



Equal Opportunity, Harassment and Non-Discrimination

Approved by Campus Council: April 29, 2014

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Equal Opportunity, Harassment and Nondiscrimination

The College of Wooster affirms its commitment to promote the goals of fairness and equity in all aspects of the educational enterprise. This commitment extends to all rights, privileges, programs and activities, including housing, employment, admissions, financial assistance, and educational and athletic programs at the College. The policies herein are applicable regardless of the status of the parties involved, who may be members or non-members of the campus community, students, student organizations, faculty, administrators and/or staff. The College of Wooster reserves the right to act on incidents occurring on-campus or off-campus, when the off-campus conduct could have an on-campus impact or impact on the educational mission of The College of Wooster.

The Secretary of the College serves as the Title IX Coordinator and ADA/504 Coordinator and oversees implementation of the College's disability compliance and the College's policy on equal opportunity, harassment, and nondiscrimination. Reports of discrimination, harassment, and/or retaliation should be made promptly to the Secretary of the College (as the Title IX Coordinator) or a Deputy Title IX Coordinator, but there is no time limitation on the filing of complaints, as long as the accused individual remains subject to the College's jurisdiction. Reporting is addressed more specifically on pages 12-13.

This policy applies to incidents involving one or more members of The College of Wooster community that take place on the campus or at college-sponsored events and may also apply to off-campus behaviors and to actions online when the Title IX Coordinator determines that the off-campus conduct affects a substantial College of Wooster interest. A substantial College of Wooster interest is defined to include:

- a. Any action that constitutes a criminal offense as defined by federal or Ohio law. This includes, but is not limited to, single or repeat violations of any local, state, or federal law;
- b. Any situation where it appears that the accused individual may present a danger or threat to the health or safety of self or others;
- c. Any situation that significantly impinges upon the rights, property, or achievements of self or others or significantly breaches the peace and/or causes social disorder;
- d. Any online postings or other electronic communication by students, faculty, or staff, including cyber-bullying, cyber-stalking, cyber-harassment, etc. whether or not outside of The College of Wooster's control (e.g. not on a college network, website or between College of Wooster email accounts) when those online behaviors can be shown to cause a substantial on-campus disruption;
- e. Any other situation that is detrimental to the educational interests of The College of Wooster; and/or
- f. Off-campus discriminatory or harassing speech by employees when such speech is made in an employee's official or work-related capacity or under any of the circumstances listed above.

The College of Wooster reserves the right to impose any level of sanction for violation of any of these policies herein, ranging from reprimand up to and including suspension or expulsion for students and termination for employees.

Inquiries about this policy may be made internally to:

Angela Johnston Title
IX Coordinator
Chief of Staff and Secretary of the College
Office of the President
223 Galpin Hall
330-263-2141
ajohnston@wooster.edu

Inquiries may be made externally to:

Ohio Civil Rights Commission
161 S. High St., #205
Akron, OH 44308
Telephone: (330) 643-3100 Web:
<http://www.crc.ohio.gov/>

Equal Employment Opportunity Commission (EEOC)
Contact: <http://www.eeoc.gov/contact/>

Office for Civil Rights (OCR)
U.S. Department of Education 400
Maryland Avenue, SW
Washington, DC 20202-1100
Customer Service Hotline: (800) 421-3481
Facsimile: (202) 453-6012
TDD#: (877) 521-2172
Email: OCR@ed.gov
Web: <http://www.ed.gov/ocr>

1. The College of Wooster Policy on Nondiscrimination

The College of Wooster adheres to all federal and state civil rights laws banning discrimination in private institutions of higher education. The College of Wooster will not discriminate against any employee, applicant for employment, student or applicant for admission on the basis of race, color, sex/gender, gender identity, gender expression, pregnancy, political affiliation, religion, creed, ethnicity, national origin (including ancestry), citizenship status, physical or mental disability of a qualified individual, age, marital status, family responsibilities, sexual orientation, veteran or military status (including special disabled veteran, Vietnam-era veteran, or recently separated veteran), predisposing genetic characteristics, domestic violence victim status, or any other protected category under applicable local, state, or federal law, including protections for those opposing discrimination or participating in any complaint process on campus or within the Equal Employment Opportunity Commission or other human rights agencies.

