

Bates College

2026 Annual Campus Safety and Fire Report

Reporting for January 1, 2025, through December 31, 2025



Table of Contents

Introduction	5
The Jeanne Clery Campus Safety Act.....	5
Annual Report 2026 — Campus Crime, Fire, Alcohol, and Illegal Drugs	5
Preparation of Disclosure of Crime Statistics	5
Campus Safety Department.....	6
Training.....	6
Campus Enforcement Authority	6
Key Partnerships.....	7
Security and Access.....	8
Crime Prevention Resources and Services	9
Campus Security Authorities	12
Bates College Campus Security Authorities.....	12
Reporting Criminal Activities or Incidents	14
Anonymous/Confidential Reporting.....	15
Definitions of Crimes — The Clery Act	16
Violence Against Women Act Offenses.....	17
Hate Crime Definitions	18
Crime Statistics Report.....	20
Offenses by Hierarchy	20
Offenses Reported Not by Hierarchy.....	22
Hate Crimes	23
On-Campus Hate Crimes.....	23
Residence Halls Hate Crimes	23
Non-Campus Hate Crimes.....	24
Public Property Hate Crimes.....	25
Equal Opportunity, Non-Discrimination, and Anti-Harassment Policy	27
1. Overview: Institutional Values and Community Principles	27
2. Scope of Policy.....	29
3. Jurisdiction	30
4. Notice of Non-Discrimination	31
5. Privacy and Confidentiality.....	35
6. Online Harassment and Misconduct.....	41
7. Inclusion Related to Gender Identity and Expression	41

8. Prohibited Conduct and Definitions	42
9. Consent and Related Definitions	51
10. Resources	54
11. Reporting.....	62
12. Supportive Measures and Protective Actions.....	70
13. Initial Review and Resolution Options	73
Sex Offender Registration	84
Risk Reduction and Warning Signs of Abusive Behavior	85
Timely Warnings	87
Campus Emergency Response & Evacuation Procedures	89
Emergency Preparedness	89
Emergency Notification System.....	90
Emergency Response and Evacuation Testing Procedures.....	90
Emergency Procedures.....	90
Weather Emergencies.....	91
Evacuation Procedures.....	92
Shelter-in-Place Procedures	92
Basic Shelter-in-Place Guidance	92
How You Will Know to Shelter in Place	92
How to Shelter in Place.....	92
Missing Student Notification Policy for Students Who Reside in On-Campus Housing.....	94
The College Alcohol and Drug Policy	95
Violating the college’s alcohol and cannabis policy.....	95
Illegally possessing, using, or distributing any scheduled drugs.....	96
Support Resources for Alcohol or Drug Abuse	98
2025 Annual Fire Safety Report	99
Fire Protection Equipment/Systems	100
Fire Evacuation Plan	100
Housing Policies	101
Cooking	101
Flammable Materials.....	101
Electrical Appliances.....	101
Electrical Safety.....	101
Fire Protection and Combustible Materials.....	101
Smoking.....	102

Fire Safety Tips	103
Fire Drills/Evacuation	103
Fire Safety Equipment.....	103
Prevention	103
Student Housing Fire Safety System	104
Student Housing Fire Log.....	106

Introduction

The Jeanne Clery Campus Safety Act

The Jeanne Clery Campus Safety Act requires the distribution of an annual security report to all current students, faculty, and staff. This annual report includes statistics for the previous three years concerning reported crimes that occurred on campus, in certain off-campus buildings, on property owned or controlled by Bates College, and on public property within or immediately adjacent to and accessible from the campus. The report also includes institutional policies concerning campus security, such as policies concerning alcohol and drug use, crime prevention, the reporting of crimes, sexual assault, domestic and dating violence, stalking, and fires in campus residential buildings.

Annual Report 2026 — Campus Crime, Fire, Alcohol, and Illegal Drugs

This information is provided to meet the requirements of the Jeanne Clery Campus Safety Act and has been prepared by Campus Safety for the period January 1, 2025, through December 31, 2025.

Each fall, email notification is made to students and employees providing a link to this report. This URL also appears on the websites of Human Resources and Admission to inform prospective students and employees.

You can access this report via bates.edu/campus-safety.

Preparation of Disclosure of Crime Statistics

Campus Safety prepares this report to comply with the Jeanne Clery Campus Safety Act. This report is prepared in cooperation with the Lewiston Police Department, Lewiston Fire Department, other law enforcement agencies, Dean of Students Office, Associate Dean of Students for the Office of Community Standards, Associate Vice President for Title IX and Civil Rights Compliance, and Office of Residence Life.

Information on campus crime, arrest, and referral statistics includes those reported to Campus Safety, designated campus officials, and the Lewiston Police Department. These statistics may also include crimes that have been reported through Health Services or Counseling and Psychological Services on a voluntary or confidential basis.

Campus Safety Department

The Bates Campus Safety Department is located at 245 College Street, Lewiston, Maine. The phone number is 207-786-6254. The department reports to the Student Affairs division. Campus Safety staff comprises the Director of Campus Safety, four patrol supervisors, one electronic access system manager, one assistant access control manager, 12 full-time patrol officers, one full-time communication specialist, one operations manager, and shuttle drivers. The department provides services 24 hours a day, 365 days a year.

Training

Campus Safety requires robust, ongoing training for all staff. New officers undergo 160 hours of supervised patrol field training and at least 36 hours of dispatch training, with full competency required across all training areas. All personnel must attend monthly department training sessions and fulfill annual training requirements based on best practices. All training is overseen by a dedicated Training Officer. Officers may also attend select workshops and training seminars that are relevant to campus safety and security. All training is guided by current laws and best practices.

Campus Safety officers are overseen by an on-duty supervisor and patrol the campus 24 hours a day using motor vehicles, bicycles, and foot patrols. During the academic year, Campus Safety provides a student safety shuttle service during evening hours.

The Campus Safety Communications Office is staffed by trained dispatchers/officers and operates on a 24-hour basis. They monitor a network of security cameras and life-safety alarm systems, and receive all calls for emergency and routine service. Communication officers dispatch the appropriate response to a call for service. Campus Safety officers respond to and investigate reported incidents and policy violations.

Campus Enforcement Authority

The Campus Safety department comprises non-sworn campus safety officers whose law enforcement authority and authority to use a reasonable degree of force is limited to that which is granted to any private citizen under Maine law (17-A M.R.S. § 16 and 17-A M.R.S. § 108). Officers have the authority to issue parking citations on Bates College property.

Campus Safety officers are authorized to request identification and verify whether individuals have lawful business on the Bates College campus. When incidents require additional enforcement, resources, joint investigative efforts, or official crime reporting, Campus Safety works closely with local law enforcement to exchange relevant information as deemed necessary. Campus Safety coordinates with the Lewiston Police Department or other enforcement agency for crimes committed within the Clery geography.

Key Partnerships

Lewiston Police Department

141 Mill Street
Lewiston ME 04240
Phone: 207-513-3001

Androscoggin County Sheriff's Office

2 Turner Street
Auburn ME 04210
Phone: 207-753-2500

Maine State Police

42 State House Station
Augusta ME 04333
Physical address: 45 Commerce Drive, Augusta ME
Phone: 207-624-7200

Security and Access

The Bates College campus grounds are open to the public. Most academic and administrative buildings are available to authorized members of the campus community, to official visitors, and to individuals who have legitimate business needs during scheduled hours. Buildings are currently secured by key-locks and/or electronic access control. Entry into buildings after scheduled hours is available only to faculty, staff, and authorized students as determined by the appropriate academic or administrative office.

Academic and administrative buildings are patrolled by Campus Safety officers. Many buildings are alarmed and monitored by security cameras for the protection of contents and people. The alarms are activated when forced or prohibited entry is made. These alarms are monitored at Campus Safety dispatch, and Campus Safety officers respond immediately to an alarm location.

All residence halls are secured 24 hours a day. They are equipped with an electronic card access system that allows authorized students and other approved members of the college community to gain access with their Bates College I.D. at designated exterior doors. It is a college policy violation to permit unauthorized access into college buildings.

Residence Life Area Coordinators perform regular student housing building checks. Residence hall staffers are also assigned to each residence hall. Safety and security checks made in the residence halls are conducted to detect damage to facilities and any suspicious activities. Any suspicious activity, suspicious person(s), or crimes in progress are expected to be reported immediately to Campus Safety.

Bates College facilities and landscaping are maintained in a manner that minimizes hazardous conditions and safety concerns. Campus Safety officers continuously patrol the campus and report unsafe conditions to facilities for repair.

Crime Prevention Resources and Services

The Bates College crime prevention program plays an important role in the college community. Campus Safety operates under the assumption that it is a component of the educational process for students, faculty, and staff in the community. The program relies on a teamwork approach.

Prior to the start of the academic year, during First-Year Experience and New Student Orientation, students begin to learn about the various services offered by Campus Safety. Throughout the year, in cooperation with Residence Life and the Office of Campus Life, Campus Safety officers give myriad presentations that explain ways to maintain personal safety and residence hall security. Similar information about campus safety is presented to new employees as part of new-employee orientation. Crime prevention programs and sexual assault prevention programs are offered on an ongoing basis.

Here is a list of the crime prevention programs and projects operated by Campus Safety:

Community Engagement Program

A major objective of community-engagement efforts is to establish an active partnership between Campus Safety and the community to analyze problems and help implement community-based solutions and services. For this reason, Campus Safety makes a conscious effort to create an atmosphere in which community partners actively and willingly cooperate with our office. For example, in 2025, Campus Safety provided safe recreation opportunities including an outdoor movie night, a softball game between students and the Lewiston Police Department, and several classes teaching situational awareness and self-defense.

Bicycle Registration and Loss Prevention Program

Campus Safety engages in proactive efforts to help deter bicycle theft and to assist in returning lost and stolen bicycles. Bates provides outdoor racks and designated bicycle storage rooms, and strongly recommends that bicycles be registered (at no charge) with Campus Safety, which sponsors regular bicycle registration events. Bicycles parked at any location on campus should always be secured to a bike rack or post with a strong lock. U-bolt locks are recommended and are available for purchase in the Bates College Store.

Safe Ride Shuttle and Safety Escort Program

The Safe Ride Shuttle and Safety Escort Program provides 24/7 personal safety escorts for students anywhere on campus. Escorts are provided by motor vehicle or golf cart, or on foot. During Bobcat Express operating hours, shuttle drivers provide safety escorts. After hours, Campus Safety officers provide them upon request.

First-Year Experience and New Student Orientation

Campus Safety, in partnership with Residence Life and First-Year Experience, conducts orientation sessions for first-year students and new students to review available campus supports and personal safety practices. These presentations equip students with actionable tips for securing their dorm rooms, protecting personal belongings, and navigating campus safely. Additionally, all

new-student identification cards feature an emergency-contact QR code linking to information about safety services and emergency contacts.

Crime Prevention Presentations

Officers conduct crime awareness and prevention programs in residence halls and elsewhere on campus throughout the academic year.

New Employee Orientation

Onboarding sessions by Human Resources provide new employees with campus safety and security information including the location of the department, contact information, and how to opt in to emergency alert notifications.

Event Security

Campus Safety works with event organizers to ensure that events are safe for participants.

Security Alarm Systems

A sophisticated computer-enhanced alarm system monitors a campus-wide network of intrusion and duress alarms.

Printed Crime Prevention Materials

Brochures and posters carrying information related to residence hall safety and security, bicycle safety, and sexual assaults are widely distributed at crime prevention presentations and available at the Campus Safety office.

Emergency Notification and Timely Warnings

Under the Clery Act, Bates Campus Safety and authorized Student Affairs staff issue alerts using a two-tiered system based on the nature and urgency of a threat. Emergency Notifications are triggered immediately upon confirmation of an ongoing or imminent threat to health and safety on campus. Timely Warnings are distributed campus-wide regarding specific Clery-defined crimes that occurred on or near campus and represent a continuing threat. These warnings provide details about the incident and actionable safety advice to help community members protect themselves and prevent similar occurrences. All notifications and warnings are distributed via email, phone, text message, and the Bates College website, bates.edu, including the Bates College Emergency Management website, emergency.bates.edu.

Security Blue Light Emergency Phones

Security Blue Light phones are located throughout the campus including walkways, athletic facilities, academic buildings, and residence halls. Campus Safety promotes and encourages the use of these phones. The security phones are activated with the push of a button to call Campus Safety. The security phones are routinely checked and maintained by Information and Library Services technicians.

If a phone is activated and the Campus Safety officer does not receive a response, another officer is immediately dispatched to that location. Security phones may be used to contact Campus Safety for any reason, such as to request an escort, report a suspicious person, or report an emergency.

Campus Lighting

Routine grounds maintenance includes trimming trees and shrubs that might obstruct lighting or be hazardous to the safety of students and others walking on campus, especially at night. The ongoing maintenance and upgrading of lighting is part of the annual workflow of facilities services.

Laptop Theft Prevention

Information on laptop theft prevention, along with tracking software in case a laptop is stolen, is provided to the campus community.

Green Dot Bystander Intervention

Green Dot is a comprehensive, strategic, and research-based approach to violence prevention. Green Dot training, while primarily focused on eradicating power-based personal violence, is applicable for everything from physical or sexual violence to inappropriate language to dorm damage and more. The program leverages peer-to-peer influence to shift and change cultural expectations.

Campus Security Authorities

Campus Security Authority (CSA) is a Clery Act–specific term that encompasses four groups of individuals and organizations associated with an institution:

- A campus police department or a campus safety department of an institution;
- Any individual or individuals who are responsible for campus security but who do not constitute a campus police department or a campus security department (e.g., an individual who is responsible for monitoring the entrance to institutional property);
- Any individual or organization specified in an institution’s statement of campus security policy as an individual or organization to which students and employees should report criminal offenses;
- An official of an institution who has significant responsibility for student and campus activities, including but not limited to student housing, student discipline, and campus judicial proceedings. An official is defined as any person who has the authority and duty to take action or respond to particular issues on behalf of the institution.

Bates College Campus Security Authorities

Department	Location(s)	Phone Number	Persons Included
Athletics	Alumni Gym (130 Central Ave.), Merrill Gym (141 Russell St.)	207-786-6341	Director, Assistant Directors, Coaches, Student Monitors
Campus Life	Chase Hall (56 Campus Ave.)	207-786-6305	Associate Dean, Assistant Dean, Assistant Director
Campus Safety	245 College St.	207-786-6254	Director, Operations Manager, Campus Safety Officers, Communication Officers
Center for Global Education	Roger Williams Hall (9 Andrews Road)	207-786-6223	Associate Dean, Assistant Dean, Assistant Directors
Dining, Conferences, and Campus Events	Commons (136 Central Ave.)	207-786-6400	Associate Vice President, Assistant Directors, Managers
Dean of the Faculty's Office	Lane Hall (2 Andrews Rd.)	207-786-6066	Vice President, Dean, Associate Deans, Assistant Deans
Environmental Health and Safety	220 College St.	207-786-6413	Director, Health and Safety Specialist
Equity and Inclusion Office	Lane Hall (2 Andrews Road)	207-786-6031	Vice President, Program Manager

Harvard Center	161 Wood St.	207-786-6202	Directors, Assistant Directors
Health Services	31 Campus Ave.	207-786-6199	Director
Human Resources	215 College St.	207-786-6140	Associate Vice President, Senior Director, Directors
Residence Life and Health Education	Chase Hall (56 Campus Ave.)	207-786-6215	Associate Dean, Associate Directors, Coordinators, Student Employees
Student Affairs	Chase Hall (56 Campus Ave.)	207-786-6219	Vice President, Associate Vice President, Dean, Senior/Associate Deans, Assistant Deans, Directors, Assistant Directors, Coordinators
Student Center for Belonging and Community	Chase Hall (56 Campus Ave.)	207-786-8303	Associate Dean, Assistant Directors, Coordinators
Non-Discrimination Team	Lane Hall (2 Andrews Road)	207-786-6445	Associate Vice President for Title IX and Civil Rights Compliance, Deputy Title IX Coordinators

Reporting Criminal Activities or Incidents

All community members, students, faculty, staff, and guests are encouraged to report crimes and public safety incidents promptly. Criminal activity can be reported 24/7 to Campus Safety officers or to local law enforcement using the phone numbers below:

- Campus Safety (Routine/Non-Emergency): 207-786-6254
- Campus Safety (Urgent): 207-786-6111
- Lewiston Police / Emergency Services: 911

You may also make a report to any Campus Security Authority listed above using the phone numbers provided.

If you prefer confidential reporting, you can visit Campus Safety at 245 College St., Lewiston, Maine, to learn about available support resources or contact local police directly.

Additionally, strategically located security phones on the Bates campus provide a direct line to Campus Safety by pushing the red button. Anyone may use these phones to report a criminal incident, fire, or other type of urgent request, or to request assistance of any kind from Campus Safety.

When calling Campus Safety, please provide the following information:

- Your name
- Location and description of the incident you are reporting
- A description of any vehicles or suspects involved in the incident

The most important thing to remember is that suspicion of a crime does not require proof. If you suspect that a crime is being committed or has been committed, call Campus Safety or 911 immediately.

Campus Safety is responsible for the reporting and follow-up of any criminal incident that occurs within Bates College's Clery geography. When a crime is reported to Campus Safety or other appropriate officials of the college, it will be investigated by Campus Safety and/or the police. The college takes all reports of criminal activity seriously and acts in accordance with applicable laws and safety standards.

Depending on the affiliation of a person suspected of a crime, internal investigations may be conducted by the Office of Community Standards, Title IX and Civil Rights Compliance, Human Resources, or other college officials.

Anonymous/Confidential Reporting

If you are a victim of a crime and do not want to pursue action within the college system or the criminal justice system, you may still want to consider making a confidential report. Depending on the nature of the report and with your permission, Campus Safety can file a report on the details of the incident without revealing your identity. The purpose of a confidential report is to comply with your wish to keep the matter confidential, while taking steps to ensure your future safety and the safety of others. With such information, the college can keep an accurate record of the number of incidents involving students; determine where there may be a pattern of crime with regard to a particular location, method, or assailant; and alert the campus community to potential danger. Reports filed in this manner are anonymously counted and disclosed in the annual crime statistics for the college.

Individuals may also report with complete anonymity using the secure Anonymous Reporting Form hosted by EthicsPoint, which allows anyone to report suspected misconduct or other concerns anonymously. This service allows the college to communicate with the person making the report while maintaining complete confidentiality. EthicsPoint stores all information regarding these reports on their secure servers. These reports are investigated by the appropriate college officials.

Definitions of Crimes — The Clery Act

The following definitions are to be used for reporting crimes listed in the Clery Act in accordance with the Federal Bureau of Investigation's Uniform Crime Reporting Program. The definitions for murder, robbery, aggravated assault, burglary, motor vehicle theft, weapons violations (carrying, possessing, etc.), drug abuse violations, and liquor law violations are from the Uniform Crime Reporting Handbook. The definitions of sex offenses are excerpted from the National Incident-Based Reporting System edition of the Uniform Crime Reporting Handbook. The definitions of larceny-theft, simple assault, intimidation, and destruction/damage/vandalism of property come from the Hate Crime Data Collection Guidelines of the Uniform Crime Reporting Handbook.

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.

Aggravated Assault: The 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 into a building or other structure with the intent 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 larceny; housebreaking; safecracking; and all attempts to commit any of the aforementioned.

Hazing: The Campus Safety Hazing Act defines the term hazing to mean “any intentional, knowing, or reckless act committed by a person (whether individually or in concert with other persons) against another person or persons regardless of the willingness of such other person or persons to participate, that (1) is committed in the course of an initiation into, an affiliation with, or the maintenance of membership in, a student organization (e.g., a club, athletic team, fraternity, or sorority); and (2) causes or creates a risk, above the reasonable risk encountered in the course of participation in the IHE [Institution of Higher Education] or the organization, of physical or psychological injury.”

Murder/Non-negligent Manslaughter: The willful (non-negligent) killing of one human being by another.

Negligent Manslaughter: The killing of another person through gross negligence.

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.

Weapons Law Violation: 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. This classification encompasses weapons offenses that are regulatory in nature.

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.

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, manufacturing, 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.

Larceny-Theft: The unlawful taking, carrying, leading, or riding away of property from the possession or constructive possession of another person.

Motor Vehicle Theft: The theft or attempted theft of a motor vehicle. (Classify as motor vehicle theft all cases where automobiles are taken by persons not having lawful access even though the vehicles are later abandoned, including joyriding.)

Violence Against Women Act Offenses

Sexual Assault: Any sexual act directed against another person, without the consent of the victim, including instances where the victim is incapable of giving consent. This includes any offense that meets the definition of Rape, Fondling, Incest, or Statutory Rape as used in the FBI's UCR program and included in Appendix A of 34 CFR Part 668.

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. This offense includes the rape of all gender identities.

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 their age or because of their temporary or permanent mental incapacity.

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

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

Domestic Violence: A felony or misdemeanor crime of violence committed by a current or former spouse or intimate partner of the victim, a person with whom the victim shares a child in common, a person who is cohabiting with the victim as a spouse or intimate partner, a person situated similarly to a spouse of the victim under the domestic or family violence laws of the jurisdiction in

which the crime of violence occurred, or 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.

