victim shares a child in common, by a person who is cohabitating with or has cohabitated with the victim as a spouse or intimate partner, by a person similarly situated to a spouse of the victim under Ohio’s domestic or family violence laws or by any other person against an adult or youth victim who is protected from that person’s acts under the domestic or family violence laws of the jurisdiction. Domestic Violence under this provision does not meet all of the threshold requirements to be charged under Title IX as listed in Section II.A or is not conduct on the basis of sex or gender.

F. Stalking – Non-Title IX

The term “Stalking” means engaging in a course of conduct directed at a specific person that would cause a reasonable person with similar characteristics under similar circumstances to fear for their safety or the safety of others; or to suffer substantial emotional distress. A course of conduct includes two or more acts, including but not limited to, those in which the alleged perpetrator directly, indirectly, or through third parties, by any action, method, deice, or means, follows, monitors, observes, surveils, threatens, or communicates to or about the Complainant, or interferes with the Complainant’s property. Stalking under this provision does not meet all of the threshold requirements to be charged under Title IX as listed in Section II.A or is not conduct on the basis of sex or gender.

G. Sex/Gender Discrimination

Discrimination occurs when a behavior or policy has the purpose or effect of restricting or denying an individual’s or group’s access to opportunities, programs, or resources in relation to sex, gender, gender identity, gender expression, or sexual orientation in a manner that interferes with an individual’s working, academic, residential, or social environment or athletic participation or performance.

Examples of discrimination include but are not limited to:

- Treated differently in determining whether such person satisfies any requirement or condition for the provision of any aids, benefits, or services;
- Provided different aid, benefits, or services;
- Provided aid, benefits, or services in a different manner;
- Denied any aids, benefits or services;
- Subjected to separate or different rules of behavior, sanctions or other treatment;
- Treated differently concerning the domicile or residence of a student or applicant;
- Discriminated against by providing significant assistance to any agency, organization or person which discriminates on the basis of sex in providing any aid, benefit, or service to students, faculty or employees;

- Otherwise limited in the enjoyment of any rights, privileges, advantages or opportunities with regard to aids, benefits or services; or
- Treated differently with regard to terms, conditions or benefits of employment, or in the recruitment, consideration or selection thereof.

Discrimination on the basis of sex/gender in employment is permissible in situations where sex/gender is a bona fide occupational qualification reasonably necessary to the normal operation of the University. Note that the federal regulations regarding Title IX include certain exceptions, such as single-gender housing, athletic participation and chorus participation that do not constitute Sex/Gender Discrimination.

H. Retaliation

Neither Denison nor any other person may intimidate, threaten, coerce, or discriminate against any individual for the purpose of interfering with any right or privilege secured by this Policy, or because the individual has made a report or complaint, testified, assisted, or participated or refused to participate in any manner in an investigation, proceeding, or hearing under the regulations.

Intimidation, threats, coercion, or discrimination, including charges against an individual for code of conduct violations that do not involve sex discrimination or Title IX Sexual Harassment, but arise out of the same facts or circumstances as a report or complaint of sex discrimination, or a report or Formal Complaint of Title IX Sexual Harassment, for the purpose of interfering with any right or privilege secured by Title IX or the regulations, constitutes retaliation. Complaints alleging retaliation against one or more individuals will be resolved as follows:

- For cases involving student Respondents, by the Office of Community Values and Student Conduct pursuant to the [Code of Student Conduct](#);
- For cases involving employee Respondents, under the procedures in the appropriate staff or faculty handbook.

Charging an individual with a Code of Student Conduct or employment policy violation for making a materially false statement in bad faith in the course of a grievance proceeding does not constitute retaliation, as described above, provided, however, that a determination regarding responsibility alone (for example, a finding of insufficient evidence to support a finding of responsibility) is not sufficient to conclude that any party made a materially false statement in bad faith.

III. Reporting Options, Confidentiality, Supportive Measures, and Process Assurances

A. Reporting Options

Denison encourages prompt reporting of harassment and discrimination. To make a report about possible discrimination, sexual harassment or sexual misconduct, a party or any third party should notify the Title IX Coordinator or Deputy Title IX Coordinators.

A report may be made at any time, including during nonbusiness hours, in person, by telephone, by mail, by email, or by completing the online reporting form using the contact information listed for the Title IX Coordinator(s).

Reporting parties have the following options:

- If the reported conduct constitutes a crime, the option to notify Denison Campus Safety and/or local law enforcement (Denison can help facilitate contact with local law enforcement);
- The option to seek medical attention, counseling services, or other confidential resources (see Appendix A for more information);
- The option to file a report with the Title IX Coordinator and request appropriate supportive measures;
- The option to report to another Denison employee, who is required to report the information with the Title IX Coordinator, except where the disclosure is made in the context of a confidential relationship (e.g., counselor-patient, doctor-patient);
- The option to pursue informal resolution or a formal investigation. For allegations of Title IX Sexual Harassment, this requires the submission of a Formal Complaint with the Title IX Coordinator. The process for filing a Formal Complaint is discussed in Section IV.

A Complainant may choose multiple options, and the options they choose may change over time. For example, a Complainant may choose initially to proceed with a criminal investigation, or this process, both, or neither. Regardless of those choices, the Complainant may seek a protection order through a civil protective order proceeding, confidential resources, supportive measures, and/or file a Formal Complaint.

1. Reporting to the University

Denison strongly encourages individuals who have experienced or witnessed Prohibited Conduct to file a report with the Title IX Coordinator. Any person may report Prohibited Conduct in person, by mail, by telephone, or by email, using the contact information listed for the Title IX Coordinator or Deputy Title IX Coordinators, or by any other means that results in the Title IX Coordinator receiving the person's verbal or written report. Such reports may be made at any time, including during non-business hours. Contact information for the Title IX Coordinator is found at the front of this policy. Reports can also be made using the [Title IX Report Form](#) on the Denison website.

Where it is alleged that the Title IX Coordinator has engaged in Prohibited Conduct, such report may be directed to the Provost who will designate an appropriate individual to act as the Title IX Coordinator for purposes of that report. Making a report does not require further action on the part of the reporter.

a) Denison employees' reporting requirements

Denison employees who have not been designated as confidential resources and who become aware of behavior that may constitute Prohibited Conduct must report all information regarding such Prohibited Conduct to the Title IX Coordinator or Deputy Title IX Coordinators as soon as reasonably possible. Some student employees are required to report actual or suspected conduct that could violate this Policy to the Title IX Coordinator or Deputy Title IX Coordinators; these employees include Community Advisors (CAs), orientation program student-staff, and peer mentor/adviser student staff.

2. Reporting to law enforcement

Where an individual has been subjected to violence or other criminal acts, Denison encourages such individuals to seek assistance from medical providers and/or law enforcement immediately after the incident, whether or not the individual intends to pursue criminal charges. This is to assist in the preservation of evidence and to begin a timely response by law enforcement. Preserving evidence may later assist in proving that an alleged criminal offense occurred, or it may be helpful in obtaining a protection order if one is desired.