The College of Wooster will not request or require the disclosure of genetic information except as may be permitted under the Genetic Information Nondisclosure Act. This non-discrimination policy applies to all personnel actions, including, but not limited to, recruitment, selection, placement, training, advancement, transfers, demotions, or layoffs, and all matters involving compensation. The College prohibits discrimination which denies full and equal employment of, and opportunity to participate in and benefit from, the goods, services, facilities, privileges, advantages, and accommodations offered by the College, including, but not limited to, educational opportunities and access to facilities and other services by otherwise qualified individuals. The College will provide reasonable accommodations to qualified individuals with disabilities.

This policy covers nondiscrimination in employment and in access to educational opportunities. Therefore, any member of the campus community, guest, or visitor who acts to deny, deprive, or limit the educational, employment, residential, and/or social access, benefits, and/or opportunities of any member of the campus community on the basis of their actual or perceived membership in the protected classes listed above is in violation of The College of Wooster's policy on nondiscrimination. When brought to the attention of the College, any such discrimination will be appropriately remedied by the College.

2. The College of Wooster Policy on Accommodation of Disabilities

The College of Wooster is committed to full compliance with the Americans With Disabilities Act of 1990 (ADA) and Section 504 of the Rehabilitation Act of 1973, which prohibit discrimination against qualified persons with disabilities, as well as other federal and state laws pertaining to individuals with disabilities. Under the ADA and its amendments, a person has a disability if he or she has a physical or mental impairment that substantially limits a major life activity. The ADA also protects individuals who have a record of a substantially limiting impairment or who are regarded as disabled by the institution whether qualified or not. A substantial impairment is one that significantly limits or restricts a major life activity such as hearing, seeing, speaking, breathing, performing manual tasks, walking, or caring for oneself.

The Secretary of the College has been designated as the ADA/504 Coordinator responsible for coordinating efforts to comply with these disability laws, including investigation of any complaint alleging noncompliance.

a. Students with Disabilities

The College of Wooster is committed to providing qualified students with disabilities with

reasonable accommodations and support needed to ensure equal access to the academic programs and all activities and services of The College of Wooster.

All accommodations are made on a case-by-case basis. Students requesting academic accommodations should contact the Director of the Learning Center; all other requests for accommodations should be directed to the Longbrake Student Wellness Center. Requests, and supporting documentation provided by the student, will be reviewed and, in consultation with the student, appropriate accommodations to the student's particular needs and academic programs will be determined.

b. Applicants with Disabilities

Applicants are not required to indicate on the application for admission whether they have a disability. Applicants who wish to have their disability considered as a factor in the admissions process, however, must disclose the disability at the time of application and provide an explanation of why it is a factor in evaluating the applicant's qualifications for admission. If the applicant wishes the disability to be considered as a factor, it may be necessary for the applicant to provide appropriate documentation of the disability.

c. Employees with Disabilities

Pursuant to the ADA, The College of Wooster will provide reasonable accommodation(s) to all qualified applicants, and to all qualified employees with known disabilities, where their disability affects the performance of their essential job functions, except where doing so would be unduly disruptive or would result in undue hardship.

An applicant or employee with a disability is responsible for requesting an accommodation in writing to the Associate Vice President of Human Resources (AVP for HR) and providing appropriate documentation. The AVP for HR or his/her designee will work with the applicant to identify reasonable accommodations to facilitate the application process, and with an employee's supervisor to identify which essential functions of the position are affected by the employee's disability and what reasonable accommodations could enable the employee to perform those duties.