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 consideration of the following factors: the length of the relationship; the type of relationship; and the frequency of interaction between the persons involved in the relationship. For the purposes of this definition, dating violence includes, but is not limited to, sexual or physical abuse or the threat of such abuse. Dating violence does not include acts covered under the definition of domestic abuse.

Stalking: Engaging in a course of conduct directed at a specific person that would cause a reasonable person to fear for their safety or the safety of others; or suffer substantial emotional distress.

Hate Crime Definitions

Hate Crime: A crime 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 the victim.

Although there are many possible categories of bias, under the Clery Act, only the following eight categories are reported:

1. **Race:** A preformed negative attitude toward a group of persons who possess common physical characteristics, e.g., color of skin, eyes, and/or hair; facial features, etc., genetically transmitted by descent and heredity which distinguish them as a distinct division of humankind, e.g., Asian, Black or African American, white.
2. **Religion:** A preformed negative opinion or attitude toward a group of persons who share the same religious beliefs regarding the origin and purpose of the universe and the existence or nonexistence of a supreme being, e.g., Catholics, Jews, Protestants, Atheists, Muslims.
3. **Sexual Orientation:** A preformed negative opinion or attitude toward a group of persons based on their actual or perceived sexual orientation.
4. **Gender:** A preformed negative opinion or attitude toward a person or group of persons based on their actual or perceived gender.
5. **Gender Identity:** A preformed negative opinion or attitude toward a person or group of persons based on their actual or perceived gender identity, e.g., bias against transgender or gender-non-conforming individuals.
6. **Ethnicity:** A preformed negative opinion or attitude toward a group of people whose members identify with each other through a common heritage, often consisting of a common language, common culture, and/or ideology that stresses common ancestry.
7. **National Origin:** A preformed negative opinion or attitude toward a group of people based on their actual or perceived country of birth.
8. **Disability:** A preformed negative opinion or attitude toward a group of persons based on physical or mental disability, temporary or permanent, congenital or acquired by heredity, accident, injury, advanced age, or illness.

For purposes of reporting under the Clery Act, a hate crime is defined as including the offenses of criminal homicide, sex offenses, robbery, aggravated assault, burglary, motor vehicle theft, arson,

larceny-theft, simple assault, intimidation, criminal mischief/vandalism, and any other crime involving bodily injury.

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 bone, loss of teeth, possible internal injury, severe laceration, or loss of consciousness.

Criminal Mischief/Vandalism: To willfully or maliciously destroy, damage, disfigure, or deface any public or private property, real or personal, without the consent of the owner or the person having custody or control, by cutting, tearing, breaking, marking, painting, drawing, covering with filth, or any other such means as may be specified by local law.

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.

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.

Crime Statistics Report

The statistical reports for calendar years 2023, 2024, and 2025 are shown at the Campus Safety website at bates.edu/campus-safety. The following list of geographic definitions is provided for better understanding of how statistics are counted and categorized:

On Campus

- 1. Any building or property owned or controlled by an institution of higher education within the same reasonable 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
- 2. Any building or property that is, or is reasonably contiguous to, the area 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).

On-Campus Student Housing Facilities

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 Building or Property

- 1. Any building or property owned or controlled by a student organization that is officially recognized by the institution; and
- 2. Any building or property owned or controlled by the institution that is used in direct support of, or in relation to, the institution’s educational purposes, is frequently used by students, and is not within the same reasonably contiguous geographic area of the institution.

Public Property

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

Offenses by Hierarchy

Offense by Hierarchy	Year	On-Campus	Non-Campus	Public Property	Total	Residential Facilities*	Unfounded Crimes
Aggravated Assault	2025	0	0	0	0	0	0
	2024	0	0	0	0	0	0
	2023	0	0	0	0	0	0

Burglary	2025	9	1	0	10	9	0
	2024	5	0	0	5	4	0
	2023	3	0	0	3	3	0
Motor Vehicle Theft	2025	1	0	0	1	0	0
	2024	2	0	0	2	0	0
	2023	2	0	1	3	0	0
Liquor Law Arrests	2025	0	0	3	3	0	0
	2024	0	0	7	7	0	0
	2023	0	0	10	10	0	0
Drug Law Arrests	2025	0	0	4	4	0	0
	2024	0	0	0	0	0	0
	2023	0	0	0	0	0	0
Weapons Law Arrests	2025	0	0	0	0	0	0
	2024	0	0	0	0	0	0
	2023	0	0	0	0	0	0
Liquor Law Violations Referred for Disciplinary Action	2025	83	0	4	87	68	0
	2024	64	0	3	67	51	0
	2023	59	1	2	62	39	0
Murder/Non-negligent Manslaughter	2025	0	0	0	0	0	0
	2024	0	0	0	0	0	0
	2023	0	0	0	0	0	0
Manslaughter by Negligence	2025	0	0	0	0	0	0
	2024	0	0	0	0	0	0
	2023	0	0	0	0	0	0
Rape	2025	3	0	0	3	3	0
	2024	3	0	0	3	3	0
	2023	2	0	0	2	2	0
Forcible Fondling	2025	2	0	0	2	1	0
	2024	0	0	1	1	0	0
	2023	2	0	0	2	2	0
Incest	2025	0	0	0	0	0	0
	2024	0	0	0	0	0	0
	2023	0	0	0	0	0	0

Statutory Rape	2025	0	0	0	0	0	0
	2024	0	0	0	0	0	0
	2023	0	0	0	0	0	0
Robbery	2025	1	0	0	1	0	0
	2024	0	0	0	0	0	0
	2023	0	0	0	0	0	0

* Note: Residential Facility Crime Statistics are a subset of the On-Campus Category; i.e., they are counted in both categories.

Offenses Reported Not by Hierarchy

Offense Reported Not by Hierarchy	Year	On Campus	Non-Campus	Public Property	Total	Residential Facilities*	Unfounded Crimes
Drug Law Violations Referred for Disciplinary Actions	2025	13	0	0	13	13	0
	2024	9	0	0	9	9	0
	2023	18	0	0	18	17	0
Weapons Law Violations Referred for Disciplinary Actions	2025	0	0	0	0	0	0
	2024	0	0	0	0	0	0
	2023	0	0	1	1	0	0
Arson	2025	0	0	0	0	0	0
	2024	1	0	1	1	1	0
	2023	0	0	0	0	0	0
Dating Violence	2025	1	0	0	1	1	0
	2024	0	0	0	0	0	0
	2023	3	0	0	3	3	0
Domestic Violence	2025	0	0	1	1	0	0
	2024	0	0	0	0	0	0
	2023	0	0	0	0	0	0
Stalking	2025	1	0	0	1	1	0
	2024	0	0	0	0	0	0
	2023	2	0	0	2	0	0
Hazing	2025	0	0	0	0	0	0

* Note: Residential Facility Crime Statistics are a subset of the On-Campus Category; i.e. they are counted in both categories.

Hate Crimes

The following statistics are reported for crimes that have manifest evidence that the victim was intentionally selected because of the victim's actual or perceived race (R), gender (G), gender identity (GI), religion (RE), sexual orientation (SO), ethnicity (E), national origin (NO), or disability (D).

On-Campus Hate Crimes

On-Campus Hate Crimes	2023								2024								2025							
Types of Bias	R	G	GI	RE	SO	E	NO	D	R	G	GI	RE	SO	E	NO	D	R	G	GI	RE	SO	E	NO	D
Aggravated Assault	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Arson	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Burglary	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Forcible Sex Offense	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Larceny	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Negligent Manslaughter	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Murder and Non-negligent Manslaughter	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Motor Vehicle Theft	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Robbery	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Simple Assault	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Intimidation	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Vandalism	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

Residence Halls Hate Crimes

Residence Halls Hate Crimes	2023								2024								2025							
Types of Bias	R	G	GI	RE	SO	E	NO	D	R	G	GI	RE	SO	E	NO	D	R	G	GI	RE	SO	E	NO	D
Aggravated Assault	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

Arson	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Burglary	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Forcible Sex Offense	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Larceny	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Negligent Manslaughter	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Murder and Non-negligent Manslaughter	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Motor Vehicle Theft	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Robbery	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Simple Assault	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Intimidation	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Vandalism	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

Non-Campus Hate Crimes

Non-Campus Hate Crimes	2023								2024								2025							
Types of Bias	R	G	GI	RE	SO	E	NO	D	R	G	GI	RE	SO	E	NO	D	R	G	GI	RE	SO	E	NO	D
Aggravated Assault	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Arson	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Burglary	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Forcible Sex Offense	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Larceny	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Negligent Manslaughter	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

Murder and Non-negligent Manslaughter	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Motor Vehicle Theft	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Robbery	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Simple Assault	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Intimidation	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Vandalism	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

Public Property Hate Crimes

Public Property Hate Crimes	2023								2024								2025							
Types of Bias	R	G	GI	RE	SO	E	NO	D	R	G	GI	RE	SO	E	NO	D	R	G	GI	RE	SO	E	NO	D
Aggravated Assault	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Arson	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Burglary	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Forcible Sex Offense	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Larceny	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Negligent Manslaughter	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Murder and Non-negligent Manslaughter	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Motor Vehicle Theft	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Robbery	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Simple Assault	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

Intimidation	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Vandalism	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

Equal Opportunity, Non-Discrimination, and Anti-Harassment Policy

This policy covers all bias, harassment, and discrimination, including Sexual Assault, Dating and Domestic Violence, and Stalking. The text below reflects the policy at the time of the posting of this document. A full policy, including any updates that may have been made since the posting of this report can be found at the website bates.edu/here-to-help.

1. Overview: Institutional Values and Community Principles

Bates College values the diversity of persons, perspectives, and convictions. Critical thinking, rigorous analysis, and open discussion of a full range of ideas lie at the heart of the college's mission as an institution of higher learning. The college seeks to encourage inquiry and reasoned dialogue in a climate of mutual respect. The application of the Equal Opportunity, Non-Discrimination, and Anti-Harassment Policy strives to ensure that we uphold our institutional values and community principles in order to maintain a community free from the harmful consequences of all forms of harassment.¹ Bias, harassment, discrimination, and sexual misconduct threaten our ability to thrive personally, academically, and professionally at Bates by violating a person's rights, dignity, and integrity.² Quite simply, these behaviors run counter to our community principles and the mission of the college.

Bates College is committed to providing a non-discriminatory and harassment-free educational, living and working environment for all members of the Bates community, including students, faculty, administrators, staff, contractors, and visitors. The college maintains policies that promote a community characterized by trust, mutual respect, and responsibility where all can feel secure and free from bias and discrimination in the classroom; social, recreational, and residential environments; and the workplace. All members of the community are expected to adhere to the requirements of the law and this policy, and to the standards of the college community.

The purpose of this policy is to provide the Bates College community with a clearly articulated set of behavioral standards, common understandings of definitions and key concepts, and descriptions and examples of prohibited conduct, including all forms of discrimination, harassment, sexual violence, stalking, and domestic and dating violence. The policy applies to all community members, including students, faculty, staff, contractors, and visitors and is intended to guide students, faculty, and staff who have been affected by harassment or other prohibited behavior, whether as someone who has been the target of such behavior, someone accused of violating this policy, or a third party.

This policy, as set forth, reaffirms Bates' institutional values, defines community expectations, provides recourse for those individuals whose rights have been violated, and provides for fair and equitable

¹ These categories include all of the protected classes listed in section 4 of this policy. Whenever they are used in this policy the terms bias, harassment, and discrimination connote all forms of bias, harassment, and discrimination based on any of these protected classes. The terms, therefore, refer specifically to all forms of racism, sexual harassment (including sexual violence), homophobia, transphobia, discrimination based on shared ancestry (including antisemitism), ableism, ageism, xenophobia, etc.

² Throughout this policy, the bias, harassment, and discrimination will often be used to capture the entire range of prohibited behavior under this policy. When these terms appear, it should be assumed that all forms of racism, sexism, homophobia, transphobia, ageism, and ableism are included.

procedures for determining when this policy has been violated. The college is committed to fostering a climate free from bias, racism, discrimination, harassment, and sexual misconduct through clear and effective policies; a well-coordinated and integrated education and prevention program; and prompt and equitable procedures for the informal and formal resolution of reports. The policy provides individuals reporting potential violations with a spectrum of resolution options, including the option to simply receive supportive measures. This policy prohibits all forms of harassment, discrimination, and sexual misconduct, including discrimination and harassment based upon any protected class, sexual violence, stalking, and all forms of intimate partner violence. The college is dedicated to addressing cases of harassment promptly. Bates values and upholds the equal dignity of all members of the community and strives to support and to balance the rights of all parties involved in the resolution process. Any individual who is found to have violated this policy may face disciplinary sanctions up to and including dismissal from the college or termination of employment.

Bates strongly encourages the prompt reporting of any incident of discrimination, harassment, or sexual misconduct to the college. Upon receipt of a report and in consultation with the individual reporting the incident, the college will take prompt and effective action by: providing support for individuals who make a report or who seek assistance under this policy; conducting a review of the conduct; addressing the safety of individuals and the campus community; and as warranted, pursuing resolution through informal administrative action or formal disciplinary action against an individual accused of violating this policy. This policy outlines specific procedures for the investigation and resolution for all formal complaints.

All Bates community members are strongly encouraged to report information regarding any incident of bias, discrimination, harassment, or sexual misconduct, regardless of whether they wish to pursue a formal complaint. The college is committed to providing programs, activities, and an educational and work environment free from all forms of discrimination, but the college cannot take appropriate action without information about incidents when they occur. By collecting this information about the lived experience of our students, staff, and faculty, we can develop appropriate programming to educate all campus constituencies about effective anti-discrimination strategies and actions. Through this education, we can achieve our institutional mission, foster a community built on trust and mutual respect, and better protect the health, safety, and welfare of all members of the Bates community.

The college expects all members of our community to participate in the process of creating a safe, welcoming, and respectful environment on campus. In particular, the college expects that Bates community members will take reasonable and prudent actions to prevent or stop an act of bias, discrimination, harassment, or sexual misconduct. Taking action may include direct intervention when safe to do so, enlisting the assistance of other individuals, contacting Campus Safety or law enforcement, or seeking assistance from a person in authority. Community members who choose to take these actions will be supported by the college and protected from retaliation.

Retaliation, in any way, shape, or form, against any person or group who makes a good faith report, cooperates with an investigation, or participates in a grievance procedure is a violation of college policy. Retaliation should be reported promptly to the Associate Vice President for Title IX and Civil Rights Compliance/Title IX Coordinator for investigation, which may result in disciplinary action independent of any sanction or interim measures imposed in response to the underlying allegations of discrimination and/or harassment.

Discrimination, harassment, and sexual violence also violate federal and state civil rights laws and may

be subject to criminal prosecution in addition to action taken by the college. Because behavior that violates this policy may also be a violation of law, any individual who has been subjected to harassment or sexual violence is also encouraged to report to local law enforcement and to consider criminal or civil legal options. An individual may also file a complaint with the U.S. Department of Education's Office for Civil Rights, the Equal Employment Opportunity Commission, and/or the Maine Human Rights Commission.

This policy complies with Maine State law and the federal 2020 Title IX Regulations regarding the handling of sexual harassment, as well as other Department of Education Office of Civil Rights regulations and guidance regarding Title IX and/or the handling of other civil rights and equity matters³.

The Associate Vice President for Title IX and Civil Rights Compliance/Title IX Coordinator will review this policy on an annual basis in order to attend to evolving legal requirements and improve the institutional response, including support services and resources and resolution procedures. The college reserves the right to make changes to this document as necessary. All changes will be posted online and take effect immediately upon posting.

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

A change required by a court or government order could occur during an active investigation or resolution process. If that happens, the college reserves the right to adjust the policy and procedures accordingly and notify the Parties of any necessary mid-process changes. This could include entirely replacing the policy, which could necessitate restarting the investigation or resolution process. The college will make every effort to minimize the impact on the Parties as much as possible if changes are unavoidable.

2. Scope of Policy

Bates College denounces bias against, harassment of, and discrimination against any and all individuals or groups. All Bates community members, including students, employees, and volunteers, as well as visitors, are responsible for understanding and complying with this policy.⁴ The college will provide supportive measures as described in this policy to assist individuals in accessing the college's educational program.

This policy provides community members with the structure and guidance to assist those who have been affected by discrimination, harassment, sexual misconduct, or other civil rights violations, whether as a Complainant, a Respondent, or a third party, and to provide fair and equitable procedures for investigation and resolution of reports. The policy may be applied to incidents, to patterns, and/or to the institutional culture/climate, all of which may be addressed in accordance with this policy.

³ This policy addresses Interpersonal Violence as required under Maine law, [An Act Concerning Interpersonal Violence on College Campuses](#).

⁴ For the purposes of the policy, Bates defines "student" as any student who is enrolled in academic coursework, has not fulfilled their degree requirements, and has a continuing relationship with the college. "Employee" refers to all faculty and staff, including members of the administration and instructional staff.

When used in this policy and in alignment with the 2020 federal Title IX regulations, “Complainant” refers to an individual who is a target, victim, or survivor of any alleged conduct prohibited by this policy. “Respondent” refers to an individual who has been accused of prohibited conduct under this policy. “Third party” refers to any other participant in the process, including a witness to the incident or an individual who makes a report on behalf of someone else.

3. Jurisdiction

All Bates community members are responsible for their actions and behavior, and are required to follow college policies and local, state, and federal law. This policy applies to conduct occurring on property owned or controlled by Bates College⁵ or at college-sanctioned events or programs that take place off campus, including, but not limited to, study away, internship programs, community-engaged learning, and athletics events.

In situations in which both the Complainant and Respondent are members of the Bates College community, this policy may apply regardless of the location of the incident. Upon receiving a report, the Associate Vice President for Title IX & Civil Rights Compliance/Title IX Coordinator (hereafter “Title IX Coordinator”) will assess whether the conduct occurred in the context of the college’s educational program and whether it has continuing effects on the Bates community.

In addition, off-campus or online conduct that is likely to have a substantial adverse effect on, or poses a threat of danger to, any member of the Bates College community or Bates College is covered under this policy.

The college may also extend jurisdiction to off-campus and/or to online conduct when the conduct affects a substantial college interest. A substantial college interest includes:

- any action that constitutes a criminal offense as defined by law. This includes, but is not limited to, single or repeat violations of any local, state, or federal law;
- any situation in which it is determined that the Respondent poses an imminent and serious threat to the physical health or safety of any student, employee, or other individual;
- any situation that significantly impinges upon the rights, property, or achievements of others, significantly breaches the peace, and/or causes social disorder; or
- any situation that substantially interferes with the college’s educational interests or mission.

A Complainant is encouraged to report misconduct to the college regardless of where the incident occurred, or who committed it. The college has jurisdiction to take disciplinary action against a Respondent who is a current student or employee. Even if the college does not have jurisdiction over the Respondent, however, the college will take prompt action to provide for the safety and well-being of the Complainant and the broader campus community using available resources. The Title IX Coordinator may be able to assist and/or advocate for a student or employee who experiences discrimination or harassment in an internship, study abroad program, or other external program where policies and procedures of the host organization may give recourse to the Complainant. When criminal

⁵ This provision includes property owned or controlled by recognized student organizations.

conduct is alleged, the Title IX Coordinator will assist the complainant in contacting local law enforcement if the individual would like to file a police report.

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

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

When the Respondent is enrolled in or employed by another institution, the Title IX Coordinator can assist the Complainant in contacting the appropriate individual at that institution, as it may be possible to pursue action under that institution's policies.

This policy provides specific procedures for the resolution of all reports under which the college has jurisdiction. In determining how the college will resolve a report, the Title IX Coordinator strongly considers the preference of the Complainant. Depending on the nature of the allegations, formal complaints will be resolved using either Process A or B outlined in this policy or the procedures outlined in the Employee or Faculty Handbook, as appropriate. The Title IX Coordinator is vested with the authority to determine which process is used.

4. Notice of Non-Discrimination

- A. Policy on Accommodation of Disabilities
- B. Policy on Accommodation of Pregnancy
- C. Role of Associate Vice President Title IX & Civil Rights Compliance/Title IX Coordinator
- D. Roles of Title IX Team & Civil Rights Resolution Team
- E. Contact Information

Bates College is committed to principle of equal opportunity and to providing an educational and work environment free from any discrimination against, harassment of, or retaliation against any member of the college community on the basis of actual or perceived:

- Age (40 years and over in the employment context);
- Ancestry, national or ethnic origin;
- Citizen status;
- Genetic information, including HIV status;
- Physical or mental disability;
- Pregnancy or parental status;
- Primary or native language;
- Marital status;
- Race or color;
- Religion or creed;
- Sex, gender identity, gender expression, or sexual orientation;

- Veteran or military status; and
- other legally protected statuses.

The college is dedicated to ensuring access, fairness, and equity for all persons in its educational programs, related activities, and employment, including those groups who have faced historical barriers to full and fair integration and participation. When brought to the attention of the college, Bates will take corrective action necessary to stop, prevent, and remedy discriminatory, harassing, and retaliatory behavior following the processes and procedures described in this policy. In addition, the college maintains a continuing commitment to identify and eliminate discriminatory practices in every phase of college operations.