The Title IX Coordinator can assist in notifying law enforcement authorities if the Complainant chooses.

3. Anonymous reporting

Anonymous reports may be made to Campus Safety by completing the [Anonymous Tips Form](#). Campus Safety will refer this anonymous report to the Title IX Coordinator for further review as appropriate. Denison urges campus community members to report non-anonymously, to enable the most complete review and investigation possible. Depending on the level of information included in an anonymous report, anonymous reporting may limit the University's ability to respond. Employees who are required to make reports under this policy are not permitted to make such reports anonymously. If the anonymous report includes a crime, it will be counted in the University's crime statistics.

4. Making a false or frivolous report

Any student or employee who knowingly or maliciously makes a false or frivolous allegation of Prohibited Conduct will be subject to the University's disciplinary policy and procedures except in cases where a false or frivolous allegation may constitute retaliation under this policy.

5. Requests for the University to take no action

The Title IX Coordinator will take all reasonable steps to respond to, resolve, and remedy a report of Prohibited Conduct consistent with a Complainant's preferences where possible. Where a Complainant makes a report but requests that a name or other identifiable information not be shared with the Respondent or that no formal action be

taken, the University will balance this request with its responsibility to provide a safe and nondiscriminatory environment for all University community members.

In considering a Complainant's request to take no action and evaluating whether to proceed, the Title IX Coordinator will assess and consider:

- the preferences and concerns of the Complainant;
- the nature and circumstances of the allegation;
- the severity and impact of the reported conduct;
- pattern evidence or other similar conduct by Respondent;
- the respective ages of the parties, including whether the Complainant is a minor (under the age of 18);
- whether the Respondent has admitted to the conduct;
- whether the Respondent has been the subject of other complaints or reports of Prohibited Conduct under this policy;
- whether the Respondent threatened further sexual violence or other violence against the Complainant or others;
- whether the report indicates that multiple Respondents were involved;
- whether the report indicates that the conduct was perpetrated with a weapon;
- whether the Respondent is an employee; and,
- whether the University possesses independent means to obtain relevant evidence (e.g., witnesses, security cameras or personnel, or physical evidence).

Where the University is unable to take action consistent with the request of the Complainant, the Title IX Coordinator will inform the Complainant about the chosen course of action and implement necessary supportive measures.

B. Privacy and confidentiality of reports and other information

Privacy and confidentiality have separate and distinct meanings under this Policy:

1. Privacy of information

Denison strives to respect the privacy of the parties and other participants in the Title IX investigation process. Privacy generally means that information related to the report and investigation of Prohibited Conduct will only be shared with a limited selection of individuals whose knowledge is necessary to respond to claims of Prohibited Conduct. Such response includes the reviewing of reports, investigating claims, participating in investigations, conducting hearings, reviewing appeals, providing support to students and employees through supportive measures, and other related issues. All Denison employees involved in this process receive training on safeguarding private information in accordance with all applicable laws. Student education records are protected in compliance with the Family Educational Rights and Privacy Act (FERPA) and other applicable laws in Ohio. Student health records maintained by the University are protected by FERPA. Access to employee personnel records is restricted in accordance with Denison's policies and Ohio law.

Denison will not impose prior restraints on students' and employees' ability to discuss the allegations under investigation, including with a parent, friend, other source of emotional support, with an advocacy organization, or with persons who may have information regarding the underlying incident.

Denison will not disclose the identity of any individual who has made a report or complaint of sex discrimination (including any individual who has made a report or filed a Formal Complaint of sexual harassment), any Complainant, any individual who has been reported to be the perpetrator of sex discrimination, any Respondent, and any witness, except as may be permitted by FERPA, as required by law, or to carry out the purposes of this Policy, including to conduct of any investigation, hearing, or other proceeding.

a) Use of medical or other treatment records

Medical and other counseling records are protected by law. Denison must obtain written consent from a party before Denison may receive any health or other treatment records. If a party provides written consent for medical or other treatment records to become part of an investigation's case file, both parties must be able to review and comment on those records if the investigation moves towards an investigative report and possible hearing.

2. Confidentiality and its limitations

There is a distinction between seeking assistance from a confidential resource and making a report to the University through designated reporting options. Confidential resources, including counselors, medical health providers, clergy, and certified rape crisis counselors, have legally protected confidentiality and will not share information about the person seeking support (including whether or that individual has received services) without the person's consent, except under limited circumstances as permitted or required as described below. Persons seeking confidential resources can contact the Title IX Coordinator or review the Resources Guide at Appendix A for contact information.

Limits to confidentiality required by law that may require the disclosure of information include:

a) Mandatory Reporting of Child Abuse

All Denison employees, including confidential resources under this policy, are mandatory reporters of known or suspected child abuse or neglect and are required to immediately report any knowledge or reasonable suspicion that a minor (someone under 18 years old) is experiencing abuse or neglect based on information shared by the minor, from any other individual including one's own observations or knowledge. Any Denison employee suspecting abuse or neglect is required to bring all suspicions to the immediate attention of the Director of Campus Safety and the Title IX Coordinator. Denison community members who are not employees are strongly encouraged to report any knowledge or reasonable suspicion of child abuse to Campus Safety or to law

enforcement. In addition to notifying the Title IX Coordinator and Director of Campus Safety, Denison employees must make a direct report to the Licking County Job & Family Services. Reports may be made by calling the abuse and neglect hotline at (740) 670-8888 or in person at 74 South Second Street, P.O. Box 5030, Newark, Ohio 43058-5030, weekdays 8 a.m. to 5 p.m. For after hours, weekend, and holiday emergencies, please contact the Licking County Sheriff's Office at (740) 670-5500 and ask for the on-call social worker.

b) Ohio Felony Reporting Requirement

Under Ohio law, all individuals, excluding confidential resources, must report felonies, including sexual violence, to law enforcement. Under Ohio Revised Code Section 2921.22, medical professionals, mental health professionals and clergy are not required to report felonies. This legal requirement means that the Title IX Coordinator or Campus Safety must report any felony to the GPD and/or Licking County Prosecutors Office Sheriff's Department. To the extent reasonably possible, Denison will communicate with the Complainant in advance of any report to law enforcement. The Complainant has the choice whether and how to participate in any subsequent criminal investigation.

c) Ohio Medical Professional Reporting Requirements

In Ohio, medical professionals have distinct legally mandated reporting responsibilities. Where a medical professional knows or has reasonable cause to believe that serious physical harm resulted from an offense of violence, the medical professional is required to make a report to law enforcement. Medical professionals must deem a patient medically stable before reporting and must communicate to the patient that the patient does not have to report and/or speak to the police. If the patient chooses not to speak to police at the time of the medical examination, the medical professional does not need to report the patient's name - only the date, general time, and general location of the incident.

d) Risk of Harm to Self or Others

Mental health professionals are required to disclose information where there is an imminent threat of harm to self (the client) or others.

e) Clergy Act Reporting

Pursuant to the Clergy Act, anonymous statistical information for certain offenses that have been reported at campus locations must be shared with Campus Safety. The information does not include the names or any other identifying information about the persons involved in such offenses.