3. The College of Wooster Policy on Discriminatory Harassment

Students, staff, administrators, and faculty are entitled to a working environment and educational environment free of discriminatory harassment. The College of Wooster's harassment policy is not meant to inhibit or prohibit educational content or discussions inside or outside of the classroom that include germane, but controversial or sensitive subject matters protected by academic freedom. The sections below describe the specific forms of legally prohibited harassment that are also prohibited under The College of Wooster's policy.

a. Discriminatory and Bias-Related Harassment

Harassment constitutes a form of discrimination that is prohibited by law. The College of Wooster will remedy all forms of harassment when reported, whether or not the harassment rises to the level of creating a hostile environment. When harassment rises to the level of creating a hostile environment, The College of Wooster may also impose sanctions on the harasser. The College of Wooster's harassment policy explicitly prohibits any form of harassment, defined as unwelcome conduct on the basis of actual or perceived membership in a protected class, by any member or group of the community.

A hostile environment may be created by oral, written, graphic, or physical conduct that is sufficiently severe, persistent, pervasive, or objectively offensive so as to interfere with, limit, or deny the ability of an individual to participate in or benefit from educational programs or activities or employment access, benefits, or opportunities.¹

Offensive conduct and/or harassment that does not rise to the level of discrimination or that is of a generic nature not on the basis of a protected status may not result in the imposition of discipline under College policy, but will be addressed through civil confrontation, remedial actions, education, and/or effective conflict resolution mechanisms. For assistance with conflict resolution techniques, employees should contact the AVP of HR, and students should contact the Dean of Students.

The College of Wooster condemns and will not tolerate discriminatory harassment against any employee, student, visitor, or guest on the basis of any status protected by College policy or law.

b. Sexual Harassment

Both the Equal Employment Opportunity Commission and the State of Ohio regard sexual harassment as a form of sex/gender discrimination and, therefore, as an unlawful discriminatory practice. The College of Wooster has adopted the following version of the EEOC definition of sexual harassment, in order to address the special environment of an academic community, which consists not only of employer and employees, but of students as well.

Unwelcome sexual advances, requests for sexual favors, and other verbal, visual, or physical conduct of a sexual/gendered nature when (1) submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment or academic status, (2) submission to or rejection of such conduct by an individual is used as the basis of employment or academic decision affecting such individual, or (3) such conduct is sufficiently severe, pervasive or persistent that it has the effect of unreasonably interfering with an individual's work or academic performance by creating an intimidating, hostile, or offensive working, educational, residential, and/or social environment.²

¹ This definition of hostile environment is based on Federal Register / Vol. 59, No. 47 / Thursday, March 10, 1994: Department Of Education Office For Civil Rights, Racial Incidents And Harassment Against Students At Educational Institutions Investigative Guidance. The document is available at <http://www.ed.gov/about/offices/list/ocr/docs/race394.html>.

² The Ohio Revised Code (ORC) defines sexual conduct as, "vaginal intercourse between a male and a female; anal intercourse, fellatio, and cunnilingus between persons regardless of sex; and, without privilege to do so, the insertion, however slight, of any part of the body or any instrument, apparatus, or other object into the vaginal or anal opening of another." This definition is applicable to criminal prosecutions for sexual conduct (including rape, sexual battery, and unlawful sexual conduct with a minor) in Ohio, but may differ from the definition used by The College of Wooster to address policy violations.

Some examples of possible sexual harassment include:

- A professor insists that a student have sex with him/her in exchange for a good grade. This is harassment regardless of whether the student accedes to the request.
- A student repeatedly sends sexually oriented jokes around on an email list s/he created, even when asked to stop, causing one recipient to avoid the sender on campus and in the residence hall in which they both live.
- Explicit sexual pictures are displayed in a professor's office or on the exterior of a residence hall door.
- Two supervisors frequently 'rate' several employees' bodies and sex appeal, commenting suggestively about their clothing and appearance.
- A professor engages students in her class in discussions about their past sexual experiences, yet the conversation is not in any way germane to the subject matter of the class. She probes for explicit details, and demands that students answer her, though they are clearly uncomfortable and hesitant.
- An ex-girlfriend widely spreads false stories about her sex life with her former boyfriend to the clear discomfort of the boyfriend, turning him into a social pariah on campus.
- Male students take to calling a particular female student the first name of a notorious celebrity because of her resemblance to that celebrity. Soon, everyone adopts this nickname for her, and she is the target of relentless remarks linked to antics and examples of the celebrity's notoriety.
- A student grabbed another student by the hair, then grabbed her breast and put his mouth on it. While this is sexual harassment, it is also a form of sexual violence.