4.A. Policy on Accommodation of Disabilities

Bates is committed to ensuring full access to its educational programs and activities for students and employees with disabilities. In compliance with the Americans with Disabilities Act (ADA), Section 504 of the Rehabilitation Act, and the Maine Human Rights Act (MHRA), as well as other federal and state laws and regulations pertaining to individuals with disabilities, the college will work collaboratively to make reasonable accommodations for individuals with documented disabilities. All accommodations are made on an individual basis.

Students seeking accommodations should contact the [Office of Accessible Education and Student Support](#), which coordinates services and support for students, to initiate the process. Employees who wish to request accommodations should contact the [Human Resources Office](#).

The college is committed to providing reasonable accommodations and support to qualified individuals to ensure equal access to the reporting and resolution process. Any person needing accommodations to assist them in reporting alleged violations, seeking support, or to ensure full access to the resolution process should notify the Associate Vice President for Title IX and Civil Rights Compliance, the Director of Accessible Education, or the Human Resources Office.

4.B. Policy on Accommodation of Pregnancy

Bates is committed to ensuring the protection and equal treatment of pregnant individuals, people with pregnancy-related conditions, and new parents. In compliance with Title IX, the Americans with Disabilities Act (ADA), the Pregnancy Discrimination Act, the Maine Act to Protect Pregnant Workers, and the Maine Human Rights Act (MHRA), as well as other federal and state laws and regulations pertaining to pregnancy, the college will work collaboratively to make reasonable accommodations for individuals who are pregnant or experiencing pregnancy-related conditions. All accommodations are made on an individual basis.

Students seeking accommodations may contact the Title IX Coordinator, the [Director of Health Services and Student Well-Being](#), or [Office of Accessible Education and Student Support](#) to initiate the process. Employees who wish to request accommodations should contact the [Human Resources Office](#).

4.C. Role of Associate Vice President for Title IX & Civil Rights Compliance/Title IX Coordinator

The President of Bates College has designated Gwen Lexow, Associate Vice President for Title IX & Civil Rights Compliance, to serve as the college's Title IX Coordinator (hereafter, "Title IX Coordinator"). The Title IX Coordinator oversees the college's compliance with all civil rights laws, including Title IX,

and the implementation of its policies on equal opportunity, non-discrimination, and anti-harassment. As the leader of the Non-Discrimination Team, the Title IX Coordinator has the primary responsibility for the college's centralized review, investigation, and resolution of reports of bias, discrimination, harassment, sexual harassment, retaliation, and other civil rights violations. In addition, the Title IX Coordinator is responsible for overseeing comprehensive non-discrimination education and training and monitoring the effectiveness of this policy and related procedures to ensure an education and employment environment free from discrimination, harassment, and retaliation.

Trained in college policies and procedures and relevant state and federal laws, the Title IX Coordinator is available to meet with any community member who wishes to report a potential violation of this policy or desires more information about this policy, support resources, possible resolution options, or other courses of action at the college and in the community.

The Title IX Coordinator acts with independence and authority free from bias and conflicts of interest.

4.D. Roles of the Deputy Title IX Coordinators and Civil Rights Resolution Team

The Title IX Coordinator is assisted by Deputy Title IX Coordinators in athletics, student affairs, human resources, and the dean of faculty offices. These Deputy Title IX Coordinators have a shared responsibility for supporting the Title IX Coordinator and are accessible to any member of the community for consultation and guidance. This group is referred to as the Non-Discrimination Team.

The Civil Rights Resolution Team works in conjunction with the Non-Discrimination Team and includes individuals involved in the resolution of reports, such as advisors, investigators, hearing officers/decision makers, and appellate officers. Any individual involved in the resolution of complaints under this policy receives specific training designed to assist them with the execution of their role in the resolution process.

All members of the Non-Discrimination and Civil Rights Resolution Teams are vetted and trained to ensure that they are not biased for or against any party in a specific case, or for or against Complainants or Respondents generally. Any concerns regarding bias or potential conflict of interest of a Non-Discrimination or Civil Rights Resolution team member should be brought to the attention of the Title IX Coordinator. Any concerns regarding the Title IX Coordinator should be brought to the attention of a Deputy Coordinator or the President (president@bates.edu or 207-786-6100).

4.E. Contact Information

Reports of potential policy violations or inquiries or complaints concerning the application of this policy may be referred to the Title IX Coordinator or any Deputy Title IX Coordinator.

Associate Vice President for Title IX and Civil Rights Compliance/Title IX Coordinator

Gwen Lexow

Lane Hall 202-A

Phone: 207-786-6445

Email: glexow@bates.edu or titleix@bates.edu

Web: www.bates.edu/here-to-help

Deputy Title IX Coordinator for Athletics

Will Rothermel, Deputy Director of Athletics
Alumni Gym
Phone: 207-786-6342
Email: wrothermel@bates.edu

Deputy Title IX Coordinator for Faculty

Don Dearborn, Associate Dean of Faculty and Professor of Biology
Lane Hall 120
Phone: 207-786-6107
Email: ddearbor@bates.edu

Deputy Title IX Coordinators for Staff and Visitors

Jessica Fournier, Employee Relations Manager
220 College Street
Phone: 207-786-8270
Email: jfournier@bates.edu

Patty Rooney, Assistant Vice President for Human Resources
220 College Street
Phone: 207-753-6935
Email: prooney@bates.edu

Deputy Title IX Coordinator for Students

Andee Bucciarelli, Assistant Dean for Community Standards
Chase Hall, Well-Being Suite
Phone: 207-786-6215
Email: abucciar@bates.edu

Reports or inquiries concerning the application of this policy may also be directed to the following government agencies:

Maine Human Rights Commission

51 State House Station
Augusta ME 04333
Physical address: 19 Union Street, Augusta ME
Phone: 207-624-6290
TTY: Maine Relay 711
Email: Request@mhrc.maine.gov
Web: www.maine.gov/mhrc/

Office for Civil Rights, U.S. Department of Education

400 Maryland Avenue SW
Washington DC 20202-1100
Phone: 800-421-3481
TTY: 800-877-8339

Email: OCR@ed.gov
Web: www.ed.gov/ocr

Employees may also contact:

United States Equal Employment Opportunity Commission

131 M Street NE
Washington DC 20507
Phone: 800-669-4000
TTY: 800-669-6820
ASL Video: 844-234-5122
Email: info@eeoc.gov
Web: www.eeoc.gov

United States Equal Employment Opportunity Commission (Boston Office)

JFK Federal Building
15 New Sudbury Street, Room 475
Boston MA 02203-0506
Phone: 800-669-4000
TTY: 800-669-6820
ASL Video: 844-234-5122

Individuals who participate in activities funded by federal grants (such as NASA, National Institutes of Health [NIH], Department of Justice, etc.) may also report concerns directly to the funding agency.

5. Privacy and Confidentiality

- A. Privacy
- B. Confidentiality
- C. Privilege
- D. Unauthorized Disclosure
- E. Reporting Responsibilities of Employees
- F. Reporting Responsibilities Regarding Minors
- G. Request for Confidentiality
- H. Timely Warning
- I. Release of Information
- J. Student-Athletes and NCAA Information-Sharing Requirements
- K. Recording of Resolution Proceedings
- L. Maintenance of Records

Bates College is committed to protecting the privacy of all individuals involved in any report under this policy. The college will not share the identity of: any individual who has made a complaint of discrimination, harassment, or retaliation; any Complainant; any individual who has been reported to be the perpetrator of discrimination, harassment, or retaliation; any Respondent; or any witness, except as permitted by, or to fulfill the purposes, of applicable laws and regulations (e.g., Title IX), [Family](#)

[Educational Rights and Privacy Act \(FERPA\)](#) and its implementing regulations, or as required by law; including any investigation, or resolution proceeding arising under these policies and procedures.

All college employees who are involved in the college's response, including investigators and hearing officers, receive specific instruction about respecting and safeguarding private information in accordance with state and federal laws. Throughout the process, every effort will be made to protect the privacy interests of all individuals involved in a manner consistent with the need for a thorough review of the report. Such a review is essential to protecting the safety of the Complainant, the Respondent, and the broader campus community and to maintaining an environment free from discrimination and harassment.

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

The privacy of student educational records will be protected in accordance with FERPA, as outlined on the [Bates Registrar's webpage](#). The use of employee records is governed by Human Resources policies outlined in the [Employee Handbook](#), as well as federal and state law. The disclosure of private information contained in medical records is protected by the [Health Insurance Portability and Accountability Act \(HIPAA\)](#).

Privacy and confidentiality have distinct meanings under this policy.

5.A. Privacy

Privacy means that information related to a report made under this policy will only be shared with a limited group of individuals who "need to know" in order to assist in the active review, investigation, or resolution of the report; and the information shared will be limited to the bare minimum necessary. While not bound by confidentiality, these individuals will be discreet, and respect and safeguard the privacy of all individuals involved in the process.

The college reserves the right to contact parents/guardians of students to inform them of situations in which there is a significant and articulable health and/or safety risk. Typically, the college will consult with the student prior to doing so.

Individuals participating in the resolution of a complaint, including the Complainant, the Respondent, all Advisors, and all Witnesses are expected to maintain the privacy of the resolution process. While there is an expectation of privacy around what the Title IX Coordinator, Title IX Team, other college officials involved in the resolution process, and Advisors may share with third parties, the Complainant and Respondent have discretion to share their own knowledge with others if they so choose. The college encourages the parties to discuss the potential impact of these disclosures with their Advisors, prior to doing so.

5.B. Confidentiality

Confidentiality exists in the context of certain protected relationships, particularly among those who provide services such as medical care, mental health counseling and care, legal advice, and pastoral care. Confidentiality also applies to those designated by the college as Confidential Employees for purposes of reports under this policy, regardless of legal or ethical protections. When an individual shares information with a Confidential Employee, the Confidential Employee does not need to disclose that information to the Title IX Coordinator. The Confidential Resource will, however, provide the Complainant with the Title IX Coordinator's contact information, assist the Complainant in reporting, if desired, and provide them with information on how the Office of Title IX and Civil Rights Compliance can assist them. With respect to Confidential Employees, information may be disclosed when: (1) the reporting person gives consent for its disclosure; (2) there is a concern that the person will likely cause serious physical harm to self or others; or (3) the information concerns conduct involving suspected abuse or neglect of a minor under the age of 18, elders, or persons with disabilities.

Non-identifiable information may be shared by Confidential Employees for statistical tracking purposes as required by the Clery Act/Violence Against Women Act (VAWA). Other information may be shared as required by law.

5.C. Privilege

Exists in the context of laws that protect certain relationships, including attorneys, spouses, and clergy. Privilege is maintained by a provider unless a court orders release or the holder of the privilege (e.g., a client, spouse, parishioner) waives the protections of the privilege. The college treats employees who have the ability to have privileged communications as Confidential Employees.

5.D. Unauthorized Disclosure

Parties and Advisors are prohibited from disclosing information obtained by college through the Resolution Process, to the extent that information is the work product of college (meaning it has been produced, compiled, or written by college for purposes of its investigation and resolution of a Complaint), without authorization. It is also a violation of college policy to publicly disclose institutional work product that contains a party or witness's personally identifiable information without authorization or consent. Violation of this Policy is subject to significant sanctions.

5.E. Reporting Responsibilities of Employees

All college employees, other than those who are specifically designated as confidential resources (Confidential Employees) under this policy are required to share with the Title IX Coordinator all knowledge of discrimination, harassment, retaliation, or other prohibited conduct witnessed or shared with them in the course of their employment. This includes student employees with a responsibility for student welfare such as student residence life staff, academic tutors, and Student Academic Support Center staff.

This notification should be done promptly. While individuals must share all known details with the Title IX Coordinator, care should be taken to maintain the Complainant's privacy as much as possible. Upon receipt of this information, the Title IX Coordinator will reach out to the Complainant to offer information regarding supportive measures and formal and informal resolution options.

Generally, disclosures made in climate surveys, academic assignments, IRB-approved human research projects, and speak-outs and rallies (e.g. Take Back the Night or Black Lives Matter events) do not provide notice that must be reported to the Title IX Coordinator by employees, unless the individual clearly indicates that they desire a report to be made or seek a response from the college.

Whenever possible, employees should alert students and co-workers of their obligation to report disclosures, which includes sharing the names of individuals involved and relevant facts regarding the alleged incident (including the date, time, and location), to the Title IX Coordinator prior to the disclosure of any personal information. We suggest faculty include this information on their syllabi.

Failure to report a known incident of harassment or discrimination by a non-confidential employee is a violation of college policy and could be subject to discipline.

5.F. Reporting Responsibilities Regarding Minors

All Bates employees and volunteers who know, suspect, or receive information indicating that a minor has been abused or neglected, or who has other concerns about the safety of a minor, must immediately notify the Title IX Coordinator. Under Maine law, abuse or neglect is a threat to the child's health and welfare by physical, mental or emotional injury or impairment, sexual abuse or exploitation, deprivation of essential needs or lack of protection from these, by a person responsible for the child. In the State of Maine, all educators and administrators are designated as Mandated Reporters and must report any abuse or neglect of a child to the Department of Health and Human Services (DHHS) Office of Children and Family Services (OCFS) or Maine District Attorney's Office. The Title IX Coordinator will assist with this notification. Failure to report potential abuse of a minor may result in disciplinary action up to and including termination.

5.G. Request for Confidentiality

The college will pursue a course of action consistent with the Complainant's request for confidentiality where possible. Where a Complainant requests that their name or other identifiable information not be shared with the Respondent or that no formal action be taken, the college will balance this request with its dual obligation to provide a safe and non-discriminatory environment for all Bates community members and to remain true to principles of fundamental fairness that require notice and an opportunity to respond before disciplinary action is taken against a Respondent.

In making this determination, the college may consider, among other factors, the seriousness of the conduct, the respective ages of the parties, whether the Complainant is a minor under the age of 18, whether there have been other complaints or reports of harassment or misconduct against the Respondent, the existence of independent evidence, and the rights of the Respondent to receive notice and relevant information before disciplinary action is sought. The Title IX Coordinator in consultation with the Non-Discrimination Team will evaluate all requests for confidentiality.

Where the college is unable to take action consistent with the request of the Complainant, the Title IX Coordinator will inform the Complainant about the college's chosen course of action, which may include the college seeking disciplinary action against a Respondent. Alternatively, the course of action may include steps to limit the effects of the alleged harassment and prevent its recurrence that do not involve formal disciplinary action against a Respondent or revealing the identity of the Complainant.

5.H. Timely Warning

If a report discloses a serious, immediate, or continuing threat to the Bates community, the college may issue a campus-wide timely warning or notification (which may take the form of an email, text, or other electronic communication to community members) to protect the health or safety of the community and to heighten safety awareness. A timely warning may be issued for a report of any act of violence, but is particularly likely when the college receives reports of assault, sexual assault, domestic violence, dating violence, and stalking that pose a continuing threat of bodily harm or danger to members of the community. Timely warnings will not include any identifying information about the Complainant.

5.I. Release of Information

All college proceedings are conducted in compliance with the requirements of FERPA, the 2022 Reauthorization of the Violence Against Women Act, the Clery Act, Title IX, state and federal law, and college policy. No information shall be released from such proceedings except as required or permitted by law and college policy.

At no time will the college release the name of a Complainant to the general public without express consent from them. The release of the Respondent's name to the general public is guided by FERPA and the Jeanne Clery Act. The college may share non-identifying information about reports received in aggregate form, including data about outcomes and sanctions.

When the resolution of a complaint results in disciplinary sanctions, the release of information regarding these disciplinary actions will be governed by the [Policy on Reporting Student Disciplinary Matters](#) or as outlined in the [Bates College Employee Handbook](#) as applicable. In all circumstances, any release of information will be in compliance with all applicable state and federal laws.

Anonymous statistical information regarding reports must be shared with Bates Campus Safety where required by the Clery Act. Annual Clery reporting to the U.S. Department of Education is required by all educational institutions. The information contained in the Clery Report only tracks the number of Clery-reportable offenses occurring at campus locations or college-sponsored programs (e.g., study away) and does not include the names or any other identifying information about the person(s) involved in the report. This statistical information is also shared in compliance with Maine state law.

5.J. Student-Athletes and NCAA Information-Sharing Requirements

As part of its commitment to fostering an athletic culture that supports student safety, the NCAA requires all student-athletes to self-disclose any personal conduct that resulted in an investigation or discipline through a Title IX proceeding or in a criminal conviction for sexual, interpersonal, or other acts of violence. Failure to accurately and fully disclose this information could result in penalties, including loss of eligibility to participate in athletics.

In addition, institutions are charged with a) confirming the accuracy of these self-disclosures, b) sharing student-athlete disciplinary information related to these issues with other NCAA institutions in the event a student-athlete wishes to enroll in a different institution, and c) disclosing to the Athletic Department when the institution begins any formal investigation or imposes any disciplinary action related to sexual, interpersonal, or other violence involving a Respondent who is a student-athlete. In all instances, the information shared will be strictly limited to that information necessary to meet these compliance requirements and will not include any information regarding the Complainant.

Student-athletes will receive notice of these requirements through the Athletic Department as part of their annual athletic compliance certification. Students who have questions about this policy may contact the Title IX Coordinator or the Deputy Title IX Coordinator for Athletics.

5.K. Recording of Resolution Proceedings

Bates College policy prohibits unauthorized audio or video recording of any kind. If a Complainant, Respondent, Witness, Advisor, or third-party wishes to record any meeting or interview, they must notify the Title IX Coordinator of that request and receive expressed permission.

The college reserves the right to record all meetings, interviews, and hearings, as necessary, to ensure a compliant and reliable process. All participants will be made aware of audio and/or video recording and how that recording will be used prior to the start of the meeting, interview, or hearing. All recordings will be retained and made available to the parties in accordance with federal and state laws.

5.L. Maintenance of Records

The Title IX Coordinator will be responsible for documenting all reports under this policy and the actions taken to resolve them. These records will be maintained consistent with college records policies and as required by state or federal law.

In compliance with the federal 2020 Title IX Regulations, the college will maintain for a period of at least seven years the following records related to Title IX reports/complaints:

- any actions, including any supportive measures, taken in response to a report or formal complaint of sexual harassment, including:
 - the basis for all conclusions that the response was not deliberately indifferent;
 - any measures designed to restore or preserve equal access to the college's education program or activity; and
 - if no supportive measures were provided to the Complainant, the reasons why such a response was not clearly unreasonable in light of the known circumstances;
- any records related to the Formal Resolution of each sexual harassment allegation, including the investigation report, any determination(s) regarding responsibility, and any audio or audiovisual recording or transcript required under federal regulation;
- any disciplinary sanctions imposed on the Respondent;
- any remedies provided to the Complainant designed to restore or preserve equal access to the college's education program or activity;
- any appeal and the result therefrom;
- any Informal Resolution and the result therefrom; and
- all materials used to train Title IX Coordinator and Deputy Coordinators, Investigators, Hearing Officers, Appellate Officers, and any person who facilitates an Informal Resolution process. These training materials will be publicly available on [Bates College website](#).

6. Online Harassment and Misconduct

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

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

Nothing in this policy is intended to infringe upon or limit a person's rights to free expression. Any online posting or other electronic communication by students, including technology-facilitated bullying, stalking, harassment, etc., occurring completely outside of the college's control (e.g., not on college networks, websites, or between college email accounts) will only be subject to this policy when such online conduct can be shown to cause (or will likely cause) a substantial in-program disruption or infringement on the rights of others. Otherwise, such communications are considered speech protected by the principles of free expression. Supportive measures for Complainants will be provided.

Employees' off-campus speech, whether online or in person, may be regulated by the college only when such speech is made in an employee's official or work-capacity or has substantial disruption to the college's programs or operations.

7. Inclusion Related to Gender Identity and Expression

The college strives to ensure that all individuals are safe, included, and respected in their education and employment environments, regardless of their gender identity or expression. This includes intersex, nonbinary, transgender, agender, two-spirit, and gender-diverse students and employees.

Discrimination and harassment on the basis of gender identity or expression are not tolerated by the college. If a member of the college community believes they have been subjected to discrimination under this policy, they should follow the appropriate reporting process described herein.

In upholding the principles of equity and inclusion, the college supports the full integration and healthy development of those who are gender diverse and seeks to eliminate any stigma related to gender identity and expression.

The college is committed to fostering a climate where all identities are valued, contributing to a more vibrant and diverse community. The college will administratively address issues that some students and employees, including those identifying as intersex, transgender, agender, nonbinary, and gender diverse, may confront as they navigate systems originally designed around the assumption that gender is binary.

8. Prohibited Conduct and Definitions

- A. Discrimination
- B. Harassment
 - 1. Discriminatory Harassment
 - 2. Sexual Harassment (Title IX)
 - 3. Sexual Harassment (Title VII and Fair Housing Act)
- C. Other Prohibited Conduct
 - 1. Sexual Exploitation
 - 2. Interpersonal Violence under Maine Law
 - 3. Physical Assault or Threats of Violence
 - 4. Hazing
 - 5. Bullying
 - 6. Indecent Exposure
 - 7. Retaliation
 - 8. Failure to Comply/Process Interference
- D. Prohibited Relationships by Persons in Authority
- E. Other Campus Code Violations
- F. Hate Crimes and Bias Incidents

All members of the Bates community are entitled to an educational and employment environment free from discrimination, harassment, and bias. The sections below describe prohibited conduct; engaging in such conduct could result in disciplinary action (up to and including dismissal from the college or termination of employment) through the appropriate grievance process described in this policy.