C. Reporting considerations

1. Timeliness

In order to maximize the University's ability to respond promptly and effectively, all those impacted by Prohibited Conduct are encouraged to report as soon as possible. There is no time limit on reporting violations of this Policy, though prompt reporting by employees is required. If the Respondent is no longer a student or employee at the time of the report, the University may not be able to take disciplinary action against them. The University will still provide support and reasonably available supportive measures to a Complainant, as well as assistance in identifying appropriate external reporting options.

2. Amnesty for personal use of alcohol or other drugs

Students reporting violations of this Policy or who participate in investigations of alleged violations of this Policy will not be subject to disciplinary action by the University for violations of Denison's drug or alcohol possession or consumption policies, provided that such violations did not and do not place the health or safety of any other person at risk. While policy violations cannot be overlooked, in these instances Denison may initiate educational options rather than pursue disciplinary actions.

D. Supportive measures available to parties

Denison offers supportive measures to both Complainants and Respondents. When Denison has actual knowledge a report of Prohibited Conduct in which there is an identifiable Complainant, the Title IX Coordinator will promptly contact the Complainant to discuss the availability of supportive measures, consider the Complainant's wishes with respect to supportive measures, inform the Complainant of the availability of supportive measures with or without the filing of a Formal Complaint, and explain to the Complainant the process for filing a Formal Complaint. Upon noticing a Respondent of a report raising potential sexual harassment violations against the Respondent, the Title IX Coordinator will discuss with the Respondent the availability of counseling and may discuss the availability of other supportive measures discussed above, where the Title IX Coordinator deems appropriate. Throughout any informal resolution, formal process, and/or appeals process, the Title IX Coordinator will continually reassess and discuss appropriate supportive measures with the parties.

1. Description of available supportive measures

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. They are designed to restore or preserve equal access to Denison's education program or activity without unreasonably burdening the other party, including measures designed to protect the safety of all parties or Denison's educational environment, or deter Prohibited Conduct.

Supportive measures at Denison may include, but are not limited to: counseling, extension 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. They can also include:

- Modifying academic and extracurricular activities
- Providing alternative course completion options
- Providing academic support services
- Assisting in obtaining visa or immigration information
- Modifying transportation, parking, dining and working situations
- Implementing access restriction or interim suspension of an individual while a matter is investigated and resolved
- Imposing other protections or restrictions as necessary and appropriate

2. Disclosure and documentation of supportive measures

Denison will maintain as confidential any supportive measures provided to the Complainant or Respondent, to the extent that maintaining such confidentiality would not impair the ability of Denison to provide the supportive measures. The Title IX Coordinator is responsible for coordinating the effective implementation of supportive measures. University employees are expected to keep supportive measures private except as may be necessary to provide the supportive measures.

The Title IX Coordinator is responsible for maintaining records of all supportive measures that are given to each party, information about which measures were requested by a party but not offered and the rationale for such decision, and information about which supportive measures were offered but rejected by a party. If the University does not offer supportive measures to a party, it must document the reasons why such response was reasonable in light of the known circumstances.

As required by the Clery Act, Denison will provide written notification to student and employee Complainants about existing counseling, health, mental health, victim advocacy, legal assistance, visa and immigration assistance, student financial aid, and other services available for Complainants who report being victims of crimes.

E. Emergency removal process

After receiving a report, the University can remove a Respondent on an emergency or temporary basis from educational programs and from University property. The Title IX Coordinator conducts an individualized safety and risk analysis to determine whether there exists an immediate threat to physical health or safety of any student or other individual arising from the allegations of sexual harassment and/or other allegations of Prohibited Conduct. If so, the Title IX Coordinator may, in consultation with the appropriate University personnel, impose interim restricted access or interim suspension of an individual before resolution of a formal complaint of Prohibited Conduct. Interim restricted access or emergency removal are preventative actions and will not be considered disciplinary in nature. The Title IX Coordinator will notify both parties in writing of the resulting restrictions and any changes to such restrictions.

All Respondents are able to challenge an emergency removal imposed under this Policy. If a Respondent wishes to do so, the Respondent must provide written notice of such challenge, including their reasons, to the Title IX Coordinator within two (2) business days of receiving notice of the restriction. The Title IX Coordinator, in conjunction with appropriate University personnel, will meet with the Respondent and an advisor of the Respondent's choice. The purpose of the meeting is to permit the Respondent to respond to the removal. The location of the meeting will be determined by the Title IX Coordinator and may occur via telephone or video conference. Within one (1) business day of the meeting, the Title IX Coordinator and appropriate University personnel will consult regarding the emergency removal and will notify the Respondent in writing of the outcome. Any changes to the removal will be provided in writing to all parties.

F. Administrative leave for non-student employees

The Title IX Coordinator, in conjunction with other appropriate University personnel, may impose an administrative leave on employee Respondents if the facts and circumstances surrounding the reported conduct support such leave. Administrative leave is a separate process from an Emergency Removal and is not disciplinary in nature. Employees placed on administrative leave will receive written notice of the conditions of that leave but will not be able to challenge the administrative leave.

G. Advisors available to parties

Complainants and Respondents will have equal opportunities to bring an advisor of their choice with them to any meetings, proceedings, and informal resolution sessions. An advisor may be, but is not required to be, an attorney. Denison will not limit the choice or presence of an advisor for Complainant or Respondent in any meeting, investigative interview, or grievance proceeding. Advisors are required to abide by University restrictions regarding the extent to which they may participate in proceedings, and any restrictions will apply equally to both parties. If a party's advisor refuses to comply with restrictions set by Denison, Denison may require the party to use a different advisor.

Should a Formal Complaint be filed and proceed to a live hearing as described in Section, each party's advisor will conduct cross-examination on their behalf. If a party does not have an advisor of choice to accompany them to the pre-hearing conference and the Live Hearing, the University will appoint an advisor, free of charge, to perform the cross-examination function for the party. If you have questions about advisors, please contact the Title IX Coordinator.