c. Consensual Relationships

There are inherent risks in any romantic or sexual relationship between individuals in unequal positions (such as faculty and student or supervisor and employee). Consensual romantic or sexual relationships in which one party maintains a direct supervisory or evaluative role over the other party create real or perceived impropriety and may be unethical. These relationships may be less consensual than perceived by the individual whose position confers power. The relationship also may be viewed in different ways by each of the parties, particularly in retrospect. Furthermore, circumstances may change, and conduct that was previously welcome may become unwelcome. Even when both parties have consented at the outset to romantic or sexual involvement, this past consent may not remove grounds for a later charge of a violation of applicable sections of this policy.

For these reasons, dating, romantic, or sexual relationships between students and faculty or students and coaches, including relationships that occur when the College is not in session or students are on leave, are prohibited.³ Faculty and coaches who violate this prohibition are subject to appropriate College adjudication processes and disciplinary action.

³ It is recognized that a spouse or partner of a faculty member or coach may become a student at the College post-marriage. In these cases, the relationship is obviously not prohibited. The on-campus circumstances between the two individuals as faculty member/coach and student should be reviewed and approved by both the supervisor and Human Resources.

For the personal protection of members of this community, relationships in which power differentials are inherent (department chair-faculty, faculty-staff, staff-staff, staff-student, RA-students over whom they have direct responsibility) are generally discouraged. However, if a relationship does exist, persons with direct supervisory or evaluative responsibilities who are involved in such relationships must bring those relationships to the timely attention of their supervisor. It will likely be necessary to remove the employee from the supervisory or evaluative responsibilities or to shift a party out of being supervised or evaluated by someone with whom they have established a consensual relationship. While only faculty-student and coach-student relationships are prohibited by this policy, failure to self-report all other such relationships to a supervisor as required can result in disciplinary action for an employee.

d. Sexual Misconduct

State law defines various violent and/or non-consensual sexual acts as crimes. Additionally, The College of Wooster has defined categories of sexual misconduct, as stated below, for which action under this policy may be imposed. Generally speaking, The College of Wooster considers Non-Consensual Sexual Intercourse violations to be the most serious and, therefore, typically imposes the most severe sanctions, including suspension or expulsion for students and termination for employees. However, The College of Wooster reserves the right to impose any level of sanction, ranging from reprimand up to and including suspension or expulsion/termination, for any act of sexual misconduct or other gender-based offenses, including intimate partner or relationship (dating and/or domestic) violence, non-consensual sexual contact, and stalking, based on the facts and circumstances of the particular complaint. Acts of sexual misconduct and gender-based offenses may be committed by any person upon any other person, regardless of the sex, gender, sexual orientation, and/or gender identity of those involved. Violations include:

i. Sexual Harassment (as defined in section b above)

ii. Non-Consensual Sexual Intercourse⁴

Defined as:

- any sexual penetration or intercourse (anal, oral, or vaginal)
- however slight
- with any object
- by a person upon another person
- that is without consent and/or by force

Sexual penetration includes vaginal or anal penetration by a penis, tongue, finger, or object, or oral copulation by mouth to genital contact or genital to mouth contact.