The college recognizes that a robust learning environment often challenges community members to engage in difficult conversations. This policy is not meant to inhibit or prohibit educational content or discussions inside or outside of the classroom that include germane, but controversial or sensitive, subject matters protected by academic freedom and/or the First Amendment.⁶

The sections below describe the specific forms of legally prohibited discrimination, harassment, and retaliation that are also prohibited under college policy. When speech or conduct is protected by academic freedom and/or the First Amendment, it will not be considered a violation of college policy, though supportive measures will be offered to those impacted.

The prohibited behaviors described below encompass actual and/or attempted offenses.

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

⁶ For more information on academic freedom, see Bates Faculty Handbook, Article III. Section 5.

Violations of any other college policies may constitute discrimination or harassment when motivated by actual or perceived protected characteristic(s), and the result is a limitation or denial of employment or educational access, benefits, or opportunities.

For all definitions, “reasonable person” means a reasonable person under similar circumstances and with similar identities to the Complainant.

8.A. Discrimination

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

Disparate Treatment Discrimination: Any intentional differential treatment of a person or persons that is based on a person’s actual or perceived protected characteristic and that:

- excludes a person from participation in;
- denies the person benefits of; or
- otherwise adversely affects a term or condition of a person’s participation in a college program or activity.

8.B. Harassment

8.B.1. Discriminatory Harassment

Discriminatory harassment refers to verbal, written, visual, or physical conduct based on or motivated by an individual’s actual or perceived protected characteristic or activity as described in section 4 of this policy.

Discriminatory harassment is unwelcome conduct or behavior on the basis of actual or perceived protected characteristic(s) that based on the totality of the circumstances, is subjectively and objectively offensive, and is sufficiently severe, pervasive, or persistent that it limits or denies an individual’s ability to participate in or benefit from the college’s education program or activity.

8.B.2. Sexual Harassment (Title IX)

The Department of Education’s Office for Civil Rights (OCR), the Equal Employment Opportunity Commission (EEOC), and the State of Maine regard sexual harassment, a specific form of discriminatory harassment, as an unlawful discriminatory practice.

Acts of Sexual Harassment may be committed by any person upon any other person, regardless of the sex, sexual orientation, and/or gender identity of those involved.

Bates has adopted the following definition of Sexual Harassment to address the unique needs of the academic community. This definition uses plain language to assist individuals in understanding the definitions used in the federal Title IX regulations that all colleges must adopt. All definitions include actual and attempted offenses.

Sexual Harassment, as an umbrella category defined by the federal Title IX regulations, includes the offenses of sexual harassment, sexual assault, domestic violence, dating violence, and stalking.

Sexual Harassment is defined as conduct on the basis of sex or that is sexual in nature that satisfies one or more of the following:

Quid Pro Quo

A Bates employee conditions the provision of aid, benefit, or service of the college on an individual's participation in unwelcome sexual conduct;⁷

Sexual Harassment (Hostile Environment)

Unwelcome conduct of a sexual nature determined by a reasonable person to be so severe, pervasive, and objectively offensive that it effectively denies a person equal access to a Bates education program or activity;

Sexual Assault

Sexual acts committed without the consent of the Complainant, including instances where the complainant is incapable of giving consent because of age or because of temporary or permanent incapacity. There are four subcategories of Sexual Assault.

Penetrative Assault (Rape under Clery Act)

This includes:

- Vaginal or anal penetration, however slight, with a body part (e.g., penis, tongue, finger, hand) or object; or
- Oral penetration involving mouth to genital contact.

Fondling (Criminal Sexual Contact under FBI UCR program)

For the purpose of sexual gratification, sexual degradation, or sexual humiliation:

- The intentional touching of clothed or unclothed parts of the Complainant;
- The Respondent's private body parts touching the Complainant; or
- The Respondent causing the Complainant to touch the Respondent's or their own private body parts.

Incest

⁷ This definition is understood to encompass the quid pro quo sexual harassment definition included in the Maine Human Rights Commission employment regulations. Under these regulations, Quid Pro Quo is defined as having occurred when a) submission to unwelcome sexual conduct is made either explicitly or implicitly a term or condition of an individual's employment; or b) submission to or rejection of unwelcome sexual conduct is used as the basis for employment decisions affecting the individual. Employment Regulations of the Maine Human Rights Commission, Sections 10(1)A and 10(1)B.

Non-forcible sexual intercourse between people who are related to each other within the degrees wherein marriage is prohibited. In the State of Maine, a person may not marry that person's parent, grandparent, child, grandchild, sibling, nephew, niece, aunt, or uncle.

Statutory Rape

Non-forcible sexual intercourse with a person who is under the statutory age of consent. In the State of Maine, consent cannot be given by minors who are 14 or 15, if the actor is at least 5 years older than the minor. Consent cannot be given by minors under 14 years of age, regardless of the age of the Respondent. For this reason, any sexual act with an individual under 14 years of age is considered a felony.

Dating Violence

Violence, on the basis of sex, committed by a Respondent, who is in or has been in a social relationship of a romantic or intimate nature with the Complainant. The existence of such a relationship shall be determined based on the Complainant's statement and with consideration of the length of the relationship, the type of relationship, and the frequency of interaction between the persons involved in the relationship.

For the purposes of this definition, dating violence includes, but is not limited to, sexual or physical abuse or the threat of such abuse. Dating violence does not include acts covered under the definition of domestic violence.

Domestic Violence

Violence, committed by Respondent who is any of the following:

- a current or former spouse or intimate partner of the Complainant;
- a person with whom the Complainant shares a child in common;
- a person who is cohabitating with, or has cohabitated with the Complainant as a spouse or intimate partner;
- a person similarly situated to a spouse of the Complainant under the domestic or family violence laws of the State of Maine; or
- any other person considered a household member under the domestic or family violence laws of the State of Maine.

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

Stalking

A course of conduct by a Respondent, on the basis of sex, directed at a Complainant that would cause a reasonable person to fear for their safety or the safety of others, or suffer substantial emotional distress.

For the purposes of this definition, "course of conduct" means two or more acts, including, but not limited to, acts in which the Respondent directly, indirectly, or through third parties, by any action,

method, device, or means follows, monitors, observes, surveils, threatens, or communicates to or about a person, or interferes with a person's property.

"Substantial emotional distress" means significant mental suffering or anguish that may, but does not necessarily, require medical or other professional treatment or counseling.

8.B.3. Sexual Harassment (Title VII and Fair Housing Act)

This definition applies to situations where an employee is subjected to workplace Sexual Harassment or where a situation involves a Complainant residing in college-owned or provided housing.

This includes: unwelcome verbal, written, graphic, and /or physical conduct on the basis of sex that is severe or pervasive and objectively offensive that unreasonably interferes with, limits, or effectively denies an individual's educational or employment access, benefits, or opportunities.

8.C. Other Prohibited Conduct

Bates also prohibits the following behavior as forms of discrimination. In addition to the forms of sexual harassment described above, which are covered by Title IX of the Education Amendments of 1972, these behaviors may or may not fall within the scope of Title IX.

8.C.1. Sexual Exploitation

Sexual Exploitation occurs when an individual takes non-consensual or abusive sexual advantage of another for one's own advantage or benefit, or to benefit or advantage anyone other than the person being exploited and that does not otherwise constitute Sexual Harassment under this policy.

Examples of sexual exploitation include, but are not limited to:

- surreptitiously observing another individual's nudity or sexual activity or allowing another individual or group to observe consensual sexual activity without the knowledge and consent of all parties involved;
- invasion of sexual privacy (e.g. doxxing);
- non-consensual taking or streaming of authentic or synthetic images, photography, video, or audio recording of sexual activity or nudity, or distribution of such without the knowledge and consent of all parties involved;
- distributing sexually intimate or sexual information about another person;
- knowingly making an unwelcome disclosure of (or threatening to disclose) a person's sexual orientation, gender identity, or gender expression;
- prostituting another person or engaging in sex trafficking;
- inducing another to expose their own genitals in non-consensual circumstances;
- knowingly exposing another individual to a sexually transmitted infection (STI) or virus without their knowledge;
- misappropriating another person's identity on apps, websites, or other venues designed for dating or sexual connections;
- causing or attempting to cause the incapacitation of another person for the purpose of making another person vulnerable to non-consensual sexual activity;
- forcing a person to take an action against that person's will by threatening to show, post, or share information, video, audio, or images that depicts a person's nudity or sexual activity;

- knowingly soliciting a minor for sexual activity;
- creating, possessing, or disseminating child pornography or images or recordings of child sexual abuse;
- creating or disseminating synthetic media, including images, videos, or audio representations of individuals doing or saying sexually-related things that never happened, or placing identifiable real people in fictitious pornographic or nude situations without their consent (i.e., Deepfakes); and
- knowingly assisting another person with committing an act of sexual misconduct.

8.C.2. Interpersonal Violence (under State of Maine Law)

Interpersonal Violence is any conduct defined as Interpersonal Violence under Maine State law that does not otherwise constitute sex-based harassment or sexual exploitation. There are three categories of interpersonal violence that apply.

Intimate Partner Violence

Any of the acts that constitute abuse under [Title 19-A, section 4102](#) that are committed by an individual who is or has been in a social relationship with another individual of an intimate nature regardless of whether the individual were or are sexual partners.

Sexual Violence

Any conduct that constitutes:

- Any crime under Title 17-A, chapter 11 (Sexual Assaults);
- Unauthorized dissemination of certain private images pursuant to Title 17-A, section 511-A;
- Aggravated sex trafficking or sex trafficking pursuant to Title 17-A, section 852 or 853 respectively; or
- Sexual Harassment as defined in Title 14, section 6000, subsection 2-A.77.

Stalking

Any conduct that constitutes the crime of stalking under [Title 17-A, section 210-A](#).

8.C.3. Physical Assault or Threats of Violence

Physical Assault is a purposeful action meant to threaten or endanger the health or safety of any person. Examples include, but are not limited to, fighting, pushing, kicking, punching, hitting with or throwing an object at, or biting. Threats of violence may include extreme verbal, emotional, or psychological abuse, or other conduct which threatens or endangers the health or safety of another person. This behavior is typically treated as a violation of the [Bates Code of Student Conduct](#) and/or the [Employee Handbook](#). When these acts are perpetrated on the basis of actual or perceived membership in a protected class or in conjunction with other potential violations of this policy, the report will be resolved using the procedures outlined in this policy.

8.C.4. Hazing

Hazing is any act or action which does or is likely to endanger the mental or physical health or safety of

any person as it relates to a person's initiation, admission into, or affiliation with any Bates-recognized group or organization.

For the purposes of this definition:

- It is not necessary that a person's initiation or continued membership is contingent upon participation in the activity, or that the activity was sanctioned or approved by the student group or student organization, for an allegation of hazing to be upheld;
- It shall not constitute an excuse or defense to a hazing allegation that the participants took part voluntarily, gave consent to the conduct, voluntarily assumed the risks or hardship of the activity, or that no injury was suffered or sustained;
- The actions of alumni, active, new, and/or prospective members of a student group or student organization may be considered hazing.

8.C.5. Bullying

Bullying is repeated and/or severe aggressive behavior likely to intimidate or intentionally hurt, control, or diminish another person, physically and/or mentally that is not speech or conduct that is otherwise protected by the First Amendment. It can be written or oral expression, physical acts or gestures, or a combination of the two. It includes, but is not limited to, conduct that:

- physically harms another person;
- damages another person's property;
- creates an intimidating educational or work environment; or
- interferes with the individual's academic or work performance or ability to participate in or benefit from the services, activities, or privileges provided by the college.

Bullying includes cyberbullying — bullying that occurs through the use of technology or any electronic communication.

8.C.6. Indecent Exposure

A person commits Indecent Exposure if that person intentionally shows their genitals in a public place or in another place where there are other persons present under circumstances in which one knows or should know that this conduct is likely to affront or alarm.

8.C.7. Retaliation

Retaliation is any material adverse action taken by the college or a member of the Bates community against any individual because the individual:

- made a report or complaint;
- participated in an investigation or hearing;
- assisted in the gathering of evidence; or
- refused to participate in a resolution process under this policy.

Forms of retaliation include intimidation, threats, coercion or discrimination. Retaliation can be committed by the college, a student, employee, or a person authorized by the college to provide aid, benefit, or service under the college's education program or activity, not just a Respondent. Retaliatory conduct interferes with the rights or privileges secured by law or policy.

An individual reporting harassment or discrimination is entitled to protection from any form of retaliation following a report that is made in good faith, even if the underlying allegations are later not proven to be a violation of this policy. Individuals acting in good faith to oppose or disrupt conduct that constitutes a violation of this policy are likewise protected from retaliation.

Any attempt to interfere with or circumvent any right or privilege afforded by this policy may be considered retaliatory. Therefore, as directed by the federal regulations, the Title IX Coordinator vets all complaints carefully to ensure that complaints are routed to the appropriate grievance process and that all appropriate rights and privileges are maintained.

The exercise of rights protected under the First Amendment or free expression does not constitute retaliation.

Charging an individual with a code of conduct violation for making a materially false statement in bad faith in the course of a resolution proceeding under this policy and procedures does not constitute retaliation, provided that the determination of responsibility, by itself, is not sufficient to conclude that any party has made a materially false statement in bad faith.

8.C.8. Failure to Comply/Process Interference

While parties have the right to choose whether they wish to participate in the resolution process, actions that interfere with the process or do not comply with reasonable directives are subject to discipline. These acts include:

- intentional failure to comply with the reasonable directives of the Title IX Coordinator or other college administrator in the performance of their official duties, including with the terms of a no contact order;
- intentional failure to comply with emergency removal or interim suspension terms;
- intentional failure to comply with sanctions;
- intentional failure to adhere to the terms of an Informal Resolution agreement;
- intentional failure to comply with required reporting duties as defined in this policy;
- intentional interference with the resolution process, including but not limited to:
 - destruction of or concealing of evidence;
 - actual or attempted solicitation of knowingly false testimony or providing false testimony or evidence; and
 - intimidating or bribing a witness, party, or any other individual involved in the resolution of the complaint.

8.D. Prohibited Relationships by Persons in Authority

Sexual, romantic, or other intimate relationships in which one party maintains a supervisory or evaluative role over the other party are prohibited. This includes all sexual or other intimate relationships between a student and a college employee. Similarly, college employees (faculty and

staff) who supervise or otherwise hold positions of authority over others are prohibited from having a sexual or other intimate relationship with an individual under their supervision.

The college does not wish to interfere with private choices regarding personal relationships when these relationships do not interfere with the goals and policies of the college. However, faculty, administrators, and others who educate, supervise, evaluate, employ, counsel, coach, or otherwise guide students or other employees should understand the fundamentally asymmetrical nature of the relationship they have with students or subordinates. Intimate or sexual relationships where there is a differential in power or authority produce risks for every member of our community and undermine the professionalism of employees and supervisors. In either context, the unequal position of the parties presents an inherent element of risk and may raise sexual harassment concerns if one person in the relationship has the actual or apparent authority to supervise, evaluate, counsel, coach, or otherwise make decisions or recommendations as to the other person in connection with their employment or education at the college.

Sexual relations between persons occupying asymmetrical positions of power, even when both consent, raise suspicions that the person in authority has violated standards of professional conduct and potentially subject the person in authority to charges of sexual harassment based on changes in the perspective of the individuals as to the consensual nature of the relationship. Similarly, these relationships may impact third parties based on perceived or actual favoritism or special treatment based on the relationship.

Therefore, persons with supervisory or evaluative responsibilities who contemplate beginning or are involved in a relationship with another employee are required to promptly: 1) discontinue any supervising role or relationship over the other person; and 2) report the circumstances to Human Resources or the Title IX Coordinator. Examples of evaluative responsibilities include, but are not limited to: performance evaluations, salary decisions, decisions regarding promotion and tenure, or decisions on continuation of employment for a person with whom they have a consensual relationship. Failure to fully or timely comply with these requirements is a violation of this policy, and the person in authority could be subject to disciplinary action, up to and including dismissal from employment by the college.

All violations, complaints, or concerns regarding this policy should be reported to the Title IX Coordinator.

8.E. Other Campus Code Violations

When other potential violations of the [Bates Code of Student Conduct](#) or the [Employee Conduct Policy](#) occur in conjunction with incidents of harassment or discrimination or when the behavior is perpetrated on the basis of bias against a protected class, the college has the discretion to resolve those violations under this policy.

8.F. Hate Crime and Bias Incidents

The terms **Hate Crime** and **Bias Incident** refer to a range of behaviors that are rooted in intolerance or prejudice based on protected identity characteristics. Since these terms are umbrella terms, incidents will be resolved based upon the actual category of prohibited behavior either listed above (harassment, bullying, etc.) or as defined by the Code of Student or Employee Handbook.

Hate Crime

Hate Crime refers to the violence of intolerance and prejudice, intended to hurt and intimidate, committed against a person, property, or society that is motivated by an offender's bias against a specific characteristic of an individual or group because of their race, ethnicity, national origin, religion, sex, sexual orientation, gender identity, gender expression, age, physical or mental disability. Hate crimes are criminal offenses that include acts such as physical assault, stalking, cyberstalking, criminal threatening, intimidation, terrorizing, criminal use of explosives, arson, vandalism or other damage to property, reckless conduct, harassment, verbal abuse or insults, or hate mail. Several Maine statutes provide civil and/or criminal remedies for hate crimes. All suspected hate crimes will be referred to the State of Maine Office of the Attorney General for their evaluation, investigation, and/or prosecution.

Bias Incident

Bias Incident refers to any event of intolerance or prejudice, not involving violence or other criminal conduct intended to hurt and intimidate, committed against a person, property, or society that is motivated by an offender's bias against a specific characteristic of an individual or group because of their race, ethnicity, national origin, religion, sex, sexual orientation, gender identity, gender expression, age, physical or mental disability. Examples of bias incidents include hate speech, gay bashing, racist epithets, religious slurs, sexist jokes or cartoons, hate mail, offensive graffiti, or disparaging remarks on social media sites. Such incidents create a socially divisive atmosphere for members of the Bates community targeted and negatively affect the campus climate.

9. Consent and Related Definitions

- A. Consent
- B. Force
- C. Coercion
- D. Incapacitation
- E. Impact of Alcohol or Other Drugs

When evaluating whether there has been a violation of this policy, a determination of whether consent has been given is often necessary. Proof of consent or non-consent is not a burden placed on any party involved in an incident. Instead, the burden remains on the college to determine whether consent has been given based on the totality of the circumstances evaluated from the perspective of a reasonable person in the same or similar circumstances, including the context in which the alleged incident occurred and any similar and previous patterns that may be evinced.

When evaluating the presence of consent, the following definitions and understandings apply.

9.A. Consent

Consent consists of an active, conscious, and voluntary decision by each participant to engage in mutually agreed-upon sexual activity.⁸ Consent must exist from the beginning to the end of each sexual

⁸ The definition of consent used in criminal proceedings in the State of Maine differs from that used by the college

activity or each form of sexual contact. An individual who is physically incapacitated by alcohol or other drug consumption (voluntary or involuntary) or is asleep, unconscious, unaware, or otherwise physically helpless is considered unable to give consent.

The following are essential elements of consent:

Informed and reciprocal

All parties must demonstrate a clear and mutual understanding of the nature and scope of the act to which they are consenting and a willingness to do the same thing, at the same time, in the same way.

Freely and actively given

Consent cannot be gained by force, coercion, deception, threats; by ignoring or acting in spite of the objections of another; or by taking advantage of the incapacitation of another individual.

Mutually understandable

Consent consists of mutually understandable words and/or actions that indicate an unambiguous willingness to engage freely in sexual activity. In the absence of clear communication or outward demonstration, there is no consent. A person who does not physically resist or verbally refuse sexual activity is not necessarily giving consent. Consent may not be inferred from silence, passivity, lack of resistance or lack of active response. Relying solely upon non-verbal communication can lead to a misunderstanding or false conclusion as to whether consent was sought or given.

If at any time during the sexual activity, an individual is hesitant, confused, uncertain, or is no longer an enthusiastic participant, both parties should stop and clarify verbally the other's willingness to continue before continuing such activity.

Not indefinite

Either party may withdraw consent at any time. Withdrawal of consent may be expressed by "no" or outwardly demonstrated by words or actions that clearly indicate a desire to end sexual activity. Once consent is withdrawn, sexual activity must cease immediately.

All parties must obtain mutually understandable consent before continuing further sexual activity. Recognizing the dynamic nature of sexual activity, individuals choosing to engage in sexual activity must evaluate consent in an ongoing manner and communicate clearly throughout all stages of sexual activity.

Not unlimited

Consent to one form of sexual contact does not constitute consent to all forms of sexual contact, nor does consent to sexual activity with one person constitute consent to activity with any other person. Each participant in a sexual encounter must consent to each form of sexual contact with each participant.

Individuals with a previous or current intimate relationship do not automatically give either initial or continued consent to sexual activity. Even in the context of a relationship, consent must be based on mutually understandable communication that clearly indicates a willingness to engage in sexual activity

to address policy violations.

each time such activity occurs. The mere fact that there has been prior intimacy or sexual activity does not, by itself, imply consent to future acts.