H. Assurances and expectations for the parties under this policy

In any report, complaint, investigation or resolution under this Policy, both a Complainant and a Respondent can expect:

- a prompt and equitable response to reports of Prohibited Conduct;
- to receive supportive measures that may be reasonably available and necessary for protection and support;

- information about how to access confidential resources on and off campus and other forms of support available through the University and in the community;
- written notice of the investigation into alleged conduct, potential Policy violations at issue, and details about the process;
- for a report, the respondent will receive information about the report to the extent necessary to provide and effectuate supportive measures;
- an adequate, reliable, thorough and impartial process conducted by individuals free from conflict of interest and bias;
- a process that includes the presumption that the Respondent is not responsible for a Policy violation unless and until a determination regarding responsibility is made at the conclusion of the process;
- the opportunity for an advisor of choice who may attend all meetings and proceedings related to the report and/or complaint;
- timely notice of any meeting at which the party's presence is required, with sufficient time to prepare for the meeting;
- agency and autonomy to decline to participate in an investigation or resolution under the Policy, although the University may choose to continue the process even if the Complainant and/or Respondent does not participate;
- to identify witnesses, submit suggested questions in writing during the investigation, and provide evidence during the investigation and resolution;
- timely and equal access to any information that is used in the investigation and resolution;
- prompt remedial action if Prohibited Conduct is determined to have occurred;
- regular communication about the progress of the process and of the resolution;
- timely written notice of the outcome, required remedies, and issued sanctions and rationale;
- the opportunity to appeal the outcome (determination as to responsibility) and sanction;
- to be free from retaliation;
- parties may request interpreters and/or translators which will be selected and provided by the University;
- reasonable accommodation for individuals with disabilities can be requested through established University protocol as provided by the Americans with Disabilities Act and/or Section 504 of the Rehabilitation Act; and,
- to be free from University-imposed orders restricting parties from discussing the case with others.
- This does not prohibit the University from issuing no-contact orders or requiring employees to abide by confidentiality laws.

I. Report resolution

A report to the Title IX Coordinator is not the same as a Formal Complaint. In order for a report of Title IX Sexual Harassment to be officially resolved, a Formal Complaint must be filed in writing alleging sexual harassment or other sexual misconduct against a Respondent and requesting that the school officially investigate and resolve the allegation. The complaint may be resolved through either Alternate Resolution (Section VII) or through the Formal Investigation and Live Hearing Process (Section V).

Where a case is not eligible for a Title IX hearing but involves sexual assault, dating violence, domestic violence, or stalking allegations, the following procedural protections will be available to both parties through the Code of Student Conduct, if the Respondent is a student. For Respondents who are faculty or staff members, the Anti-Harassment Policy procedures will apply as administered by the Human Resources or its designee for preliminary investigation:

- Continued access to informal resolution procedures until a determination is reached as to whether a Policy violation occurred;
- Continued access to supportive measures;
- Procedures are conducted by officials that receive annual training on issues related to dating violence, domestic violence, sexual assault, and stalking and on how to conduct an investigation and hearing process that protects the safety of the victims and promotes accountability;
- Continued ability to bring an advisor of choice to any related meeting or proceeding;
- Both parties receive simultaneous written notice of the result of the disciplinary proceeding, the procedures for appeal, any changes to the result, and when such results become final.

IV. Filing and Investigating a Formal Complaint of Title IX Sexual Harassment

A. Formal Complaints -- how they are filed and withdrawn

A Formal Complaint is a document filed in writing by a Complainant, or signed by the Title IX Coordinator, that alleges Title IX Sexual Harassment against a Respondent and requests that the University officially investigate and resolve the allegation. The Formal Complaint may be filed with the Title IX Coordinator in person, by mail, by electronic mail, by in-person delivery, or through the online [Formal Complaint Form](#) and must contain the Complainant's physical or digital signature.

There are circumstances when a Title IX Coordinator may need to sign a Formal Complaint that obligates the University to initiate an investigation, regardless of the Complainant's relationship with the University or interest in participating in the Title IX grievance process. For example, if the University has actual knowledge of a pattern of alleged sexual harassment by a perpetrator in a position of authority, the Title IX Coordinator may be required by Title IX to sign a Formal Complaint even if the purported Complainant does not wish to file a formal complaint or participate in a grievance process. This is because the University has a Title IX obligation to provide all students, not just the Complainant in a particular case, with an educational environment that does not discriminate based on sex.

In the instances when the Title IX Coordinator signs a Formal Complaint, the Title IX Coordinator is not a Complainant or a party during any resolution and must comply with requirements for any person involved in the response and/or resolution to be free from conflicts and bias.

A Formal Complaint may be withdrawn if the Complainant informs the Title IX Coordinator in writing that they want to withdraw the complaint or the allegations. The Title IX Coordinator may choose to withdraw a Formal Complaint if a Respondent is no longer participating in or attempting to participate in the University's education or program activity, the Complainant submits a written request to withdraw the complaint, or specific circumstances prevent the University from gathering evidence sufficient to reach a determination. No matter the reason for the withdrawal of a complaint, the parties will be notified in writing of the decision, including the reasoning.

B. Initial review by Title IX Coordinator

1. Evaluation of Title IX applicability

Upon first receiving a Formal Complaint, the Title IX Coordinator will conduct an initial review to determine whether the allegations included in the complaint would, if demonstrated by a preponderance of the evidence, constitute Title IX Sexual Harassment. If not, the Title IX Coordinator will dismiss the Formal Complaint and notify both parties in writing of this decision. If a Title IX Formal Complaint is dismissed, it will be referred for further review as follows:

- For cases involving student Respondents and allegations that meet the definitions of non-Title IX sexual harassment, sexual assault, dating violence, domestic violence, or stalking, the Title IX Coordinator will review the matter for possible resolution through the modified Code of Student Conduct procedures described in paragraph 8 of §I;
- For cases involving student Respondents and no allegations that would meet any definitions of sexual harassment, sexual assault, dating violence, domestic violence, or stalking provided in this Policy, the Complaint and other relevant materials will be provided to the Office of Community Values and Student Conduct (OCSC) to be reviewed according to procedures found in the Code of Student Conduct;
- For cases involving employee Respondents, the Complaint and other relevant materials will be provided to the Office of Human Resources to be reviewed according to procedures found in the faculty or staff handbooks.

The parties have three (3) business days from the date of notice of Title IX Dismissal to submit a written appeal to the Title IX Coordinator. For more information, see Section VI.

2. Consolidation of Formal Complaints

The Title IX Coordinator may consolidate Formal Complaints as to allegations of Prohibited Conduct against more than one Respondent, or by more than one Complainant against one or more Respondents, or by one party against the other party, where the allegations of Prohibited Conduct arise out of the same facts or circumstances, i.e., are so intertwined that their allegations directly relate to all parties. Where multiple Complainants or Respondents are involved in the same investigation,

the parties will only be provided with the appropriate portion(s) of the investigative documents that relate to the complaint(s) in which they are a party.

C. Title IX formal investigations

After a Formal Complaint has been filed and has survived review by the Title IX Coordinator, Denison will initiate a formal investigation and notify the parties and their advisors in writing. The notice of investigation will include:

- the identities of the parties involved;
- the specific section/s of the Policy allegedly violated;
- the precise conduct alleged to constitute the potential violation/s;
- the approximate date, time, and location of the alleged incident;
- a statement indicating that the Respondent is presumed not responsible for the alleged conduct;
- a statement that the determination of responsibility will be made at the conclusion of a Formal Resolution;
- a notice that parties have the right to an advisor of their choice;
- the result of an initial assessment to determine whether the allegations suggest a potential violation of Title IX Sexual Harassment with an indication that this decision will be reviewed again when the investigators prepare their report;
- the name of the investigators and the ability to challenge their participation for conflict of interest or actual bias;
- the appropriate Policy language prohibiting a party from knowingly making false statements or knowingly submitting false information; and
- a notice that Retaliation is prohibited.