⁴ The Ohio Revised Code (ORC) defines sexual conduct as, “vaginal intercourse between a male and a female; anal intercourse, fellatio, and cunnilingus between persons regardless of sex; and, without privilege to do so, the insertion, however slight, of any part of the body or any instrument, apparatus, or other object into the vaginal or anal opening of another.” This definition is applicable to criminal prosecutions for sexual conduct (including rape, sexual battery, and unlawful sexual conduct with a minor) in Ohio, but may differ from the definition used by The College of Wooster to address policy violations.

iii. Non-Consensual Sexual Contact⁵

Defined as:

- any intentional sexual touching
- however slight
- with any object
- by a person upon another person
- that is without consent and/or by force

Sexual touching includes any bodily contact with the breasts, groin, genitals, mouth, or other bodily orifice of another individual, or any other bodily contact in a sexual manner.

iv. Sexual Exploitation

Sexual Exploitation refers to a situation in which a person takes non-consensual or abusive sexual advantage of another and situations in which the conduct does not fall within the definitions of Sexual Harassment, Non-Consensual Sexual Intercourse, or Non-Consensual Sexual Contact. Examples of sexual exploitation include, but are not limited to:

- Sexual voyeurism (such as watching a person undressing, using the bathroom, or engaged in sexual acts without the consent of the person observed)
- Taking pictures or video or audio recording another in a sexual act, or in any other private activity, without the consent of all involved in the activity, or exceeding the boundaries of consent (such as allowing another person to hide in a closet and observe sexual activity or disseminating sexual pictures without the photographed person's consent)
- Prostitution
- Sexual exploitation also includes engaging in sexual activity with another person while knowingly infected with human immunodeficiency virus (HIV) or other sexually transmitted disease (STD) and without informing the other person of the infection and further includes administering alcohol or drugs (such as "date rape" drugs) to another person without his or her knowledge or consent

v. Consent

Consent is knowing, voluntary, and clear permission by word or action, to engage in mutually agreed upon sexual activity. Since individuals may experience the same interaction in different ways, it is the responsibility of each party to make certain that the other has consented before engaging in the activity. For consent to be valid there must be a clear expression in words or actions that the other individual consented to that specific sexual conduct.

A person cannot consent if he or she is physically or mentally incapacitated. An individual who engages in sexual activity violates this policy when the individual knows, or should know, that the other person is unable to understand what is happening or is disoriented, helpless, asleep, or

⁵ The ORC definition of sexual contact is, "any touching of an erogenous zone of another, including without limitation the thigh, genitals, buttock, pubic region, or, if the person is a female, a breast, for the purpose of sexually arousing or gratifying either person." This definition is applicable to criminal prosecutions for sexual imposition in the state of Ohio, but may differ from the definition used by The College of Wooster to address policy violations.

unconscious for any reason, including the ingestion of alcohol or other drugs, or is otherwise incapacitated.

Incapacitation is defined as a state where someone cannot make rational, reasonable decisions because they lack the capacity to give knowing consent (e.g., to understand the “who, what, when, where, why, or how” of their sexual interaction). This policy also covers a person whose incapacity results from mental disability, involuntary physical restraint, and/or from the taking of incapacitating drugs.

It is not an excuse that the perpetrator of sexual misconduct was intoxicated and, therefore, did not realize the incapacity of the other.

Consent to some sexual contact (such as kissing or fondling) cannot be presumed to be consent for other sexual activity (such as intercourse). A current or previous dating relationship is not sufficient to constitute consent. The existence of consent is based on the totality of the circumstances, including the context in which the alleged incident occurred and any similar previous patterns that may be evidenced. Silence or the absence of resistance alone is not consent. A person can withdraw consent at any time during sexual activity by expressing in words or actions that he or she no longer wants the act to continue, and, if that happens, the other person must stop immediately.

In Ohio, even if a minor wants to engage in the act, it is a crime, as well as a violation of this policy, if an adult engages in sexual activity with a minor under the age of 18; through the use of force or coercion; with knowledge that the minor is substantially impaired or is not aware that the act is being committed; or if the offender is a teacher, coach, administrator, or other person in authority employed by an institution of higher education.