In the State of Maine, consent cannot be given by minors who are 14 or 15, if the actor is at least 5 years older than the minor. Consent cannot be given by minors under 14 years of age, regardless of the age of the Respondent. For this reason, any sexual act with an individual under 14 is considered a felony.

9.B. Force

Force is the use or threat of physical violence and/or intimidation to overcome an individual's freedom of will to choose whether or not to participate in sexual activity. Such action would cause a person to fear for their physical or psychological well-being. For the use of force to be demonstrated, there is no requirement that a Complainant resists the sexual advance or request. However, resistance by the Complainant will be viewed as a clear demonstration of non-consent.

9.C. Coercion

Coercion is the use of unreasonable pressure that compels another individual to initiate or continue sexual activity against their will. Coercion can include a wide range of behaviors, including intimidation, manipulation, implied threats or blackmail which places a person in fear of immediate harm or physical injury or causes a person to engage in unwelcome sexual activity. A person's words or conduct are sufficient to constitute coercion if they wrongfully impair another individual's freedom of will and ability to choose whether or not to engage in sexual activity. Examples of coercion include, but are not limited to:

- threatening to "out" someone based on sexual orientation, gender identity, or gender expression;
- persistent attempts to pressure an individual who has clearly stated their desire to stop activity or their unwillingness to engage in a certain sexual act; and
- threatening to harm oneself or others if the other party does not engage in the sexual activity.

Coercing an individual into engaging in sexual activity violates this policy in the same way as physically forcing someone into engaging in sexual activity.

9.D. Incapacitation

Incapacitation is a state where an individual is incapable of giving consent. An incapacitated person cannot make an informed and rational decision to engage in sexual activity because they lack the capacity to give knowing/informed consent (e.g., to understand the who, what, when, where, why, or how of the sexual interaction).

A person cannot consent if they are unable to understand what is happening or are disoriented, helpless, asleep, or unconscious for any reason, including as a result of alcohol or other drug consumption.

This policy also covers a person whose incapacity results from a temporary or permanent physical or mental health condition, involuntary physical restraint, and/or the consumption of incapacitating substances.

Incapacitation is determined through consideration of all relevant indicators of a person's state and is not synonymous with intoxication, impairment, blackout, and/or being drunk. Consumption of alcohol or other drugs alone is insufficient to establish incapacitation. The impact of alcohol and drugs varies from person to person; however, warning signs that a person may be approaching incapacitation include slurred speech, vomiting, unsteady gait, odor of alcohol, combativeness, loss of consciousness, or emotional volatility.

Evaluating incapacitation due to the use of substances requires an assessment of how the consumption of alcohol and/or drugs affects an individual's:

- decision-making ability;
- awareness of consequences;
- ability to make informed judgments; or
- capacity to appreciate the nature and the quality of the act.

Evaluating incapacitation also requires an assessment of whether the Respondent should have been aware of the Complainant's incapacitation based on objectively and reasonably apparent indications of impairment when viewed from the perspective of a reasonable person. If the Respondent neither knew nor should have known the Complainant to be physically or mentally incapacitated, the Respondent is not in violation of the policy.

9.E. Impact of Alcohol or Other Drugs

In general, sexual contact while under the influence of alcohol or other drugs poses a risk to all parties. Alcohol and drugs impair a person's decision-making capacity, awareness of the consequences, and ability to make informed judgments. It is especially important, therefore, that anyone engaging in sexual activity be aware of their own and the other person's level of intoxication. If there is any doubt as to the level or extent of the other individual's intoxication or impairment, the prudent course of action is to forgo or cease any sexual contact or activity.

Being intoxicated or impaired by drugs or alcohol is never an excuse for any prohibited behavior under this policy and does not diminish one's responsibility for obtaining informed and freely given consent or adhering to the behavioral standards outlined in this policy.

10. Resources

- A. Awareness and Prevention of Bias, Harassment, and Discrimination
- B. Emergency Support and Response Services
- C. Medical Resources
- D. Confidential Support
 - 1. On Campus Confidential Support (Confidential Employees)
 - 2. Off Campus Confidential Support
- E. Private Resources
- F. Additional Community Resources

Bates is committed to treating all members of the community with dignity, care, and respect. Any Bates community member who experiences or is affected by bias, discrimination, harassment, including racism, homophobia, transphobia, Islamophobia, antisemitism, sexual harassment, sexual violence,

stalking or intimate partner violence, whether as a Complainant, a Respondent, or a third party, will have equal access to support and counseling services through the college.⁹ Supportive measures as described in section 12 are available to all parties. A formal complaint is not required to access this support.

The college recognizes that deciding whether to make a report, either to the college or law enforcement, and choosing how to proceed can be difficult decisions. The college encourages all individuals affected by any form of harassment or discrimination to seek the support of campus and community resources. These professionals can provide guidance in making decisions, information about available resources and procedural options, and assistance to any party in the event that a complaint and/or resolution under this policy is pursued. Individuals are encouraged to use all available resources on and off campus, regardless of when or where the incident occurred.

Bates is committed to providing a comprehensive and integrated prevention, education, and awareness program that attends to the multifaceted dynamics of bias, discrimination, and harassment. The college strives to create a non-discriminatory and harassment-free living, learning, and working environment for all members of the Bates community, including students, staff, faculty, and visitors. The Vice President for Equity and Inclusion (VPEI) coordinates all college equity and inclusion education and prevention programs and develops initiatives to respond to campus needs and climate. The Associate Vice President for Title IX & Civil Rights Compliance/Title IX Coordinator (Title IX Coordinator) collaborates with stakeholders across campus to provide education, prevention programming, and other initiatives related to sexual harassment and other discrimination based on sex and/or gender.

10.A. Awareness and Prevention of Bias, Discrimination, and Harassment

All incoming students and new employees will receive primary prevention and awareness programming as part of their orientation and onboarding. Returning students and employees receive ongoing training and education.

Educational, developmental, and responsive programs that address bias, harassment, and discrimination based on identity are facilitated by the Office of Equity and Inclusion, the Office of Title IX and Civil Rights Compliance, the Student Center for Belonging and Community, Student Affairs, and Human Resources as appropriate.

Educational programs focused on sexual harassment include an overview of the college's policies and procedures, relevant definitions of prohibited conduct, discussion of the impact of alcohol and illegal drug use, effective consent, safe and positive options for bystander intervention, and information about risk reduction. The Title IX Coordinator oversees the education and prevention calendar and tailors programming to campus needs and climate. All educational programs include a review of resources and reporting options available for students, faculty, and staff.

10.B. Emergency Support and Response Services

Bates encourages all community members to seek assistance from a medical provider and/or law enforcement as soon as possible after an incident of violence, including sexual violence. This often is the best option to provide immediate physical safety, emotional support, and medical care. It also may

⁹ Hereafter in this section the umbrella terms "discrimination" and "harassment" will be used to capture all of these categories.

help to ensure preservation of evidence and to begin a timely investigative and remedial response. The college will escort any Bates community member to a safe place, provide transportation to the hospital, assist in coordination with law enforcement, and provide information about the college's resources and reporting processes.

Assistance is available from Bates Campus Safety and local law enforcement 24 hours a day, year-round, by calling Bates Campus Safety and/or the Lewiston Police Department. Any individual can request that a member of Bates Campus Safety and/or Lewiston Police Department respond and take a report. An officer from the Lewiston Police Department can meet with a student or employee on campus at whatever location they are most comfortable. Bates Campus Safety will provide transportation upon request to a medical center or the police department.

More detailed information about filing a criminal complaint can be found on the [Bates Here to Help webpage](#).

Contact Information for Emergency Response Services

- **911**

- **Bates Campus Safety**
245 College Street
Phone: 207-786-6111 (emergency) or 207-786-6254 (non-emergency)

- **Lewiston Police Department**
141 Mill Street
Lewiston ME
Phone: 207-784-6421
Web: www.lewistonmaine.gov/141/Welcome

10.C. Medical Resources

A medical provider can provide emergency and/or follow-up medical services. The medical exam has two goals: first, to diagnose and treat the full extent of any injury or physical effect and second, to properly collect and preserve evidence.

In cases of sexual violence, the forensic exam may include testing and prophylactic treatment for HIV/AIDS, STIs, and pregnancy; a thorough physical examination, which includes the genital and/or anal area; and a blood draw. There is a limited window of time (typically 72-96 hours) following an incident of sexual assault to preserve physical and other forms of evidence. Taking the step to gather evidence immediately does not commit an individual to any particular course of action. The decision to seek timely medical attention and gather any evidence, however, will preserve the full range of options to seek resolution under this policy or through the pursuit of criminal prosecution. Filing a report with local law enforcement is not required to get a forensic exam. More detailed information regarding Sexual Assault Forensic Exams can be found on the [Bates Here to Help webpage](#). Individuals seeking medical care may be eligible for assistance with the costs associated with that care through the [Victim's Compensation Fund](#).

On campus, [Bates Health Services \(BHS\)](#) can provide medical care to students during regular business hours. While a nurse is available to talk with anyone who has questions about forensic examinations, BHS is not equipped to perform forensic examinations. The Complainant has the option — and is encouraged — to go to [Central Maine Medical Center](#) (CMMC) or [St. Mary's Regional Medical Center](#) for care and to have evidence collected. Bates Campus Safety will provide transportation upon request to CMMC or St. Mary's.

[Lewiston Family Planning](#) can also provide routine and on-going medical care. As part of the Maine Family Planning network, this clinic provides specialized care for sexual and reproductive health to individuals of all genders. Lewiston Family Planning employs providers who specialize in transgender health services as well.

An advocate from [Sexual Assault Prevention and Response Services](#) (SAPARS) or Safe Voices can accompany individuals to off-campus resources.

Conversations with health care professionals are confidential and governed by [Health Insurance Portability and Accountability Act \(HIPAA\)](#).

Contact Information for Medical Services

Bates Health Services

31 Campus Avenue

207-786-6199

www.bates.edu/health-services

9am–5pm Monday–Friday during academic year

Treatment of injuries, emergency contraception, and STI testing and treatment.

Central Maine Medical Center (CMMC)

300 Main Street, Lewiston, Maine

207-795-2200

www.cmhc.org/cmmc

24-hour Emergency Department. Treatment of injuries, emergency contraception, and STI testing and treatment. Sexual Assault Forensic Examiners are available to provide forensic exams and collect physical evidence for future use.

St. Mary's Regional Health Center

91 Campus Avenue

Lewiston ME

Phone: 207-777-8120

Web: www.stmarysmaine.com

24-hour Emergency Department. Treatment of injuries, emergency contraception, and STI testing and treatment. Sexual Assault Forensic Examiners are available to provide forensic exams and collect physical evidence for future use.

Lewiston Family Planning

179 Lisbon Street

Lewiston ME

Phone: 207-795-4007

Web: www.mainefamilyplanning.org

Limited hours Monday, Wednesday, Thursday, and Friday

Provide specialized care for sexual and reproductive health to individuals of all genders, including transgender health services.

10.D. Confidential Support

While Bates encourages all community members to make a prompt report of any incident of bias, harassment, or discrimination, including racism, homophobia, transphobia, and sexual harassment or violence, to the college or local law enforcement, the college understands that deciding whether or not to file a report can be difficult. For individuals who are not prepared to make a report, or who may be unsure what happened, but are still seeking information and support, there are several confidential resources on campus and in the local community, including counseling and support services.

Individuals affected by any type of discrimination or harassment may want to consult with someone in a confidential manner without making a report to the college or filing an official complaint. The trained professionals listed in this section are designated as confidential and may not share information about a patient/client (including whether or not that individual has received services) without the individual's expressed consent unless there is imminent danger to the patient/client or other community members, or as otherwise required by law. They may, however, submit non-identifying information about the incident for the purposes of making a statistical report under the Clery Act, as described in section 5.

10.D.1. On-Campus Confidential Support

Bates Counseling and Psychological Services

31 Campus Avenue

Phone: 207-786-6200

Email: caps@bates.edu

Web: www.bates.edu/counseling-psychological-services

Provides comprehensive mental health care, including both crisis and therapeutic counseling for students.

Bates Health Services

31 Campus Ave

Phone: 207-786-6199

Email: healthservices@bates.edu

Web: www.bates.edu/health-services

Provides medical services. Director can answer any questions related to accessing medical care, resources on campus, care coordination, health insurance, and managing your medical needs as a college student.

Bates Ombuds Program

Web: www.bates.edu/hr/ombuds

Provides assistance to staff and faculty seeking appropriate paths to resolving workplace concerns, including a review of options for informal resolutions. *Please note while Ombuds are confidential under college policies, they do not have legal privilege and, therefore, may be required to disclose information shared with them in civil or criminal legal proceedings.

Confidential Resource Advisor (CRA)

previously known as Sexual Assault Victim Advocate (SAVA)

Chase Hall

Phone: 207-753-6996

Email: cra@bates.edu

Web: www.bates.edu/here-to-help/cra

Provides information, advocacy, and support to anyone affected by harassment, discrimination, interpersonal violence, sexual harassment, sexual violence, or stalking. Can assist with navigating local medical and legal systems and provide guidance on safety planning.

Multifaith Chaplain

Rob Benson

163 Wood Street, 2nd Floor

Phone: 207-786-6125

Email: rbenson@bates.edu

Web: www.bates.edu/multifaith

Provides individualized emotional and spiritual support through pastoral care and conversation.

Sports Medicine Staff

Team physicians and Certified Athletic Trainers

Athletic Training Rooms at Merrill Gym, Alumni Gym, and Underhill Arena

Web and contact: www.gobatesbobcats.com/sports/2020/6/4/spmeds-athletic-performance-sports-medicine-staff.aspx

Provides comprehensive sports medicine health care, referrals to other providers and to support resources.

Director of the Student Center for Belonging and Community

Tonya Bailey

Chase Hall, SCBC, Room 146

Phone: 207-755-5934

Email: tbaileyc@bates.edu

Web: www.bates.edu/student-center-belonging-community

Provides individualized support through conversation. *Please note that while Tonya Bailey is confidential under college policies, she does not have legal privilege and, therefore, may be required to disclose information shared with her in civil or criminal legal proceedings.*

10.D.2. Off-Campus Confidential Support**State and Local Resources****Employee Assistance Program (EAP) — Aetna Resources for Living**

Phone: 888-238-6232

Web: www.resourcesforliving.com — User ID: 4bates; ID: bwell

Web: www.bates.edu/hr/benefits/employee-assistance-program

Provides free, confidential counseling services to Bates employees to help address a variety of

personal issues. Staffed 24/7 by qualified mental health professionals available to listen to concerns and make referrals to a local provider for in person counseling or to resources in your community.

Immigrant Resource Center of Maine

265 Lisbon Street, Suite 2, Lewiston ME

Phone: 207-753-0061

Web: www.facebook.com/ircofmaine

Provides culturally and linguistically sensitive services to the refugee and New Mainer communities, including interpreter services; domestic violence, sexual assault, and trafficking support and advocacy; and system advocacy.

Maine Coalition Against Sexual Assault

Phone: 800-871-7741 (24-hour hotline)

Web: www.mecasa.org

Statewide coalition of sexual assault victim service providers. Access to advocates via hotline or online chat or text.

Maine Coalition to End Domestic Violence

Phone: 866-834-HELP (24-hour hotline)

Web: www.mcedv.org

A confidential statewide hotline for survivors of domestic abuse and violence staffed by trained professionals and volunteers.

Safe Voices

Phone: 800-559-2927 (24-hour helpline)

Web: www.safevoices.org

A confidential domestic violence helpline staffed by trained, caring and confidential advocates. Provides individual support, legal advocacy, support groups, and shelter for survivors of interpersonal violence. Located in Lewiston.

Sexual Assault Prevention and Response Services (SAPARS)

Phone: 800-871-7741 (24-hour helpline)

Web: www.sapars.org

A confidential sexual assault helpline staffed by trained, caring and confidential advocates. An advocate can meet with an individual at the Bates Health Services or other campus location, escort or meet an individual at the hospital, assist someone filing a police report, or help navigate the legal system. Located in Lewiston.

Lewiston Crisis Center

1155 Lisbon Street, Lewiston

Phone: 207-535-2016

Web: spurwink.org/lcc

24/7 walk-in center providing local, confidential mental-health care from licensed professionals. Providing trauma-informed, integrated services that promote whole health and wellness.

Wabanaki Women's Coalition

Web: www.wabanakiwomenscoalition.org

Provides contact and services information for domestic violence, sexual assault and sex trafficking advocacy organizations for all five Wabanaki tribes.

National Helplines

1in6

Web: 1in6.org

A free and anonymous 24-hour online helpline for male-identified people who've experienced sexual abuse or assault and for those who care about them.

FORGE

Web: forge-forward.org

Online resources for transgender and gender non-conforming survivors of violence and their allies, including assistance with referrals to local therapists who specialize in working with transgender individuals.

National Domestic Violence Hotline

Phone: 800-799-7233 (24-hour helpline)

Web: www.thehotline.org

A confidential domestic violence hotline staffed by highly-trained advocates available to talk confidentially with anyone experiencing domestic violence, seeking resources or information, or questioning unhealthy aspects of their relationship.

Rape, Abuse, Incest National Network (RAINN)

Phone: 800-656-4673(24-hour helpline)

Web: rainn.org

The nation's largest anti-sexual violence organization. Free, confidential support via its national sexual assault hotline. Advocates are available via hotline or the chat function on their website.

The Stalking Prevention, Awareness, and Resource Center (SPARC)

www.stalkingawareness.org/what-to-do-if-you-are-being-stalked/

Provides online resources to victims of stalking, including information about how to connect to victim services and safety planning.

10.E. Private Resources

10.E.1. On-Campus Resources

In addition to the confidential resources listed above, Bates community members have access to members of the Non-Discrimination Team (Title IX Coordinator and Deputy Coordinators) who serve as private resources provided by the college. Members of this team can a) provide information regarding the college's policies and procedures; b) assist in accessing other support services; and c) help arrange for supportive measures or other remedies. While not bound by confidentiality, these individuals will maintain the privacy of an individual's information within the limited circle of those who need to know to assist with providing support services or resolving a report.

These professionals have robust training to support individuals affected by bias, discrimination, and harassment based on any measure of identity, including racism, shared ancestry, homophobia, sexual harassment, and sexual violence, and to coordinate with the Title IX Coordinator consistent with the college's commitment to a safe and healthy educational and work environment.

Contact information for these individuals can be found in section 4.

10.F. Additional Community Resources

Students, faculty, and staff members may also access additional off campus resources for assistance in working with the civil or criminal justice system. Off-campus resources will not notify the college of their report without the Complainant's consent.

American Civil Liberties Union of Maine

Phone: 207-774-5444

Web: www.aclumaine.org

Maine affiliate of the national civil liberties organization. Provides information, advocacy, and legal representation for those seeking to understand or secure their civil rights. Priority issues include criminal justice reform, reproductive freedom, racial justice, immigrants' rights, LGBTQ rights, women's rights, voting rights, freedom of expression, freedom of speech and religion, and privacy.

Androscoggin County District Attorney

Androscoggin County Courthouse

2 Turner Street, Auburn ME

Phone: 207-783-7311

Web: www.androscoggincountymaine.gov/158/District-Attorney

Responsible for the prosecution of criminal complaints in Androscoggin County.

Maine Crime Victims' Compensation Program

Office of the Attorney General

6 State House Station

Augusta ME 04333

Phone: 207-624-7882 or 800-903-7882

Web: www.maine.gov/ag/crime-victims/victims-compensation

State program offering financial assistance for victims of violent crimes occurring in Maine, including paying cost for sexual assault forensic examination.

11. Reporting

A. Key Reporting Definitions

1. Report
2. Notice
3. Formal Complaint

B. Reporting to and Coordination with Law Enforcement

C. Campus Reporting Options

D. Anonymous Reporting

E. Reporting Considerations

- 1. Timeliness of Report
- 2. Location of Incident
- F. Student Amnesty for Alcohol or Other Drug Use
- G. False Allegations and Evidence
- H. Counterclaims
- I. Reports involving Minors or Suspected Child Abuse
- J. Reluctance by Complainant to Pursue Resolution
- K. Withdrawal of Complaint

The college is committed to providing a variety of accessible means of reporting any form of bias, discrimination, or harassment, including racism, homophobia, transphobia, sexual harassment, or sexual violence and other sexual misconduct.¹⁰

Our goals are to reduce barriers to reporting and to simplify the reporting process as much as possible. By providing a variety of reporting options, individuals wishing to report an incident can use whatever reporting mechanism that is most comfortable and convenient for them. All Bates community members, even those who are not obligated by the college's policy, are strongly encouraged to report information regarding any incident of bias, discrimination, or harassment to the Associate Vice President for Title IX and Civil Rights Compliance/Title IX Coordinator (hereafter "Title IX Coordinator"), who is specifically charged with coordinating the initial assessment, investigation, and response to such allegations.

At the time a report is made, a Complainant does not have to decide whether or not to request a formal resolution process. Choosing to make a report and deciding how to proceed after making the report can be a process that occurs over time. To the fullest extent possible, the college will respect an individual's autonomy in making these decisions and provide support that will assist each individual in making that determination.