The notice shall be provided reasonably in advance of any interview with the investigators, with sufficient time for meaningful preparation. The Title IX Coordinator, in consultation with the investigators, may amend the charges as part of the investigative process. The Title IX Coordinator will, if appropriate, issue written notice of amended charges to both parties.

1. Investigator roles and participants' responsibilities

The Title IX Coordinator will designate one or more investigators to conduct an adequate, reliable and impartial investigation. Denison may engage an external investigator. In complex situations, the Title IX Coordinator may engage additional trained investigators to assist in gathering the information that will be considered by the primary investigator. If a party has concerns that the investigator has a conflict of interest or bias, it should notify the Title IX Coordinator in writing immediately of these concerns. The burden of proof and the burden of gathering evidence sufficient to reach a determination regarding responsibility rests on the University and not the parties.

The parties will have an equal opportunity to present witnesses, including expert witnesses, and to submit evidence. The investigator will also gather any available physical evidence, including documents, communications between the parties, and

other electronic records as appropriate and available. The parties may submit questions to be asked of parties and witnesses. The investigator will review submitted questions and, in their discretion, may choose which questions are necessary and appropriate to the investigation and conduct any follow-up, as they deem relevant. All parties and witnesses are expected to provide truthful information. Knowingly providing false or misleading information is a violation of Denison's policies and can subject a student or employee to disciplinary action. Making a good faith report to the University that is not later substantiated does not constitute false or misleading information.

2. Use of treatment records with written permission of the parties

A person's medical, counseling/psychological, and similar treatment records are privileged and confidential documents that a party will not be required to disclose. Where a party provides their written permission to share medical, counseling/psychological, and similar treatment records as part of the investigation, only the portion of the records directly related to the allegations raised in the formal complaint will be included in the case file for review by the other party and for use in the investigative process.

3. Use of Complainant's prior sexual history and prior conduct of the parties

Evidence related to the prior sexual history of the Complainant is generally not relevant to the determination of a Policy violation and will only be considered in very limited circumstances. For example, to prove that someone other than the Respondent committed the alleged conduct, or where the existence of consent is at issue, the sexual history between the parties may be relevant to help understand the manner and nature of communications between the parties and the context of the relationship. However, even in the context of a relationship, consent to one sexual act does not, by itself, constitute consent to another sexual act, and consent on one occasion does not, by itself, constitute consent on a subsequent occasion.

Information regarding other acts by a party will be permitted as relevant where the nature and means of those other acts may affect credibility of the assertions in the current case. It is not required that the party have been found responsible for Policy violations related to those other acts for them to be included in the current case. Any party seeking to introduce information about prior sexual history or other acts of the other party should bring this information to the attention of the investigators at the earliest opportunity.

Any party seeking to introduce information about prior sexual history or other acts by a party should bring this information to the attention of the investigators at the earliest opportunity. While the investigators may explore relevant areas of inquiry, the Title IX Coordinator has the discretion to make the final determination whether evidence of prior sexual history or other misconduct is relevant and should be included in the report.

4. Anticipated timeframe

The University will seek to complete the formal investigation within 60 calendar days, which begins upon the filing of the Formal Complaint and concludes upon submittal for a hearing. This timeframe may be extended for good cause with written notice to the parties of the delay and the reason for the delay. Good cause may be based on delays occasioned by the complexity of the allegations, the number of witnesses involved, the availability of the parties or witnesses, the effect of a concurrent criminal investigation, any intervening school break or vacation, or other circumstances, all of which will likely extend the length of time it takes to complete the investigation. The University will provide regular updates to all parties regarding the progress of the investigation.

5. Parties' review of the evidence

The evidence obtained as part of the investigation that is directly related to the allegations raised in the formal complaint will be made available to the parties and their advisors, including the evidence upon which the University may not rely in reaching a determination regarding responsibility and inculpatory or exculpatory evidence.

The parties will then have ten (10) calendar days to review the evidence. The parties will be offered the opportunity to review the evidence and provide a written response that will be submitted to the investigators prior to the completion of the investigative report.

To safeguard the privacy of all those involved, evidence shared in an electronic format will not be printable, downloadable or electronically shareable by the parties or their advisors. Exceptions may be made in compliance with Section 504 of the Rehabilitation Act of 1973.

6. Investigative report completion

Once the parties have reviewed the evidence and have submitted responses, or the time period to submit such responses has passed, the investigators will complete any follow up investigation or assessment they deem necessary and write the investigative report. The investigators will consider whether the conduct alleged, if demonstrated by a preponderance of the evidence, would constitute Title IX Sexual Harassment, in light of the evidence gathered during the investigation. If the investigators find that Title IX Sexual Harassment is properly alleged, the investigators will further determine whether those allegations meet all three of the following jurisdictional requirements such that it is eligible for a Hearing Process:

- The Formal Complaint was filed while the Complainant was participating in or attempting to participate in the education program or activity of the University;
- The reported Title IX Sexual Harassment occurred against a person in the United States; and
- The reported Title IX Sexual Harassment occurred in the University's education program or activity.

The investigators will then make a recommendation to the Title IX Coordinator regarding whether the conduct outlined in the investigative report meets the requirements above.

The Title IX Coordinator will review the recommendation of the investigators and make the final assessment as to whether the conduct alleged, if demonstrated by a preponderance of the evidence, would constitute Title IX Sexual Harassment.

The investigative report will include, but is not limited to, the following sections:

- overview of the complaint made and summary of the investigative methodology;
- summary of relevant information gathered, including:
 - timeline of incident being investigated;
 - Complainant's account of events;
 - Respondent's account of events;
 - witness accounts;
 - evidence gathered;
- areas of agreement;
- areas of disagreement;
- assessment of whether or not the complaint meets one or more of the required elements of the definition of sexual harassment under Title IX, including rationale; and
- an appendix containing all of the collected evidence.

The investigative report will not include:

- Information about the Complainant's sexual predisposition or prior sexual behavior, unless:
 - The information is to prove that someone other than the Respondent committed the alleged conduct; or
 - The information concerns specific incidents of the Complainant's prior sexual behavior with respect to the Respondent and are offered to prove consent
- Information that is protected by a legally recognized privilege; and
- A party's medical, counseling/psychological, and similar treatment records unless the party has given voluntary, written consent.