4. Other Civil Rights Offenses, When the Act is Based upon the Status of a Protected Class

- Threatening or causing physical harm, extreme verbal abuse, or other conduct which threatens or endangers the health or safety of any person on the basis of their actual or perceived membership in a protected class
- Discrimination, defined as actions that deprive other members of the community of educational or employment access, benefits or opportunities on the basis of their actual or perceived membership in a protected class
- Intimidation, defined as implied threats or acts that cause an unreasonable fear of harm in another on the basis of actual or perceived membership in a protected class
- Hazing, defined as doing any act or coercing another, including the victim, to do any act of initiation into any student or other organization that causes or creates a substantial risk of causing mental or physical harm to any person. Hazing is not only prohibited by The College of Wooster, but is illegal under Ohio law.
- Bullying, defined as repeated and/or severe aggressive behavior likely to intimidate or intentionally hurt, control, or diminish another person, physically or mentally on the basis of actual or perceived membership in a protected class
- Violence between those in an intimate relationship to each other on the basis of actual or perceived membership in a protected class (this includes romantic relationships, dating,

domestic⁶, and/or relationship violence⁷)

- Stalking⁸, defined as a course of conduct directed at a specific person on the basis of actual or perceived membership in a protected class that is unwelcome and would cause a reasonable person to feel fear⁹
- Any other College of Wooster rules, when a violation is motivated by the actual or perceived membership of the victim on the basis of sex or gender or in a protected class, may be pursued using this policy and process

Sanctions for the above-listed “Other Civil Rights Offenses” range from reprimand up through and including expulsion (students) or termination of employment.

5. Confidentiality and Reporting of Offenses under this Policy

College of Wooster officials, depending on their roles at the College, have varying reporting responsibilities and abilities to maintain confidentiality. In order to make informed choices, one should be aware of confidentiality and mandatory reporting requirements when consulting campus resources. On campus, some resources may maintain confidentiality, offering options and advice without any obligation to inform an outside agency or individual unless you have requested information to be shared. Other resources exist for you to report crimes and policy violations, and these resources will take action when you report victimization to them.

The following describes the three reporting options at The College of Wooster:

a. **Anonymous Reporting**

If a reporting party would like the details of an incident to be kept anonymous (no personally identifiable information to be shared), the reporting party may speak with licensed counselors in the Longbrake Student Wellness Center; off-campus local rape crisis counselors, domestic violence resources, local or state assistance agencies; or on- or off-campus members of the clergy/chaplains who will maintain confidentiality except in extreme cases of immediacy of threat or danger or abuse of a minor. Campus counselors and/or the Employee Assistance Program are available to help free of charge and can be seen on an emergency basis. College of Wooster employees to whom anonymous reports can be made will submit anonymous statistical

⁶ Domestic violence is defined by Ohio law as knowingly or recklessly causing or attempting to cause physical harm, or, by threat of force, causing a belief that the offender will cause imminent physical harm, to a household or family member. This definition is applicable to criminal prosecutions for domestic violence in Ohio, but may differ from the definition used on campus to address policy violations.

⁷ Example 1: Employee A has been in an intimate relationship with Employee B for over a year; Employee A punches Employee B in the face during an argument (Dating Violence). Example 2: Student A has been in an intimate relationship with Student B for over a year; Students A & B live together. During an argument, Student A shoves Student B to the ground (Domestic Violence).

⁸ The state definition of stalking is engaging in a pattern of conduct which knowingly causes another person to believe the offender will cause physical harm or mental distress to the other person, whether or not such conduct is sexually motivated. This definition is applicable to criminal prosecutions for stalking in Ohio, but may differ from the definition used on campus to address policy violations.

⁹ Example 1: Employee A recently ended an intimate relationship with Employee B. For the past three weeks, B has been sending A 100 text messages per day and waits by A’s car at the end of each day to beg and plead with her to take him back. When she refuses, he loses control, makes threatening gestures, and tells her she will regret this. Employee A indicates she is fearful of what B might do to her (Stalking). Example 2: Mark is a student on campus who has always been fascinated by women who dye their hair. One day, he notices Mary Lou, whose hair is dyed a very bright purple. He follows her home to see where she lives, and begins to track her history, actions and movements online. His fascination increases to the point where he follows her frequently on campus, takes pictures of her without her permission, and spies through her window at night with a long-range camera lens. He wants to have her beautiful purple hair for his own, so that he can stroke it whenever he wants.