Whenever possible the Title IX Coordinator will defer to the wishes of the Complainant. In the rare situations where the college must act to provide for the safety of the community and/or to fulfill its obligation to foster a harassment-free working and learning environment, the Title IX Coordinator will communicate this decision with the Complainant.

Any individual who reports discrimination or harassment can be assured that all reports will be investigated and resolved in a fair and impartial manner. All individuals involved can expect to be treated with dignity and respect. In every report under this policy, the college will make an immediate assessment of any risk of harm to the Complainant or to the broader campus community and will take steps necessary to address those risks. These steps may include temporary supportive measures to provide for the safety of the Complainant or others involved and the campus community as necessary. In this process, the college will balance the Complainant's interests with its obligation to provide a safe and non-discriminatory environment for all members of the college community.

¹⁰ Throughout the remainder of this section, the terms "harassment" and "discrimination" are used as umbrella terms to capture all forms of bias, harassment, and discrimination, including those specifically named here.

11.A. Key Reporting Definitions

While many individuals conflate the terms “report,” “complaint,” and “notice,” these terms have very specific meanings under this policy.

11.A.1. Report

Report is an umbrella term used to indicate a Complainant or third-party has shared allegations of bias, harassment, discrimination, or retaliation by either informing any Bates employee with reporting responsibilities in conversation or writing, via phone (including leaving a voicemail message) or electronic means (email, text, chat, etc.) or by using the online anonymous reporting system.

Employees with reporting responsibilities are required to share any information of which they become aware with the Title IX Coordinator. For more information on employees who are required to report disclosures of prohibited behavior under this policy and the information they must share, please see section 5.E.

Reports differ from formal complaints (see below) and individuals who submit reports are under no obligation to initiate a formal complaint or to pursue any further action. Except in rare circumstances involving a compelling threat to the health and/or safety of the Complainant or the broader Bates community, the Complainant maintains significant influence on how the resolution process proceeds. Making a report simply initiates outreach from the Title IX Coordinator and allows them to offer supportive measures and further information regarding the Complainant’s rights under this policy.

11.A.2. Notice

Notice means that a Complainant or third-party has informed the Title IX Coordinator, any Deputy Title IX Coordinator, or other Official with Authority of the alleged occurrence of bias, harassment, discrimination, or retaliation. Upon receiving notice, the Title IX Coordinator or their designee will reach out to the Complainant to offer supportive and safety measures and to explain how to file a formal complaint. When the college receives notice of allegations of Title IX Sexual Harassment or any other Title IX violation, its official obligations under Title IX are initiated.

Other Officials with Authority include the following individuals: any member of Campus Safety; President; Vice President for Academic Affairs; Vice President for College Advancement; Vice President for Communications and Public Affairs; Vice President for Enrollment; Vice President for Equity and Inclusion; Vice President for Finance and Administration; Vice President for Information and Library Services; Vice President for Institutional Affairs; Vice President for Student Affairs; Assistant Vice President for Human Resources; Dean of Students; any Senior Associate Dean of Students; Director of Athletics; and Assistant Dean for Community Standards.

11.A.3. Formal Complaint

A formal complaint is an official document filed by the Complainant, or in rare circumstances by the Title IX Coordinator, that: 1) alleges either bias, harassment, or discrimination based on any protected class or retaliation for engaging in a protected activity; and 2) requests that the college investigate the allegation(s). A complaint may be filed with the Title IX Coordinator in person, by mail, or by electronic means. The Title IX Coordinator will assist any individual who wishes to submit a formal complaint to ensure it is filed correctly.

11.B. Campus Reporting Options

The college encourages all individuals to report all forms of bias, discrimination, and harassment to the Associate Vice President for Title IX & Civil Rights Compliance/Title IX Coordinator or any member of the Non-Discrimination Team. These professionals are trained to receive reports; to support individuals affected by bias, discrimination, and harassment based on any measure of identity, including racism, antisemitism or Islamophobia, homophobia, transphobia, sexual harassment, and sexual violence, and to coordinate with the Title IX Coordinator consistent with the college's commitment to a safe and healthy educational and work environment.

Reports can be made in person, via telephone, mail, or email, or using the online anonymous reporting system. Upon receipt of any report, including third-party reports, the Title IX Coordinator, or their designee, will contact the Complainant to offer supportive measures and to provide information on how to file a formal complaint.

Individuals may also contact Campus Safety to file a report.

Contact information for the Non-Discrimination Team can be found in section 4.E.

11.C. Reporting to and Coordination with Law Enforcement

The college encourages individuals to pursue criminal action for incidents of discrimination or harassment that may also be crimes under federal or Maine criminal statutes. The college will assist a Complainant, at the Complainant's request, in contacting local law enforcement and will cooperate with law enforcement agencies if a Complainant decides to pursue the criminal process to the extent permitted by law. Except where the Complainant is less than 18 years old, the college will respect a Complainant's choice whether or not to report an incident to local law enforcement, unless the college determines that there is an overriding issue with respect to the safety or welfare of the college community. When a report involves suspected abuse of a minor under the age of 18, the college is required by state law to notify the Maine Office of Child and Family Services and/or the Maine District Attorney's office.

The college's policy, definitions, and standard of proof can differ from Maine criminal law. A Complainant may seek resolution through the college's resolution process, may pursue criminal action, may choose one but not the other, or may choose both. Neither law enforcement's decision whether or not to prosecute a Respondent nor the outcome of any criminal prosecution are determinative of whether discrimination or harassment has occurred under this policy. Proceedings under the college's Equal Opportunity, Non-Discrimination, and Anti-Harassment Policy may be carried out prior to, simultaneously with, or following civil or criminal proceedings off campus. Individuals seeking assistance under Bates's policy are not required to file a criminal complaint.

At the request of local law enforcement, the college may agree to defer for a short time its own fact gathering until after the initial stages of a criminal investigation. The college will nevertheless communicate with the Complainant regarding rights under this policy, procedural options, and the implementation of supportive measures to foster their safety and well-being. The college will promptly resume its own fact gathering as soon as it is informed that law enforcement has completed its initial investigation.

Individuals wishing to file a criminal complaint for incidents of discrimination or harassment that occurred on campus may contact the Lewiston Police Department directly. Individuals may also contact

the Title IX Coordinator, the Confidential Resource Advisor, Bates Campus Safety, Sexual Assault Prevention & Response Services, or Safe Voices for assistance with filing a criminal complaint.

Lewiston Police Department

141 Mill Street, Lewiston

Emergency: 911

Non-emergency dispatch: 207-784-6421

Maine State Police

Emergency: 911

Phone: 207-624-7076

Web: www.maine.gov/dps/msp/

Federal Bureau of Investigation

Boston Field Office

Phone: 857-386-2000

Web: www.fbi.gov/contact-us/field-offices/boston

11.D. Anonymous Reporting

Any individual may make an anonymous report of behaviors prohibited by this policy. In doing so, an individual may report the incident:

- without disclosing their own name;
- without identifying the Respondent; and/or
- while requesting that no action be taken.

Depending on the extent of information available about the incident and the individuals involved, however, the college's ability to respond to an anonymous report may be limited. Wherever possible, the college will take action to stop any harassing or discriminatory behavior, to prevent its recurrence, and to provide supportive measures and/or remedies to those who have been negatively affected.

The college's anonymous reporting system is hosted by a third-party provider, [EthicsPoint](https://ethicspoint.com/). This service allows the college to communicate with the person making the report, while maintaining their anonymity. EthicsPoint stores all information regarding these reports on their secure servers. Information collected by EthicsPoint is subject to their data security and [privacy policies](#).

The Title IX Coordinator will receive the information contained in the anonymous report and will determine any appropriate response or action, including individual or community remedies as appropriate. In consultation with the Director of Campus Safety, the Title IX Coordinator will determine if the anonymous report provides sufficient information to submit a Clery crime report.

To report anonymously online: bates.ethicspoint.com

To report anonymously by phone: 844-251-1879

EthicsPoint is NOT a 911 or Emergency Service: If you require immediate or emergency assistance, please contact the Bates Campus Safety at 207-786-6111 or dial 911.

11.E. Reporting Considerations

11.E.1. Timeliness of Report

All community members are encouraged to report harassment and discrimination as soon as possible in order to maximize the college's ability to respond promptly and effectively. The college does not, however, limit the time frame for reporting. If the Respondent is no longer a student or employee or is not a member of the Bates community, the college may not be able to take disciplinary action against the Respondent; but the college will take all reasonable steps to provide support to the Complainant and to end the harassment, prevent its recurrence, and address its effects.

Acting on complaints significantly impacted by the passage of time (including, but not limited to, the rescission or revision of policy) is at the Title IX Coordinator's discretion; they may document allegations for future reference, offer supportive measures and/or remedies, and/or engage in informal or formal action, as appropriate. When there is a significant delay between the occurrence of the alleged incident and the resolution of a report of it, the college typically will apply the policy in place at the time of the incident and the procedures in place at the time of resolution.

11.E.2. Location of Incident

An incident does not have to occur on campus to be reported to the college. All college community members are responsible for their actions and behavior, whether the conduct in question occurs on campus or in another location. Members of the college community have a responsibility to adhere to college policies and local, state, and federal law. As a result, this policy applies both to on-campus and off-campus conduct as described in Section 3. In particular, off-campus conduct that is likely to have a substantial adverse effect on any member of the college community or Bates College may be addressed under this policy.

11.F. Student Amnesty for Alcohol or Other Drug Use

The college seeks to remove any barriers to reporting misconduct by Complainants and witnesses. Sometimes, Complainants or witnesses are hesitant to report to college officials or participate in resolution processes because they fear that they themselves may be in violation of certain policies, such as underage drinking or use of illicit drugs at the time of the incident. Respondents may hesitate to be forthcoming during the process for the same reasons.

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

To encourage reporting and participation in the process, college offers student Parties and witnesses amnesty from minor policy violations, such as underage alcohol consumption or the use of illicit drugs, related to the incident. Employees may also be granted amnesty for minor policy violations. Granting amnesty is a discretionary decision made by the college, and amnesty does not apply to more serious allegations, such as physical abuse of another or illicit drug distribution.

11.G. False Allegations and Evidence

The college takes the accuracy of information very seriously, as an accusation of racism, homophobia, sexual harassment, sexual violence, stalking, or dating or domestic violence, or other harassment or discrimination, may have severe consequences. Knowingly making a false report or complaint under this policy, or knowingly providing false or intentionally misleading information during an investigation, may result in disciplinary action up to and including dismissal from the college or termination of employment. A good faith complaint that results in a determination that the evidence is not sufficient to support a formal charge or to constitute a violation of this policy is not considered to be a false report.

Parties or witnesses may be subject to disciplinary action if they engage in any of the following:

- knowingly fabricating or otherwise providing false evidence;
- destroying or tampering with evidence;
- pressuring other parties to provide false information or evidence; and
- deliberately misleading any official involved in the resolution of the complaint.

It is a violation of the Student Code of Conduct and the Employee Handbook to make an intentionally false report of any college policy violation or to obstruct college disciplinary procedures. Filing a false report may also violate state criminal statutes and civil defamation laws.

11.H. Counterclaims

The college is obligated to ensure that the grievance process is not abused for retaliatory purposes. This policy permits the filing of counterclaims but uses an initial assessment to assess whether the allegations in the counterclaim are made in good faith. Counterclaims determined to have been reported in good faith will be resolved using the resolution procedures outlined in this policy. Counterclaims made in bad faith or with retaliatory intent will be dismissed.

Counterclaims may be resolved through the same investigation and/or hearing as the underlying allegation or may take place after resolution of the underlying initial allegation at the discretion of the Title IX Coordinator. As with initial complaints, any good faith counterclaim that results in a determination that the evidence is not sufficient to constitute a violation of this policy is not considered to be a false report.

When counterclaims are not made in good faith, they will be considered a false report and may constitute a violation of the college's retaliation prohibition as well. As a result, any individual filing a counterclaim in bad faith may be subject to disciplinary action up to and including dismissal from the college or termination of employment.

11.I. Reports Involving Minors or Suspected Child Abuse

When a report involves suspected abuse of a minor under the age of 18, the college is required by state law to notify the Maine Office of Child and Family Services and/or the District Attorney's office. This requirement extends to resources designated as confidential by the college, including staff and

counselors at Bates Health Services and Bates Counseling and Psychological Services, ordained Multifaith Chaplains, Ombuds, and the Confidential Resource Advisor.

11.J. Reluctance by Complainant to Pursue Resolution

If a Complainant does not wish for their name to be shared, does not wish for an investigation to take place, or does not want a formal complaint to be pursued, they may make such a request to the Title IX Coordinator, who will evaluate that request in light of the duty to ensure the safety of the campus and to comply with state or federal law.

In cases in which the Complainant requests confidentiality or no formal action and the circumstances allow the Title IX Coordinator to honor that request, the Title IX Coordinator will offer administrative resolution options and supportive measures to the Complainant and the community, but will not otherwise pursue the formal grievance process.

If the Complainant elects to take no action, they can change that decision if they decide to pursue a formal complaint at a later date. Upon making a formal complaint, a Complainant has the right, and can expect, to have allegations taken seriously and to have the allegations investigated and properly resolved through these procedures. Delays in proceeding with the formal grievance process may cause limitations on access to evidence, or present issues with respect to the status of the parties.

The Title IX Coordinator has ultimate discretion over whether the college proceeds when the Complainant does not wish to do so, and the Title IX Coordinator may sign a formal complaint to initiate a Formal Resolution process upon completion of an appropriate initial assessment. A Formal Resolution process will result from any violence risk assessment that shows a compelling risk to health and/or safety that requires the college to pursue formal action to protect the community. A compelling risk to health and/or safety may result from evidence of patterns of misconduct, predatory conduct, threats, abuse of minors, use of weapons, and/or violence. The college may also be compelled to act on alleged employee misconduct irrespective of a Complainant's wishes.

When the Title IX Coordinator executes the written complaint, they do not become the Complainant. The Complainant remains the individual who is alleged to be the victim of conduct that could constitute a violation of this policy and that individual may have as much or as little involvement in the process as they wish. The Complainant retains all rights of a Complainant under this policy irrespective of their level of participation.

The college's ability to remedy and respond to notice may be limited if the Complainant wishes to maintain anonymity or does not want to proceed with an investigation and/or resolution process.

11.K. Withdrawal of Complaint

The Complainant may withdraw a formal complaint prior to the completion of the resolution options described in this policy. Withdrawal of the complaint will, in most circumstances, end any investigation or process taking place under this policy. The college reserves the right to move forward with a complaint, even after the Complainant withdraws it, in order to protect the interests and safety of the college community. A Complainant who wishes to withdraw their complaint should discuss the matter with the Title IX Coordinator who will assist them.

12. Supportive Measures and Protective Actions

- A. Range of Supportive Measures
- B. Emergency Removal and Administrative Leave
- C. Court-Issued Protection or Orders

Upon receipt of any notice of alleged bias, harassment, discrimination, or retaliation, the college will provide reasonable and appropriate supportive measures designed to mitigate the effects of the alleged behavior and protect the parties involved. These non-disciplinary and non-punitive measures will be determined on a case-by-case basis and will be offered without charge. The goal of these measures is to: a) restore or preserve the party's access to the college's education program or activity; b) protect the safety of all parties or the Bates community; and c) deter any further harassment, discrimination, or retaliation. The college will make every effort to communicate with the Complainant to ensure that all safety and emotional and physical well-being concerns are being addressed and that their wishes are considered with respect to which measures are implemented. Supportive measures are available whether or not a formal complaint is filed or Formal Resolution under this policy is sought by the Complainant.

Supportive measures may be available upon notice even if the reported behavior may be protected free expression, occurred outside of the college's jurisdiction, or for any other reason is not subject to the college's grievance procedures. Supportive measures may be available to other students or employees who are not the Complainant, depending on the nature of the allegations and their impact.

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

The college may choose to impose supportive measures, such as a campus No Contact Order, at its discretion to ensure the safety of all parties, the safety of the broader college community, and/or the integrity of the resolution process. All individuals are encouraged to report concerns about failure of another individual to abide by any restrictions imposed by a safety measure. The college will take responsive action to enforce a previously implemented measure.

12.A. Range of Supportive Measures

Supportive measures may be applied to any party and include, but are not limited to:

- Assistance with medical or therapeutic care:
 - Providing access to counseling, medical, or other healthcare services;
 - Assistance in setting up initial appointments;
- Assistance to accessing confidential services:
 - Providing a referral to the Employee Assistance Program;
 - Providing a referral and assistance setting up an appointment with on campus confidential resources;
 - Assistance with access to off campus resources (Safe Voices, Immigrant Resource

- Center, Sexual Assault Prevention and Response Services, etc.);
- Assistance with academic needs (in conjunction with faculty, as necessary):
 - Rescheduling of exams and assignments;
 - Providing alternative course completion options;
 - Changing a class schedule, including the ability to take deferral, drop a course without penalty, or transfer sections;
 - Providing academic support services, such as tutoring;
- Assistance with personal safety:
 - Imposing a No Contact Order between parties;
 - Issuing No Trespass Orders;
 - Providing an escort to ensure safe movement between classes and activities;
 - Assisting with transportation needs;
 - Increased security or monitoring of certain areas of campus;
 - Safety planning assistance;
 - Issuing a Timely Warning;
- Assistance with housing and dining:
 - Changing an on-campus housing assignment;
 - Providing assistance from college support staff in completing housing relocation;
 - Individualized assistance with accessing dining services;
- Changing a work schedule or job assignment;
- Delivering training or education to the community, organization, group, or individual;
- Facilitating a voluntary leave of absence or withdrawal;
- Financial Aid counseling;
- Visa or immigration status assistance; and
- Any other remedy that can be tailored to the involved individuals (students or employees) to achieve the goals of this policy.

The parties may seek additional supportive measures or modification or termination of existing ones applicable to them if circumstances materially change by contacting the Title IX Coordinator, a member of the Non-Discrimination Team, or the Confidential Resource Advisor.

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

12.B. Emergency Removal and Administrative Leave

Where the report under this policy poses a substantial and immediate threat of harm to the safety or well-being of an individual or members of the campus community, or to the performance of normal college functions, the college may remove a Respondent from the college on a temporary, emergency

basis. Pending resolution of the report, the individual may be denied access to campus, campus facilities, and/or all other college activities or privileges for which the individual might otherwise be eligible. Due to the potentially significant impact of this action, the decision to remove a Respondent is not taken lightly. Emergency removal of students will occur only after an individualized safety and risk analysis has determined that an immediate and serious threat to the physical health and safety of any student or other individual justifies removal. This risk analysis is performed by the Title IX Coordinator in conjunction with the [Bates Care Collaborative \(BCC\)](#) using its standard objective violence risk assessment procedures. If this analysis suggests it is appropriate to remove an individual, the Title IX Coordinator will forward a recommendation for removal to either the Dean of Students who will make the final determination for all students or the Assistant Vice President of Human Resources (AVP for HR) who will make the final determination for all employees.

The college will implement the least restrictive emergency actions possible in light of the circumstances and safety concerns. These actions could include, but are not limited to:

- removing a student from a residence hall;
- temporarily re-assigning an employee;
- restricting a student's or employee's access to or use of facilities or equipment;
- allowing a student to withdraw or take grades of incomplete;
- authorizing an administrative leave; and
- suspending a student's participation in extracurricular activities, student employment, student organizational leadership, or intercollegiate athletics.

Whenever possible, alternative coursework options may be pursued to ensure as minimal an academic impact as possible on the party.

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

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

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

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

Nothing in this policy limits the college from placing an employee on Administrative Leave, using the existing provisions in the Employee Handbook.

12.C. Court-Issued Protection or Restraining Orders

Individuals who have obtained a court-issued protection or restraining order should contact the Director of Campus Safety to share the order and discuss steps the college can take to assist with the enforcement of the order on campus. Campus Safety will coordinate with local law enforcement and other college officials, including the Title IX Coordinator, to meet its obligations under the order.

13. Initial Review and Resolution Options

- A. Overview of Resolution Options
- B. Role of the Title IX Coordinator and Non-Discrimination Team in Resolution Process
- C. Initial Review
 - 1. Violence Risk Assessment
 - 2. Title IX Dismissal
 - 3. Appeal of Dismissal
- D. Administrative Resolution
- E. Informal Resolution
 - 1. Alternative Resolution
 - 2. Acceptance of Responsibility by Respondent
 - 3. Negotiated Resolution
- F. Formal Resolution
 - 1. Investigation
 - 2. Hearing
 - 3. Appeal

The college provides a number of ways to resolve reports/complaints of potential violations of this policy. The sections below outline these options and the procedures used to implement them. Resolution Process is used below as an umbrella term encompassing the college's response to a report or complaint under this policy and all resolution options offered by the college. When procedures apply to only a specific resolution process, the name of that process will be used.

13.A. Overview of Resolution Options

Upon receipt of a report of bias, harassment, discrimination, or retaliation, including sexual violence, the Associate Vice President for Title IX & Civil Rights Compliance/Title IX Coordinator ("Title IX Coordinator") will reach out to the Complainant to offer supportive measures and to inform them of how to file a formal complaint, outline resolution options, and determine how the Complainant wishes to proceed. The Title IX Coordinator also will begin an initial evaluation to determine the college's next steps. The initial steps for resolution of any report of harassment will involve the same stages: initial assessment, implementation of supportive measures, followed by an administrative response, an

informal resolution option, or a formal investigation and resolution process as appropriate.