7. Final assessment by the Title IX Coordinator

The Title IX Coordinator will conduct a final assessment of the case to determine whether it meets the definition of Title IX Sexual Harassment and will notify the parties, in writing, of the assessment and whether or not the complaint will proceed to a hearing or be subject to Title IX Dismissal. If the case is dismissed, it will be adjudicated as follows:

- For cases involving student Respondents and allegations that meet the definitions of non-Title IX sexual harassment, sexual assault, dating violence, domestic violence, or stalking, the Title IX Coordinator will review the matter for possible resolution through the modified Code of Student Conduct procedures described in paragraph 8 of §I;

- For cases involving student Respondents and no allegations that would meet any definitions of sexual harassment, sexual assault, dating violence, domestic violence, or stalking provided in this Policy, the investigative report and other materials will be provided to the Office of Community Values and Student Conduct (OCVSC) to be reviewed and, if appropriate, adjudicated according to procedures found in the Code of Student Conduct;
- For cases involving employee Respondents, the investigative report and other materials will be provided to the Office of Human Resources to be adjudicated according to procedures found in the faculty, administrator, or staff manuals;

Where a case is not eligible for hearing but involves sexual assault, dating violence, domestic violence, or stalking allegations, the following procedural protections will be available to both parties through the Code of Student Conduct and faculty or employee manuals:

- Continued access to informal resolution procedures until a determination is reached as to whether a Policy violation occurred;
- Continued access to supportive measures;
- Procedures are conducted by officials that receive annual training on issues related to dating violence, domestic violence, sexual assault, and stalking and on how to conduct an investigation and hearing process that protects the safety of the victims and promotes accountability;
- Continued ability to bring an advisor of choice to any related meeting or proceeding;
- Both parties receive simultaneous written notice of the result of the disciplinary proceeding, the procedures for appeal, any changes to the result, and when such results become final.

Cases that do not proceed to a live hearing will be resolved through the processes identified above. Such process is typically completed within thirty (30) calendar days of referral for decision, except where extensions are appropriate for good cause as determined by the Title IX Coordinator with written notice to both parties of the reason for the extension.

In a case with multiple charges, if any of the charges constitute Title IX Sexual Harassment, all the charges in that case will typically be handled at the same time through the Hearing Resolution Process (Section V), unless in the Title IX Coordinator's discretion it is appropriate to handle non-Title IX charges in a different manner.

a) Appeal of the final assessment

Parties have three (3) business days after receipt of the investigative report to submit in writing an appeal of the final assessment and Title IX dismissal.

b) Parties' response to the investigative report

When no appeal of the final assessment and Title IX Dismissal decision is filed, the parties have ten (10) days beginning at the conclusion of the three-day appeal window to submit their written response to the investigative report. The response may include an assertion that evidence not summarized in the report, but present in the case file, should be considered as relevant. Written responses should be provided to the Title IX Coordinator, who will share them with the decision-maker prior to the hearing.

V. Hearing Resolution Process for Title IX Sexual Harassment

A Hearing Resolution Process will be used to resolve cases that include charges of Title IX Sexual Harassment. If such cases also include other charges, all the charges in that case will be handled at the same time through the Hearing Resolution Process. The Hearing Resolution Process includes a pre-hearing conference, a live hearing, decisions about responsibility and sanctioning by a decision-maker, and an available appeal process.

At the conclusion of the investigation, but prior to pre-hearing conferences, the Title IX Coordinator will appoint an individual or panel to serve as decision-maker. The decision-maker may be a single hearing officer or a hearing panel. The decision-maker(s) will oversee the hearing process, permit relevant questioning of the parties and witnesses, and issue a written determination regarding responsibility in accordance with these procedures. The University maintains the right to use an external hearing officer or hearing panel to serve as decision-maker(s).

A. Pre-hearing conferences

Each party will have their own pre-hearing conference. The Title IX Coordinator will communicate to the parties, their advisors, and the decision-maker, the date, time, and format for their pre-hearing conference. The Title IX Coordinator, the decision-maker, and the advisor must be in attendance. If the case will be heard by a hearing panel, the Chair of the Hearing Panel will serve as the decision-maker at the pre-hearing conferences. While the parties are strongly encouraged to attend, they are not required to do so.

During the pre-hearing conference, the advisors must share with the decision-maker their list of witnesses to appear at the hearing, the identity of any requested witnesses that were not questioned during the investigation, the request for any new evidence to be considered that was not submitted previously to the investigators, and the availability of the advisor and the party for hearing dates.

Evidence and witnesses may only be presented at the hearing if they were submitted to the investigator(s) and made available to the parties for review, unless they were unavailable at the time of the investigation or the relevance was unknown until the investigative report was submitted. The decision-maker will address any requests to present new evidence and new witnesses at the pre-hearing conference.

The advisor is strongly encouraged to discuss lines of questioning with the decision-maker at the pre-hearing conference to obtain guidance from the decision-maker on

relevancy prior to the hearing. The decision-maker will discuss the expectations and guidelines for appropriate behavior and decorum during the hearing

After reviewing each party's witness list, the decision-maker may, at their discretion, add names of other witnesses contained in the report for the purpose of appearing at the hearing and submitting to cross-examination.

After the conclusion of the pre-hearing conferences, the Title IX Coordinator will provide each party and their advisor with written notice of the date, time, and manner for the hearing, which will typically occur no less than ten (10) business days after the date the investigative report was shared with the parties.

B. Live hearings for Title IX Sexual Harassment cases

The Title IX Regulations require the University conduct a live hearing to address Title IX Sexual Harassment. This hearing may be conducted with all parties physically present in the same geographic location or, at the University's discretion, any or all parties, witnesses, and other participants may appear at the live hearing virtually. Regardless of format, the hearing will be recorded, and the recording will be Denison's property and will be made available to the parties for review and inspection upon their request during the pendency of the process.

Those persons present during the entirety or at designated portions of the hearing include: Complainant, Complainant's advisor; Respondent, Respondent's advisor; decision-maker(s); Title IX Coordinator; witnesses; other appropriate individuals at the discretion of the Title IX Coordinator (for example, an interpreter).

The decision-maker will provide an introduction detailing the purpose of the hearing, have those present identify themselves and their role, remind all parties of the expectation to be candid and honest in their response, and provide a brief overview of the procedure and the anticipated order of the hearing.

The advisors will be responsible for orally asking relevant questions, including those questions which challenge credibility, to the other party or parties and any witnesses directly, in real-time and in a manner that, in the decision-maker's sole discretion, is not inappropriate, harassing, intimidating, irrelevant, or redundant. If the case will be heard by a hearing panel, the Chair of the Hearing Panel will serve as the decision-maker for purposes of deciding whether questions are relevant, appropriate, harassing, intimidating, and/or redundant.

Cross-examination will never be conducted by a party personally. Only relevant questions may be asked of a party or witness. Relevant questions are those tending to prove or disprove a fact at issue.

Questions that are not relevant include:

- Repetition of the same question;

- Questions related to information about the Complainant's sexual predisposition or prior sexual behavior, unless:
 - The information is to prove that someone other than the Respondent committed the alleged conduct; or
 - The information concerns specific incidents of the Complainant's prior sexual behavior with respect to the Respondent and are offered to prove consent;
- Questions related to information that is protected by a legally recognized privilege; and
- Questions related to a party's medical, counseling/psychological, and similar treatment records unless the party has given voluntary, written consent.

The decision-maker will objectively evaluate all evidence to determine its relevance, materiality, weight and reliability.