information for Clery Act purposes unless they believe it would be harmful to the victim.

b. Confidential Reporting

Complainants are encouraged to speak to College of Wooster officials, such as the Title IX Coordinator or a Deputy Title IX Coordinator, Dean of Students Staff, Campus Security, or the AVP of HR to make formal reports of incidents of sexual misconduct. Complainants are in control of how much information they share and when and with whom they share it. Confidentiality will be maintained to the fullest extent possible to preserve a complainant's identity and privacy.

c. Mandatory Reporting

All College employees, including RAs, are mandatory reporters. If they are aware of an allegation of discrimination, harassment, retaliation, and/or sexual misconduct, they must report it to one of the officials named above. Details of the allegation will not be shared unless there is a pattern of abuse or cause for fear for the safety of the complainant or the safety of others or the misconduct is a felony that is required by law to be reported. If personally identifiable information is shared, it will be shared with as few people as possible, and all efforts will be made to protect privacy to the greatest possible extent.

d. Formal Reporting Options

Complainants have the right, and can expect, to have complaints taken seriously by The College of Wooster when formally reported, and to have those incidents investigated and properly resolved. Victims of campus crime should be aware that charges may be pursued through the College's judicial system, through the state judicial system, or both.

The judicial system at The College of Wooster is designed to address infractions of the Codes of Social Responsibility and Academic Integrity and policies of the College. The College's judicial system does not establish whether a crime has been committed. For more information concerning the College's judicial system, please refer to Section XV of the Code of Social Responsibility, which is found in The Scot's Key.

Victims of crime may also seek redress through the state judicial system. Charges may be filed with the local police department or other appropriate authorities. The Office of Security and Protective Services is prepared to assist any member of the campus community in reporting crime to appropriate law enforcement officials.

Formal reporting still affords privacy to the reporter, and only a small group of officials who need to know will be told. Information will be shared as necessary with investigators, witnesses, and the accused student/respondent. The circle of people with this knowledge will be kept as tight as possible to preserve a complainant's rights and privacy.

6. Remedial Action

The College of Wooster will implement initial remedial and responsive and/or protective actions upon notice of alleged harassment, retaliation, and/or discrimination whether or not charges are pending through the College's judicial system and/or the state judicial system; persons who make a complaint (complainants) and those against whom a complaint is filed (respondents) are entitled to the same

remedial actions. Such actions could include but are not limited to: no contact orders, providing counseling and/or medical services, academic support, living arrangement adjustments, providing a campus escort, academic or work schedule and assignment accommodations, safety planning, and/or referral to campus and community support resources.

The College of Wooster will take additional, prompt, remedial and/or disciplinary action with respect to any member of the community, guest, or visitor who has been found to engage in harassing or discriminatory behavior or retaliation. Deliberately false and/or malicious accusations of harassment, as opposed to grievances which, even if erroneous, are made in good faith, are just as serious an offense as harassment and will be subject to appropriate disciplinary action.

7. Retaliation

Retaliation is defined as any adverse action taken against a person participating in a protected activity because of their participation in that protected activity. Retaliation against an individual for alleging harassment, showing support for a complainant, or for assisting in providing information relevant to a claim of harassment is a serious violation of The College of Wooster policy and will be treated as another possible instance of harassment or discrimination. Acts of alleged retaliation should be reported immediately to the Title IX Coordinator or a Deputy Title IX Coordinator and will be promptly investigated. The College of Wooster is prepared to take appropriate steps to protect individuals who fear that they may be subjected to retaliation.

8. Federal Timely Warning Obligations

Victims of sexual misconduct should be aware that The College of Wooster administrators must issue timely warnings for incidents reported to them that pose a substantial threat of bodily harm or danger to members of the campus community. The College will make every effort to ensure that a victim's name and other identifying information is not disclosed, while still providing enough information for community members to make safety decisions in light of the potential danger.