The Title IX Coordinator, in consultation with members of the Non-Discrimination Team as appropriate, will conduct an initial review of the report. The goal of this review is to provide an integrated and coordinated response to reports of misconduct. The review will consider the nature of the report, the safety of the individuals involved and of the campus community, and the Complainant's expressed preference for resolution. Upon completion of the initial review, the Title IX Coordinator will determine the next steps in the resolution of the report. In most circumstances, the college will defer to the wishes of the Complainant on how to proceed.

If an informal, non-disciplinary resolution is desired, the Title IX Coordinator will work with the Complainant to determine and implement an administrative response to a) support the Complainant and restore their access to the college's education program and activities; b) stop any harassment or discrimination that may be occurring; and c) prevent the recurrence of the alleged behavior wherever possible. When informal, administrative action is taken, there is no determination of whether a policy violation has occurred.

If a formal disciplinary resolution process is desired and appropriate, an investigation will be initiated. The goal of the investigation is to gather all relevant facts. Upon completion of the investigation, a hearing will be held to determine if there is a preponderance of evidence that a violation of the policy occurred. If the Respondent is found responsible for a policy violation, disciplinary sanctions will be implemented.

The college may consolidate complaints against more than one Respondent, or by more than one Complainant against one or more Respondents, when the allegations arise from the same facts or circumstances or implicate a pattern, collusion, and/or other shared or similar actions.

Detailed procedures for resolving formal complaints are outlined in Appendix A and Appendix B.

13.B. Role of the Title IX Coordinator and Non-Discrimination Team in Resolution Process

The President of Bates College has designated Gwen Lexow, Associate Vice President for Title IX and Civil Rights Compliance, to serve as the college's Title IX Coordinator (hereafter, "Title IX Coordinator"). The Title IX Coordinator oversees the college's centralized review and resolution of all reports of bias, harassment, and discrimination, including, sexual assault, stalking, domestic and dating violence. The Title IX Coordinator is supported by Title IX Deputy Coordinators who along with the Title IX Coordinator comprise the Non-Discrimination Team. As neutral parties, the Title IX Coordinator and Deputies ensure the following:

- any party involved in the reporting or resolution of a report is treated with respect, dignity, and fairness;
- parties are afforded their rights under this policy;
- all appropriate resolution procedures are followed;
- all parties receive timely and clear communication regarding the resolution of the report; and
- parties receive appropriate supportive measures to assist them with their education while the report is resolved.

13.C. Initial Review

The Title IX Coordinator conducts an initial assessment typically within seven (7) business days of receiving a report of alleged misconduct.¹¹ The Initial Review will proceed to the point where there is a clear understanding of the allegations and a reasonable assessment of the safety of the individuals involved and of the campus community can be made. Should the college determine there is any risk of harm to individuals or to the campus community, it will take steps necessary to address those risks. The initial evaluation may include:

- assessing whether the reported conduct may reasonably constitute a violation of the Policy;
- determining whether the college has jurisdiction over the reported conduct, as defined in the Policy;
- assessing whether the 2020 federal Title IX regulations may apply to the reported conduct;
- offering and coordinating supportive measures for the Complainant;
- offering and coordinating supportive measures for the Respondent, as applicable;
- determining whether the Complainant wishes to initiate a Complaint;
- assessing whether there are any immediate risks to the safety of the Complainant and the broader campus community that need to be addressed;
- notifying the Complainant of the following:
 - how to file a formal complaint;
 - their right to contact law enforcement and seek medical treatment;
 - their right to have an Advisor;
 - the importance of preservation of evidence;
 - the availability of on and off campus resources;
 - the range of available supportive and safety measures;
 - the range of the procedural options, including informal remedies-based resolution (Administrative Action), Informal Resolution and the Formal Resolution Process; and
 - the college's policy prohibiting retaliation;
- discussing with the Complainant their expressed preference for the manner of resolution and if there are any barriers to proceeding;
- assessing whether there is evidence of an ongoing pattern of behavior or other similar conduct by Respondent;
- notifying Campus Safety to record the report as part of the college's daily crime log, as applicable; and
- assessing the reported conduct for the need for a timely warning under the Clery Act.

If a Complainant wishes to file a formal complaint, the Title IX Coordinator will facilitate doing so and will work with them to ensure the complaint is filed correctly. If a Complainant does not wish to file a complaint at this time, the Title IX Coordinator will determine whether the Coordinator needs to initiate a complaint because a violence risk assessment indicates a compelling threat to the health and/or safety of any other individual or the broader community. Initiating a complaint without the support of the

¹¹ If circumstances require, the Title IX Coordinator will designate another person to oversee the Resolution Process should an allegation be made about the Title IX Coordinator or the Title IX Coordinator is otherwise unavailable, unable to fulfill their duties, or has a conflict of interest.

Complainant will be done only when circumstances are such that it is necessary to protect the broader community or other compelling reason.

Once a formal complaint is filed the Complainant may decide whether they prefer informal or formal resolution of the complaint. If the Complainant prefers an informal resolution option, the Title IX Coordinator will assess whether the complaint is suitable for informal resolution and may seek to determine if the Respondent is also willing to engage in informal resolution.

If the Complainant desires formal resolution of the complaint, including an investigation and hearing, the Title IX Coordinator will determine if the misconduct alleged falls within the scope of the 2020 Title IX regulations. If it does, the Title IX Coordinator will initiate the formal investigation and resolution process, directing the investigation to address one or more of the following: a single incident of prohibited behavior, a pattern of alleged misconduct, and/or a culture/climate issue, based on the nature of the complaint. If the Title IX Coordinator determines that the 2020 Title IX regulations do not apply, they will “dismiss” that aspect of the complaint. They will then assess which resolution process is applicable and refer the matter to that process accordingly.¹² Please note that dismissing a complaint under the 2020 Title IX regulations is solely a procedural requirement under the regulations, and does not limit Bates’s authority to address a complaint with an appropriate process and remedies.

When the Complainant prefers a supportive or administrative response (with or without the filing of an official complaint), the Title IX Coordinator will work with the Complainant to identify their wishes, assess the request, and implement the requests accordingly. No Formal Resolution Process is initiated, though the Complainant can elect to initiate one at a later date, if desired.

13.C.1. Violence Risk Assessment

In some cases, the Title IX Coordinator may determine that a Violence Risk Assessment (VRA) should be conducted by the Bates Care Collaborative (BCC) as part of the initial assessment. A VRA can aid in ten critical and/or required determinations, including:

- assessment of the need for emergency removal of a Respondent on the basis of an immediate threat to the physical health and/or safety of another person or the broader community;
- whether the Title IX Coordinator should pursue a formal complaint absent a willing/able Complainant;
- whether the scope of the investigation should include a single incident and/or a pattern of misconduct, and/or a climate of hostility or harassment;
- to help identify potential predatory conduct;
- to help assess and identify grooming behaviors;
- assessment of whether it is reasonable to attempt to resolve a complaint through Informal

¹² All complaints that include allegations of Sexual Harassment (including sexual assault, sexual harassment, domestic violence, dating violence, and stalking) will be resolved using Process A. Complaints that allege other prohibited conduct under this policy involving Respondents who are students will typically follow Process B. Complaints that allege other prohibited conduct involving Respondents who are employees typically will be resolved using the procedures outlined in the Employee and/or Faculty Handbooks as applicable. The college reserves the right to determine which process is most appropriate. The Title IX Coordinator will make this determination based upon the nature of the allegation(s).

- Resolution, and if so, what approach may be most successful;
- whether to permit a voluntary withdrawal by the Respondent;
- whether to impose transcript notation on the Respondent's official transcript, or otherwise alert another institution of the allegations against the Respondent;
- assessment of appropriate sanctions and remedies (to be applied post-hearing); and/or
- whether a Clery Act Timely Warning or other protective measure, such as a No Contact Order or Trespass order is needed.

Threat assessment is the process of evaluating the actionability of violence by an individual against another person or group following the issuance of a direct or conditional threat. A VRA is a broader term used to assess any potential violence or danger, regardless of the presence of a vague, conditional, or direct threat.

A VRA is not an evaluation for an involuntary behavioral health hospitalization, nor is it a psychological or mental health assessment. A VRA assesses the risk of actionable violence, often with a focus on targeted or predatory escalations, and is supported by research from the fields of law enforcement, criminology, human resources, and psychology.

VRAs require specific training and are typically conducted by psychologists, clinical counselors, social workers, case managers, law enforcement officers, student conduct officers, or other Bates Care Collaborative (BCC) team members. A VRA authorized by the Title IX Coordinator will occur in collaboration with the BCC. Where a VRA is required by the Title IX Coordinator, refusal to cooperate in a VRA by a Respondent may result in disciplinary action for failure to comply with a college official or disciplinary process within the appropriate student or employee conduct process.

13.C.2. Title IX Dismissal

The 2020 federal Title IX Regulations (34 CFR§106.45) require Title IX Coordinators to dismiss a formal complaint under certain conditions. The Title IX Coordinator is also granted the latitude to dismiss a complaint for Title IX purposes based on additional criteria. These dismissals are referred to as mandatory and discretionary dismissals and may be strictly procedural. Upon any dismissal, the Title IX Coordinator will promptly send written notice of the dismissal and the rationale for doing so simultaneously to the parties. Further information about next steps in the resolution of the complaint will be included in any dismissal notice. Dismissal decisions, including decisions not to dismiss, are appealable by any party under the procedures for appeal below.

Mandatory Dismissal Criteria

The Title IX Coordinator must dismiss a formal complaint or any allegations therein if, at any time during the initial review, investigation, or hearing, it is determined one or more of the following:

- the conduct alleged in the formal complaint would not constitute Title IX Sexual Harassment as defined in section 8, even if proven;
- the alleged sex-based conduct did not occur in a Bates College educational program or activity and/or the college did/does not have control over the Respondent;
- the conduct did not occur against a person in the United States; and

- at the time of filing a formal complaint, a Complainant alleging sex-based conduct is not participating in or attempting to participate in a Bates College education program or activity and based on the available information the Title IX Coordinator has determined they do not need to sign a formal complaint.

Discretionary Dismissal Criteria

The Title IX Coordinator may dismiss a formal complaint or any allegations therein if, at any time during the initial review, investigation, or hearing:

- a Complainant notifies the Title IX Coordinator in writing that the Complainant would like to withdraw the formal complaint or any allegations therein;¹³ or
- the Respondent is no longer enrolled in or employed by the college; or
- specific circumstances prevent the college from gathering evidence sufficient to reach a determination as to the formal complaint or allegations therein.

13.C.3. Appeal of Dismissal

The Parties may appeal a decision to dismiss or not to dismiss their formal complaint. All dismissal appeal requests must be filed within three (3) business days of the notification of the dismissal decision.

A dismissal may be appealed on the following grounds:

- a procedural irregularity affected the outcome of the matter;
- new evidence that was not reasonably available at the time the determination regarding 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 specific Complainant or Respondent that affected the outcome of the matter; or
- the dismissal was erroneously granted or denied.

The appeal should specify at least one of the grounds above and provide any reasons or supporting evidence for why the ground is met. Upon receipt of a written dismissal appeal request from one or more Parties, the Title IX Coordinator will share the request and supporting documentation with all other Parties and provide three (3) business days for other Parties and the Title IX Coordinator to respond to the request. At the conclusion of the response period, the Title IX Coordinator will forward the request, as well as any response provided by the other Parties and/or the Title IX Coordinator to the Dismissal Appeal Decision-maker for consideration.

If the appeal request does not provide information that meets the grounds in the Policy, the Dismissal Appeal Decision-maker will deny the request, and the Parties, their Advisors, and the Title IX Coordinator will be notified in writing of the denial and the rationale.

If any of the asserted grounds in the appeal satisfy the grounds described in the Policy, then the

¹³ A Complainant who decides to withdraw a complaint may later request to reinstate it or refile it.

Dismissal Appeal Decision-maker will notify all Parties and their Advisors, and the Title IX Coordinator of their decision and rationale in writing. The effect will be to reinstate the Complaint.

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

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

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

13.D. Administrative Resolution

Administrative resolution is a remedies-based, non-judicial approach designed to address the needs of the Complainant and/or to eliminate the offending conduct or any hostile environment without taking disciplinary action against a Respondent. Complainants who do not wish to file a formal complaint may request administrative interventions in conjunction with the supportive measures the college offers.

Where the Initial Review concludes that Administrative Resolution may be appropriate, the college will take immediate and corrective action designed to maximize the Complainant's access to the educational activities at the college and to eliminate a hostile environment. These actions may include any of the supportive or protective measures detailed in section 12.

Any actions taken as a result of Administrative Resolution must be non-disciplinary and non-punitive. There is no determination of whether a policy violation has occurred.

Complainants who request Administrative Resolution retain the right to file a formal complaint and request Informal or Formal Resolution of that complaint at a later date.

13.E. Informal Resolution

Informal Resolution provides the parties with an opportunity to reach a mutually-agreeable resolution of a complaint without a full formal grievance process. Informal Resolution may be requested by either party after the filing of a formal complaint, but prior to the start of the hearing. Informal Resolution may take three different forms — resolution through an alternative resolution method, acceptance of responsibility by the Respondent, and negotiated resolution by the Title IX Coordinator. Each of the forms is described below.

Upon receiving notice that either party would like to pursue Informal Resolution, the Title IX Coordinator will do the following:

- Confirm the appropriateness of Informal Resolution, based upon the Initial Review;
- Determine which form(s) of Informal Resolution may be most appropriate;
- Notify parties of the following:

- the request to pursue Informal Resolution;
 - that participation in Informal Resolution is strictly voluntary;
 - the nature of the allegations and the sanctions and remedies that may result from participating in the process;
 - their right to decline Informal Resolution and/or to stop the process at any time once it has begun;
 - their right to pursue Formal Resolution at any time prior to reaching an agreement;
 - their right to an Advisor of their choosing, as applicable;
 - information regarding recordkeeping related to Informal Resolution, including what information will be maintained or shared related to the complaint.
- Obtain written confirmation that all parties wish to resolve the matter through Informal Resolution before proceeding.

Results of successful Informal Resolution are not appealable. Failure to abide by the resolution agreement may result in appropriate responsive or disciplinary actions.

13.E.1. Alternative Resolution

Alternative Resolution is an informal resolution mechanism, such as mediation or restorative practices, by which the parties reach a mutually agreed upon resolution of an allegation. All parties must consent prior to the use of an alternative resolution mechanism.

When deciding whether Alternative Resolution is appropriate and which form of Alternative Resolution may be most successful for the parties, the Title IX Coordinator will consider the following:

- parties' amenability to Alternative Resolution and motivation to participate;
- the goals or desired outcomes of the parties;
- the likelihood of potential resolution, taking into account any power dynamics between the parties and the complexity of the complaint;
- results of any violence risk assessment/ongoing risk analysis, including whether emergency removal is necessary;
- prior disciplinary history of the parties;
- the relationship between the parties and their ability to engage in Alternative Resolution with each other;
- the skill of the Alternative Resolution facilitator with this type of allegation; and
- whether adequate resources exist to invest in Alternative Resolution (time, staff, etc.).

The ultimate determination of whether Alternative Resolution is available and whether it has been successful is to be made by the Title IX Coordinator. The Title IX Coordinator maintains records of any resolution that is reached, and failure to abide by the resolution agreement may result in appropriate responsive and/or disciplinary actions. Results of complaints resolved by Alternative Resolution are not appealable.

13.E.2. Acceptance of Responsibility by Respondent

At any point during the resolution process, the Respondent may choose to accept responsibility for all

or part of the alleged misconduct. If the Respondent indicates an intent to accept responsibility for all of the alleged misconduct, the resolution process will be paused, and the Title IX Coordinator will determine whether Informal Resolution can be used according to the criteria above.

If Informal Resolution is appropriate, the Title IX Coordinator will determine whether all parties and the college are able to agree on the responsibility, sanctions, and/or remedies. If agreement can be reached, the Title IX Coordinator will provide written notice that the Respondent is responsible for a violation(s) of this policy and will implement the agreed-upon sanctions and/or remedies, in coordination with other appropriate administrator(s), as necessary. These sanctions or responsive actions will be implemented promptly in order to effectively stop the harassment or discrimination, prevent its recurrence, and remedy the effects of the discriminatory conduct, both on the Complainant and the community.

This result is not subject to appeal once all parties indicate their written assent to all agreed upon terms of resolution. When the parties cannot agree on the terms of resolution, the Formal Resolution Process may be initiated or resumed at the same point where it was paused.

13.E.3. Negotiated Resolution

With the consent of the parties, the Title IX Coordinator may negotiate and implement an agreement to resolve the allegations that satisfies all parties and the college. If an agreement can be reached, the Title IX Coordinator will provide written notice of the terms of the agreement and will oversee the parties' compliance with those terms. The Title IX Coordinator maintains records of any resolution that is reached, and failure to abide by the resolution agreement may result in appropriate responsive and/or disciplinary actions. Negotiated Resolutions are not appealable.

13.F. Formal Resolution

Formal Resolution is the formal grievance process that includes a fact-gathering investigation into the complaint, a determination hearing, and opportunities for appeal. The goal of Formal Resolution is to determine whether the Respondent is responsible for a violation of this policy. If the Respondent is found responsible for a policy violation, disciplinary sanctions and/or remedial actions will also be determined.

The formal grievance procedures are guided by the principles of fundamental fairness and respect for all parties, which require notice, an equitable opportunity to be heard, and an equitable opportunity to respond to a report under this policy. All grievance procedures used to resolve Title IX Sexual Harassment and other Title IX allegations are in compliance with the 2020 federal regulations regarding the handling of Sexual Harassment under Title IX.

The specific procedures for Formal Resolution are detailed in Appendix A and Appendix B. Below is a summary of the major components of the Formal Resolution process.

13.F.1 Investigation

Where the Initial Review concludes that a policy violation may have occurred and disciplinary action may be appropriate, the college may initiate a formal investigation. The college will designate one or more a trained Investigator(s) who has specific training and experience investigating allegations of

discrimination, harassment, or retaliation. The Investigator(s) may be employees of the college, external consultants engaged to assist the college in its fact gathering, or any combination thereof. Any Investigator chosen to conduct the investigation must be impartial and free of any conflict of interest.

The Investigator(s) will conduct the investigation in a manner appropriate in light of the circumstances of the case, which will typically include interviews with the Complainant, the Respondent, and any witnesses. The Investigator(s) will also gather any available physical evidence, including documents, communications between the parties, and other electronic records as appropriate. In gathering the facts, the Investigator(s) may consider prior allegations of similar conduct by the Respondent to the extent such information is relevant.

As part of the investigation, the college will provide an opportunity for the parties to suggest witnesses and to present other evidence. The Investigator(s) will provide periodic updates to the Title IX Coordinator regarding the investigation timeline and any emerging needs for the Complainant or Respondent. Throughout the investigation and prior to the hearing, the parties will have opportunities to review all relevant evidence and the investigation report.

The investigation is intended to provide a fair and reliable gathering of the facts. It will be thorough, impartial, and fair, and all individuals will be treated with appropriate sensitivity and respect. As described in section 5, the investigation will be conducted in a manner that is respectful of individual privacy concerns.

The college will seek to complete the initial investigation within 90 (ninety) calendar days of initiating the investigation. This time frame may be extended depending on the complexity of the circumstances of each case and the impact of the academic calendar.

13.F.2. Hearing

Upon completion of the investigation, a determination hearing will be scheduled, provided the complaint is not resolved through Informal Resolution. The goal of this hearing is to provide the parties with an opportunity to be heard by one or more impartial decision-makers. After the presentation of all evidence, the Hearing Officer(s) will determine whether the Respondent is responsible for a violation of this policy based upon a preponderance of evidence and, if so, appropriate sanctions and/or remedies.

At the discretion of the Title IX Coordinator, the college will designate one or more Hearing Officer(s) to preside over the hearing. The Hearing Officer(s) may be employees of the college, external consultants engaged to assist the college in its resolution of the complaint, or a combination thereof. Any Hearing Officer chosen to conduct the hearing must be impartial and free of any conflict of interest. In all cases, these individuals will have received specific training related to resolution of allegations of discrimination, harassment, or retaliation.

The Hearing Officer(s) will conduct the hearing following the procedures outlined in Appendix A and Appendix B. These procedures provide the Complainant and the Respondent with opportunities to be heard and to challenge the evidence presented by and credibility of the other party. Upon a finding of responsibility, the parties will be able to submit an impact statement for the Hearing Officer(s) to consider when determining appropriate sanctions. The Hearing Officer(s) will also consider the prior conduct history of the Respondent when determining sanctions.

After the completion of the hearing, the Complainant and Respondent will receive a written Notice of the Outcome of the hearing including the final determination, the rationale for the determination, and any sanctions. The Notice will also include relevant procedures for appealing the determination.

The college seeks to provide a fair and reliable determination of whether a policy violation has occurred. The hearing will be thorough, impartial, and fair, and all individuals will be treated by the Hearing Officer(s) with appropriate sensitivity and respect. As described in section 5, the hearing will be conducted in a manner that is respectful of individual privacy concerns.