Before a Complainant, Respondent, or witness answers a question by an advisor, the decision-maker will first determine whether the question is relevant and briefly explain any decision to exclude a question as not relevant, or request rephrasing of the question. The decision-maker is not required to give a lengthy or complicated explanation of a relevancy determination during the hearing. The Decision-maker may later send to the parties any revisions to the explanation of relevance that was provided during the hearing. If the case will be heard by a hearing panel, the Chair of the Hearing Panel will serve as the decision-maker for purposes of deciding whether questions are relevant.

If a party or witness does not submit to cross-examination at the live hearing, the decision-maker will weigh any relevant statements of the party or witness appropriately in reaching a determination of responsibility.

The decision-maker cannot draw an inference about the determination regarding responsibility based solely on a party's or witness's absence from the live hearing or refusal to answer cross-examination or other questions.

C. Written determination on responsibility

After the hearing, the decision-maker will issue a written determination on responsibility. The determination of responsibility will include:

- Identification of the allegations potentially constituting sexual harassment
- A description of the procedural steps taken from the receipt of the Formal Complaint through the determination, including any notifications to the parties, interviews with parties and witnesses, site visits, methods used to gather other evidence, and hearings held;
- Findings of fact supporting the determination;
- Conclusions regarding the application of the Policy to the facts;
- A statement of, and rationale for, the result as to each allegation, including a determination regarding responsibility, any disciplinary sanctions Denison

imposes on the Respondent, and whether remedies will be provided by Denison to the Complainant, and;

- Denison's procedures and permissible bases for the Complainant and Respondent to appeal.

The determination will lay out the evidentiary basis for conclusions reached in the case. The determination will be provided to the parties simultaneously. The determination becomes final only after the time period for appeal has expired or, if a party does file an appeal, after the appeal decision has been sent to the parties.

D. Available remedies and sanctions for violations of the policy

Where a determination of responsibility for Title IX Sexual Harassment, and other included conduct, is made, Denison will provide remedies to a Complainant designed to restore or preserve equal access to Denison's education program or activity. Such remedies may include the same individualized services provided as supportive measures; however, remedies need not be non-disciplinary or non-punitive and need not avoid burdening the Respondent. The Title IX Coordinator is responsible for effective implementation of remedies. Where the final determination has indicated that remedies will be provided, the Complainant can then communicate separately with the Title IX Coordinator or their designee to discuss what remedies are appropriately designed to preserve or restore the Complainant's equal access to education. Remedies for a Complainant which do not affect the Respondent must not be disclosed to the Respondent.

The University recognizes that not every case of Prohibited Conduct is alike in severity. Therefore, the University reserves the right to consider a range of reasonable educational outcomes and sanctions. This range includes a formal warning, receiving a reprimand in the course of employment, mandatory training or other educational interventions, loss of privileges, disciplinary probation, removal from a course, restitution, facility suspension/expulsion, a ban from University property, revocation or deferral of admission and or degree, deferred suspension, disciplinary suspension, disciplinary expulsion, and/or termination of employment.

In determining the sanctions, the following factors will be considered, to the extent the information is available in the case file: (1) the Respondent's prior conduct history; (2) how the University has sanctioned similar incidents in the past; (3) the nature and violence of the conduct at issue; (4) the impact of the conduct on the Complainant; (5) the impact of the conduct on the community, its members, or its property; (6) whether the Respondent has accepted responsibility for their actions; (7) any other mitigating or aggravating circumstances, including the University's values.

The imposition of sanctions will typically take effect immediately but may be stayed at the discretion of the decision-maker in consultation with the Title IX Coordinator. A Respondent who withdraws or separates from the University under any circumstance is not eligible for re-admission or re-employment until they have successfully completed

the terms of any sanctions imposed and met any other reinstatement requirements. In all such circumstances, reinstatement is not guaranteed.

VI. Appeals

Complainants and Respondents may appeal the decision-maker's determination regarding responsibility, or Denison's dismissal of a Formal Complaint or any allegations therein to the Title IX Coordinator who will initiate the appeal process. Denison will notify the other party in writing when an appeal is filed and implement appeal procedures equally for both parties. Both parties will have a reasonable, equal opportunity to submit a written statement in support of, or challenging, the outcome.

The Appeal Officer, who is the decision-maker for the appeal, will issue a written decision describing the result of the appeal and the rationale for the result and provide the written decision simultaneously to both parties.

A Complainant or Respondent must submit a written appeal to the Title IX Coordinator and within three (3) business days of receipt of the written determination on responsibility or within three (3) business days of receipt of the Title IX Coordinator's written notice of Title IX Dismissal. The written appeal must include the specific basis for the appeal and any information or argument in support of the appeal. Upon receipt of the appeal, the Title IX Coordinator will provide the other party notice of the appeal and the opportunity to respond in writing to the appeal. Any response to the appeal must be submitted to the Title IX Coordinator within three (3) business days from the other party's receipt of the appeal. Appeal responses are shared with the other parties, but no further reply is permitted.

Grounds for appeal include:

- Procedural irregularity that affected the outcome of the matter;
- New evidence that was not reasonably available at the time the determination regarding responsibility or dismissal was made, that could affect the outcome of the matter;
- The Title IX Coordinator, investigator(s), or decision-maker(s) had a conflict of interest or bias for or against Complainants or Respondents generally or the individual Complainant or Respondent that affected the outcome of the matter; and
- The Title IX Dismissal or the decision-maker's decision was clearly erroneous based on the evidentiary record.

All grounds for appeal will be available to all parties.

The Appeal Officer for all cases is determined by the classification of the Respondent:

- For students, the Appeal Officer will be the Associate Vice President/Dean of Student Life or designee.
- For faculty, the Appeal Officer will be the Senior Associate Provost for Academic Affairs or designee.

- For staff, the Appeal Officer will be the Associate Vice President for People and Culture or designee.

When the Appeal Officer is unable to serve, or is not otherwise designated in this Policy, the Title IX Coordinator will select a trained individual to be the Appeal Officer with notice to the parties.

The Appeal Officer must be a neutral and impartial decision maker. The parties will be informed, in writing, of the specific Appeal Officer. Within one (1) calendar day of receiving the notice of the designated Appeal Officer, the Complainant and the Respondent may submit a written request to the Title IX Coordinator to replace the named Appeal Officer if there are reasonable articulable grounds to establish bias, conflict of interest or an inability to be fair and impartial.

The designated Appeal Officer will only be replaced if the Title IX Coordinator determines their bias precludes impartiality or constitutes conflict. Additionally, an Appeal Officer who has reason to believe they cannot make an objective determination must recuse themselves from the process.

The Appeal Officer will make a decision regarding the written appeal and, within ten (10) business days of receipt of all appeal documents, notify the Complainant and the Respondent of the outcome. The Appeal Officer may affirm the finding(s); alter the finding(s); alter the sanctions; or request that additional steps be taken.

Appeal decisions are final. All appeal deadlines may be extended for good cause by the Title IX Coordinator. Any extension will be communicated to the parties.

VII. Alternate Resolution Process

An alternate resolution process permits the parties to seek resolution of reports of Prohibited Conduct and Formal Complaints of Title IX Sexual Harassment. Denison does not require as a condition of enrollment or continuing enrollment, or employment or continuing employment, or enjoyment of any other right, the waiver of the right to an investigation and adjudication of Prohibited Conduct under Denison's grievance process. Similarly, Denison will never require the parties in a sexual harassment allegation to participate in an alternate resolution process, as described below.

After the filing of a Formal Complaint of Title IX Sexual Harassment or a report of other Prohibited Conduct, and if all parties voluntarily consent in writing, Denison will assist the parties in an alternate resolution process. An alternate resolution process is available at any time prior to reaching a determination regarding responsibility in the grievance process, except in the cases of reports of Title IX Sexual Harassment of a student by a Denison employee.

Before initiating an alternate resolution, Denison will: (1) provide the parties a written notice; and (2) obtain the parties' voluntary, written consent to the alternate resolution process. The written notice that Denison will provide to the parties will disclose the allegations, the requirements of the informal resolution process, and any consequences

resulting from participating in the alternate resolution process, including the records that will be maintained or could be shared.

Denison's alternate resolution enables that, at any time prior to agreeing to a resolution, any party has a right to withdraw from the informal resolution process and resume the grievance process with respect to the report or Formal Complaint. Statements made during the alternate resolution process are normally limited to the purposes of that process and may not be used in any subsequent or Formal Resolution process.

An alternate resolution process is available at any time prior to reaching a determination regarding responsibility in the grievance process, except in the cases of reports of sexual harassment of a student by a Denison employee.

Forms of alternate resolution include, but are not limited to educational intervention, informal resolution, and restorative justice. A full description of available forms of alternative resolution is available by contacting OCCR for student services and the Office of the Provost and the Office of Human Resources for employee and faculty information on alternative resolution.

Matters that are resolved informally under this process are not released as part of a student's University disciplinary record but will be maintained by the University for a period of seven years in accordance with Section VIII of this Policy. The matter may also be considered internally (e.g., to inform assessments of repeated conduct or future policy violations).

VIII. Record Keeping

Denison will retain all records of each investigation instituted under this Policy for seven (7) years. Records will include all documents, recordings, or transcripts from investigations, hearings, appeals, and informal resolutions. The first date of the first record created by Denison will begin the seven-year retention period. Records will be maintained for all investigations including investigations that have been dismissed, completed, or otherwise resolved.

Denison will also maintain and publish on Denison's website training materials of employees who serve as Title IX Coordinators, investigators, decision-makers, and persons who facilitate information resolutions.

Complainants and Respondents, and/or anyone acting on their behalf may not record interviews or any other proceeding during an investigation or resolution process. Individuals found to have violated this recording prohibition may face disciplinary action up to and including expulsion or termination.

IX. Educational Programs

A. Educational programing required for the University community

All incoming students and new employees will receive training on the prevention of dating violence, domestic violence, sexual assault, and stalking. Training will include:

- Information on Denison’s prohibition on dating violence, domestic violence, sexual assault, and stalking, and the definitions of each;
- The definition of consent;
- A description of safe and positive options for bystander intervention;
- Information on risk reduction, and;
- Information on Denison’s criminal and University-based investigation process.

In addition, Denison will conduct ongoing prevention and awareness campaigns for students and employees, including programming, initiatives, and strategies that are sustained over time and focus on increasing understanding of topics relevant to and skills for addressing dating violence, domestic violence, sexual assault, and stalking, using a range of strategies with audiences throughout the institution and including information described in this section.

B. Training required of those instituting this Policy

The Title IX Coordinator, investigators, decision-makers, and any person who facilitates an informal resolution process, will receive training on the definition of sexual harassment, the scope of Denison’s education program or activity, how to conduct an investigation and grievance process including hearings, appeals, and informal resolution processes, and how to serve impartially, including by avoiding prejudgment of the facts at issue, conflicts of interest, and bias. This includes how to apply the definitions with respect to consent (or the absence or negation of consent) consistently, impartially, and in accordance with this Policy.

Investigators will receive training on issues of relevance to create an investigative report that fairly summarizes relevant evidence.

Decision-makers will receive training on any technology to be used at a live hearing and on issues of relevance of questions and evidence, including when questions and evidence about the Complainant’s sexual predisposition or prior sexual behavior are not relevant.

Any materials used to train Title IX Coordinators, investigators, decision-makers, and any person who facilitates an informal resolution process, must not rely on sex stereotypes and must promote impartial investigations and adjudications of Formal Complaints of sexual harassment.

Training under this section is required on an as-needed basis. Training materials for training under this section will be made publicly available through Denison’s website. Published training materials will be up-to-date and reflect the latest training provided.

The Title IX Coordinator, investigators, decision-makers, and any person who facilitates an informal resolution process, will receive annual training on issues related to dating violence, domestic violence, sexual assault, and stalking and on how to conduct an

investigation and hearing process that protects the safety of victims and promotes accountability.

Appendix A: On-campus and Off-campus Resources

Who can I talk to?

Sexual violence can be a traumatic experience for anyone. We encourage you to speak with someone. Below are some resources

Confidential Resources: Offices, people, and organizations available on campus who are trained to support but are not required to report to the University or law enforcement (unless the person reporting is in danger of harming self or others).

- Hoaglin Wellness Center Counseling Staff: (740) 587-6200
- Hoaglin Wellness Center Medical Staff: (740) 587-6200
- Clergy – Center for Spiritual Life: (740) 587-8583

Non-Confidential resources: A trusted University faculty member, staff member, and coach, as well as student Community Assistant (CA) and Community Coordinator (CC) can be a good resource to speak with. However, per Title IX regulations and this Policy, these employees are required to report all instances of sexual assault and other sexual misconduct, intimate partner violence or stalking. However, in most cases, it is up to the reporting person if the University will pursue the report. For more information, please see the “[Reporting Options](#)” section of Denison’s Title IX website.

University provided support and protections: The University can provide protections, like no contact orders, and accommodations in academics, housing, dining, etc. For more information, visit the “[Support Options](#)” section of the Denison Title IX website.

Community Resources: There are several organizations in the surrounding communities who can help

- [Family Health Services of East Central Ohio](#) – (800) 688-3266 (24-hour hotline), (740) 344-9291
100 McMillen Drive, Newark, OH 43055
- [The Woodlands, Center for New Beginnings Shelter](#) (Domestic Violence) – (800) 686-2760 (24-hour hotline), (740) 349-7066
195 Union Street, Suite B-1, Newark, OH 43055
- [Buckeye Region Anti-Violence Organization](#) (BRAVO) – (614) 294-7867 or (866) 862-7286
- [Lutheran Social Services CHOICES Columbus](#) (Domestic Violence Services) – (614) 224-4663 (24-hour hotline)
- [Rape, Abuse & Incest National Network](#) (RAINN) – (800) 656-4673