13.F.3. Appeal

Both the Complainant and the Respondent are afforded opportunities to appeal on limited grounds. If an appeal meets the limited grounds, the non-appealing party will be notified of the appeal and have an opportunity to respond to it. Appeals are not intended to be a full re-hearing of the allegations or evidence.

At the discretion of the Title IX Coordinator, the college will designate either one or more Appeal Decision-maker to review and rule on the appeal. The Appeal Decision-maker(s) may be employees of the college, external consultants engaged to assist the college in its resolution of the complaint, or a combination thereof. Any Appeal Decision-maker chosen to hear the appeal must be impartial and free of any conflict of interest. In all cases, these individuals will have received specific training related to resolution of allegations of discrimination, harassment, or retaliation.

The Appeal Decision-maker(s) will gather and review all relevant information prior to making a decision on appeal. Once a decision on appeal has been made, a Notice of Appeal Outcome will be sent to all parties. This Notice will specify the findings and rationale for each decision, as well as next steps in the resolution process, if any.

Sex Offender Registration

The federal Campus Sex Crimes Prevention Act, enacted on October 28, 2000, requires institutions of higher education to issue a statement advising the campus community where law enforcement information provided by a State concerning registered sex offenders may be obtained. It also requires sex offenders already required to register in a State to provide notice, as required under State law, to each institution of higher education in that State at which the person is employed, carries on a vocation, volunteers services or is a student.

In the State of Maine, convicted sex offenders must register with the law enforcement agency having jurisdiction in those areas where the offender is domiciled, resides, works or attends school. You can access the State of Maine website at apps.web.maine.gov/cgi-bin/sor/index.pl

Risk Reduction and Warning Signs of Abusive Behavior

No victim is ever to blame for being assaulted or abused. Unfortunately, a person who is the victim of sexual or dating violence is more likely to be re-victimized. Below are some tips to help reduce your risk, to recognize warning signs of abusive behavior and how to avoid potential attacks.

Warning Signs of Abusive Behavior

Domestic and dating abuse often escalates from threats and verbal abuse to violence. And, while physical injury may be the most obvious danger, the emotional and psychological consequences of domestic and dating violence are also severe. Warning signs of dating and domestic violence include:

- Being afraid of your partner;
- Constantly watching what you say to avoid a “blow up”;
- Feelings of low self-worth and helplessness about your relationship;
- Feeling isolated from family or friends because of your relationship;
- Hiding bruises or other injuries from family or friends;
- Being prevented from working, studying, going home, and/or using technology (including your cell phone);
- Being monitored by your partner at home, work or school; and
- Being forced to do things you don’t want to do.

Help Reduce Your Risk and Avoid Potential Attacks

If you are being abused or suspect that someone you know is being abused, speak up or intervene:

- Get help by contacting the Health Services, Counseling and Psychological Services, the Student Affairs Office, the Confidential Resource Advisor, or the Title IX Coordinator;
- Learn how to look for “red flags” in relationships so you can learn to avoid some of those characteristics in future partners;
- Consider making a report with Campus Safety and/or the Title IX Coordinator;
- Ask for a “no contact” directive from the college to prevent future contact;
- Learn more about what behaviors constitute dating and domestic violence. Understand it is not your fault, and talk with friends and family members about ways you can be supported; and
- Trust your instincts — if something doesn’t feel right in a relationship, speak up or end it.

Sexual Assault Prevention in a Social Situation (Adapted from RAINN)

While you can never completely protect yourself from sexual assault, there are some things you can do to help reduce your risk of being assaulted in social situations:

- When you go to a social gathering, go with a group of friends. Arrive together, check in with each other throughout the evening, and leave together. Knowing where you are and who is around you may help you to find a way out of a bad situation.

- Trust your instincts. If you feel unsafe in any situation, go with your gut. If you see something suspicious, contact campus safety or local law enforcement immediately.
- Don't leave your drink unattended while talking, dancing, using the rest room, or making a phone call. If you've left your drink alone, just get a new one.
- Don't accept drinks from people you don't know or trust. If you choose to accept a drink, go with the person to the bar to order it, watch it being poured, and carry it yourself. At parties, don't drink from the punch bowls or other large, common open containers.
- Watch out for your friends, and vice versa. If a friend seems out of it, is too intoxicated, or is acting out of character, get him or her to a safe place immediately.
- If you suspect you or a friend has been drugged, contact law enforcement immediately. Be explicit with doctors so they can administer the correct tests.

If Someone is Pressuring You

If you need to get out of an uncomfortable or scary situation here are some things that you can try:

- Remember that being in this situation is not your fault. You did not do anything wrong; it is the person who is making you uncomfortable that is to blame.
- Be true to yourself. Don't feel obligated to do anything you don't want to do. "I don't want to" is always a good enough reason. Do what feels right to you and what you are comfortable with.
- Have a code word with your friends or family so that if you don't feel comfortable you can call them and communicate your discomfort without the person you are with knowing. Your friends or family can then come to get you or make up an excuse for you to leave.
- Lie. If you don't want to hurt the person's feelings it is better to lie and make up a reason to leave than to stay and be uncomfortable, scared, or worse. Some excuses you could use are: needing to take care of a friend or family member, not feeling well, having somewhere else that you need to be, etc.
- Try to think of an escape route. How would you try to get out of the room? Where are the doors? Windows? Are there people around who might be able to help you? Is there an emergency phone nearby?
- If you and/or the other person have been drinking, you can say that you would rather wait until you both have your full judgment before doing anything you may regret later.

Timely Warnings

In compliance with the Clery Act, the Bates College Campus Safety Department will provide timely warnings upon the confirmation of a significant emergency or dangerous situation involving an immediate threat to the health or safety of students, employees, and others on campus.

The Director of Campus Safety or a designee will develop timely warning notices to notify members of the college community about serious crimes against people that occur on campus, when it is determined that such incidents may pose an ongoing threat to members of the college community. Timely Warning Notices are usually distributed for the following Uniform Crime Reporting Program (UCR)/ National Incident-Based Reporting System (NIBRS) classifications:¹⁴

- Arson
- Criminal homicide
- Robbery
- Aggravated Assault

For example, if an assault occurs between two students who have a disagreement, there may be no ongoing threat to other college community members; therefore, a Timely Warning Notice would not be distributed. Sexual assaults are considered on a case-by-case basis depending on the facts of the case, when and where the incident occurred, when it was reported, and the amount of information known by Campus Safety. Timely Warning Notices may be distributed for other crimes as determined necessary by the Director of Campus Safety or designee.

Campus Safety does not issue a Timely Warning or emergency notification for the crimes listed above if **(a)** the suspect(s) is apprehended and the threat of imminent danger to the campus community has been mitigated by the apprehension; **(b)** a report was not filed with Campus Safety; or **(c)** Campus Safety was not notified by campus security authorities in a manner that would allow the department to post a “timely” warning to the community. Unless there are extenuating circumstances, a report that is filed more than five days after the date of the alleged incident may not allow Campus Safety to post a “timely” warning to the community.

This type of situation will be evaluated on a case-by-case basis.

In an effort to provide timely notice to the college community, and in the event of a serious incident that may pose an ongoing threat to members of the college community, a Timely Warning notice is sent to all students and employees on campus by one or more of the following methods:

- RAVE: A secure emergency notification service that allows the college to send information and instructions simultaneously to individuals through landline phones, cellular phones, text messaging, and e-mail. Students, faculty, and staff must submit emergency contact information through the Garnet Gateway: bates.edu/garnet-gateway
- Directed communications by email: Bates College email system alerting students, faculty, and staff

¹⁴ Aggravated assault and sex offenses are considered on a case-by-case basis, depending on the facts of the case and the information known by Campus Safety.

- Campus Safety website: bates.edu/campus-safety
- Bates College website: bates.edu
- Bates Emergency website: emergency.bates.edu
- WRBC: College radio station, 91.5 FM
- Face-to-face communication

A copy of the Timely Warning or emergency notification will be filed in the corresponding case file in the Campus Safety reporting software.

The Bates College Campus Safety Department also maintains a daily crime and fire log that contains all crimes and fires reported to the department. These can be viewed on the Campus Safety website at bates.edu/campus-safety.

The decision to issue a Timely Warning or emergency notification shall be made on a case-by-case basis in compliance with the Clery Act. The decision is made by the Director of Campus Safety or their designee considering all available facts, whether the crime is considered a serious or continuing threat to students or employees, and the possible risk of compromising law enforcement efforts.

Campus Emergency Response & Evacuation Procedures

Emergency Preparedness

The college's Emergency Operations Plan includes information about Crisis Communications Management plans. College departments are responsible for developing contingency plans and continuity-of-operations plans for their staff and areas of responsibility. Bates conducts emergency exercises each year, including tabletop exercises, field exercises, and tests of the campus notification systems. These procedures are designed to assess and evaluate the emergency plans and capabilities of the college.

Campus Safety officers and supervisors have received training in incident command and responding to critical incidents on campus. When a serious incident poses an immediate threat to the campus, the first responders to the scene are usually the Bates College Campus Safety Department, the Lewiston Police Department, and the Lewiston Fire Department. They typically respond and work together to manage the incident. Depending on the nature of the incident, other Bates College departments and other city, federal, and private agencies could also be involved in responding.

All members of the Bates College community are informed on an annual basis that they are required to notify Campus Safety of any situation on campus that involves a significant emergency or danger that may pose an immediate or ongoing threat to the health and safety of students and/or employees. Campus Safety has the responsibility of responding to, and summoning the necessary resources to mitigate, investigate, and document any situation that may cause a significant emergency or danger. In addition, Campus Safety is responsible for responding to such incidents to determine if the situation does in fact pose a threat to the community. If that is the case, federal law requires that the institution immediately notify the campus community or the appropriate segments of the community that may be affected by the situation.

In the event of a confirmed serious incident that poses an immediate threat to members of the Bates College community, Campus Safety will immediately notify the Senior Emergency Response Group (SERG).

If Campus Safety confirms an emergency or dangerous situation that poses an immediate threat to the health or safety of the Bates College community, Campus Safety Supervisors or designee will issue a timely warning. SERG will then determine follow-up communications, including message content and which systems described below to use when notifying either the entire college community or specific groups and locations.

SERG will, without delay and taking into account the safety of the community, determine the content of the notification and initiate the notification system, unless issuing a notification will, in the judgment of the first responders (including, but not limited to Campus Safety, the Lewiston Police Department, the Lewiston Fire Department, and Emergency Medical Services) compromise efforts to assist a victim or to contain, respond to, or otherwise mitigate the emergency.

Emergency Notification System

The Bates College Emergency Notification System (RAVE) uses a secure, web-based service to selectively store electronic contact information provided by students, faculty, and staff that enables the college to communicate information and instructions in the event of an emergency. Emergency messages may be sent simultaneously via voicemail, email, and/or text messaging to all numbers and addresses on file for each person. The benefits of the alert service are its immediacy and direct access to members of the college community through multiple points of contact.

This service complements other mechanisms the college has in place to respond to emergencies and relay critical information using the most appropriate channels. These include email; the Bates website; personal notification within buildings; and electronic screens in campus buildings.

Emergency Response and Evacuation Testing Procedures

Bates College conducts an annual exercise of the Campus Emergency Operations Plan. This exercise — tabletop, functional, or live — includes the membership of the Senior Emergency Response Group, Campus Safety Officers and representatives of local response agencies, as appropriate to the scenario.

Evacuation (fire) drills are coordinated by the Environmental Health and Safety Office once per semester for all residential facilities. Students learn the locations of the emergency exits in the buildings and are provided guidance about the direction they should travel when exiting each facility for a short-term evacuation. Each building has a [designated assembly](#) area that is communicated to students, identified on in building placards, and again communicated in the email notification of the fire alarm drill each semester. Additionally, a text alert is sent to residents of the building through the RAVE emergency alert system 5 minutes prior to fire alarm drills with a reminder of the assembly location.

Residents are not advised in advance about the designated locations for long-term evacuations because those decisions are affected by time of day, location of the building being evacuated, the availability of the various designated emergency gathering locations on campus, and other factors such as the location and nature of the threat. In both cases, Campus Safety and Housing staff on the scene will communicate information to students regarding the developing situation or any evacuation status changes.

Emergency Procedures

A Senior Emergency Response Group (SERG) is established to determine the existence and nature of an emergency affecting the college (including weather emergencies), and to initiate appropriate action and communication regarding such emergencies. SERG will continue to serve during the emergency, to coordinate the college's efforts, and to advise the college President on decisions regarding the emergency.

SERG Operating Procedures

- Following consultation with the Director of Campus Safety, the President or designee will determine whether to convene SERG. In the President's absence, the Director of Campus Safety will activate the SERG committee. In the event of imminent danger to individuals or

groups, public safety procedures will take precedence over immediately activating SERG.

- Bates Campus Safety may contact the SERG and other necessary personnel.
- If SERG is convened, they will meet in an appropriate location; virtually; or through conference calls during the emergency or crisis.
- Immediate objectives of SERG, once convened:
 - Identify the nature and scope of the emergency;
 - Establish priorities and coordinate crisis response efforts;
 - Activate the emergency telephone system in the event of a power failure. If this system fails, activate the campus phone tree or courier system;
 - Interact with outside agencies including, but not limited to, the American Red Cross, law enforcement, fire department, and the Emergency Management Agency;
- Determine the times and means to report efforts and progress to the campus community.

Depending on the nature of the emergency, additional members of SERG may be added, including, but not limited to, the head of Bates Emergency Medical Service and the Director of Health Services.

Weather Emergencies

At the announcement of a weather emergency, the Vice President for Finance and Administration and Treasurer will determine whether or not college services are to be open or closed. The announcement will be made on the college's web page and through the emergency notification service. If college offices are closed, only those personnel already defined in advance by department directors as "essential personnel" should report for work; no other personnel should report. "Essential" personnel will be needed only to preserve safety, health, and maintenance functions. If college offices are declared open, all personnel should assume that they report to work.

Special events and programs (including nonresident summer programs) will be canceled if the college closes its services; while an effort to provide appropriate notice will be made when canceling a specific event, the assumption shall be that if college offices are closed, then the special event will be canceled.

Evacuation Procedures

In the event that a life-threatening emergency makes it necessary to evacuate specific buildings, Campus Safety will coordinate such efforts with emergency responders as follows:

- At the direction of SERG or emergency personnel (police or fire dependent on circumstance), the building's fire alarm will be activated and occupants will evacuate according to established plans.
- Occupants will be directed to identified assembly areas or other designated safe zone.
- If the evacuation is prolonged, Bates College Administrators will arrange for temporary relocation as necessary.
- No one will be able to reenter the building without the express permission of emergency personnel.

Shelter-in-Place Procedures

If an incident makes the buildings or areas around your location unstable, or if the air outdoors becomes dangerous due to toxic or irritating substances, it is usually safer to stay indoors, because leaving the area may expose you to that danger. Thus, to “shelter in place” means to make a shelter of the building that you are in. With a few adjustments this location can be made even safer and more comfortable until it is safe to go outside.

Basic Shelter-in-Place Guidance

If an incident occurs and the building you are in is **not** damaged, stay inside and away from doors and windows until you are told it is safe to come out. If your building is damaged, take your personal belongings and follow the evacuation procedures for the building (close your door, proceed to the nearest exit, use the stairs instead of the elevators). Once you have evacuated, quickly seek shelter at the nearest college building. If Campus Safety, police, or fire department personnel are on the scene, follow their directions.

How You Will Know to Shelter in Place

A shelter-in-place notification can come from several sources, including Campus Safety, Residence Life staff, other college employees, Lewiston Fire and/or Police departments, or RAVE text alert. Notification of a need to shelter in place also may come over the radio and television. In addition, the college can announce the need to shelter in place on campus through any of the communications methods already mentioned.

How to Shelter in Place

No matter where you are, the basic steps to shelter in place generally remain the same. Should the need ever arise, follow these steps unless instructed otherwise by local emergency personnel.

- Remain calm.
- If you are outside, seek cover in the nearest building. Do not wait until you see or smell the hazard to seek shelter. Resist the urge to go outside and “check it out”.

- Once inside, find an interior room or hallway and await further instructions. Stay away from exterior windows.
- Close and lock all exterior doors and windows (to avoid inadvertent opening).
- Turn off heating, cooling and ventilation systems.
- If you are inside, stay there, even if you do not normally work or reside in that building.
- Do not leave until an “all clear” is received.

Lockdown or Secure-in-Place Procedures

In certain situations, likely involving an immediate physical threat on campus, College officials may direct you to LOCKDOWN or SECURE in place.

A lockdown may be instructed during situations such as the presence of a hostile or armed intruder on campus. A lockdown requires locking doors, windows, and barricading oneself to block entry to a campus facility, a classroom, or to an office suite. The purpose of a secure in place is to create a secure physical location where a threat may be physically prevented to entering spaces — to lock down the campus and secure community members in place. This also facilitates law enforcement activity. When it is necessary to secure in place, you should:

- Remain calm
- If you are outside, seek cover in the nearest unlocked building. Do not wait until you see the danger to seek shelter. Resist the urge to go outside and “check it out”.
- If the buildings nearest to you have locked exterior doors, continue moving away from the danger and seek cover. Move to another building or leave campus if it is safe to do so.
- Once inside, find an interior room and lock or barricade the doors.
- Turn off lights, silence phones, close blinds, and move away from windows. This avoids creating indicators that the intruder may see or hear to detect people.
- Await further instructions.
- Do not leave until an “all clear” is received.

Once in a secure space, the space needs to remain secure. If there are individuals outside the secured door that seek to enter, they may endanger you and others. Use good judgement.

Missing Student Notification Policy for Students Who Reside in On-Campus Housing

If a member of the Bates community has reason to believe that a student who resides in on-campus housing is missing, they should immediately notify Campus Safety at 207-786-6111. Campus Safety will immediately initiate an investigation.

After investigating the missing person report, should Campus Safety determine that the student is missing and has been missing for more than 24 hours, Campus Safety will notify the Lewiston Police Department and the student's emergency contact no later than 24 hours after the student is determined to be missing. If the missing student is under the age of 18 and is not an emancipated individual, Bates College will notify the student's parent or legal guardian immediately after Campus Safety has determined that the student has been missing for more than 24 hours.

In addition to registering an emergency contact, students residing in on-campus housing have the option to designate, confidentially, an individual to be contacted by Bates College in the event that that student is determined to be missing for more than 24 hours. In such cases, Bates will notify the designated contact no later than 24 hours after the student is determined to be missing. Students who wish to identify a confidential contact can do so through the Bates College Student Affairs Office.

The College Alcohol and Drug Policy

In compliance with the Drug-Free Schools and Communities Act, Bates College prohibits illicit drug and alcohol use or distribution by students and employees. Violations are subject to disciplinary action up to termination or expulsion, alongside applicable legal penalties. Bates College observes all laws governing the use of alcoholic beverages and cannabis within the State of Maine and does not condone violation of these laws by any student at any time. Students are held personally responsible for complying with all aspects of Maine laws and Bates alcohol and Cannabis policy.

Violating the college's alcohol and cannabis policy

The prohibitions of the Bates Student Conduct Code and Maine law include, but are not limited to, the following:

- The sale of alcoholic beverages by any person who does not have a license to sell such beverages in full force and effect at the time of the sale;
- The sale of alcoholic beverages by any person to a person who has not attained the age of 21 years;
- Consumption or purchase of alcoholic beverages by any person who has not attained the age of 21 years;
- The furnishing of, procurement of, or delivery of alcoholic beverages to a person who has not attained the age of 21 years;
- The furnishing of, procurement of, or delivery of alcoholic beverages to a person who is intoxicated;
- The presentation of any written or oral evidence of age which is false, fraudulent, or not a person's own for the purpose of ordering, purchasing, or attempting to purchase or otherwise procuring or attempting to procure intoxicating liquor by a person who has not attained the age of 21 years;
- Transportation by automobile within the state of Maine of alcoholic beverages by any person who has not attained the age of 21 years; and
- Possession or consumption of hard alcohol or any beverage containing hard alcohol by any student on the premises of the college, at any college-sponsored event, or while the student is engaged in a college-related activity.

Cannabis use remains illegal under federal law and there remains evidence that the use and abuse of cannabis can impact one's health. As such, even though adult possession and use of cannabis is not prohibited by Maine law, the College prohibits cannabis use, possession, and/or distribution of cannabis on campus except for those with a medical written certification that is valid in the state of Maine.

For those with a valid written medical certification, all other campus policies (such as the prohibition on smoking in residence halls) still apply. If medical cannabis is used in a manner that violates other campus policies, the cannabis and paraphernalia may be subject to confiscation and the student may be subject to a conduct violation.

The Alcohol and Cannabis Policy outlines two types of violations: Level I Violations and Level II Violations. Level I Violations are lower-level violations while Level II Violations are more egregious in nature.

Level I Violations are resolved through the Misconduct Resolution Meeting process, and typically result in a warning letter sent to the student involved. Level I Violations may also result in educational sanctions, referral to support resources, or other sanctions for minor cases of misconduct at the discretion of the Misconduct Resolution Coordinator.

As with all misconduct cases, documentation will be sent to the student, and saved in the student's disciplinary file. Accumulation of three Level I Violations will result in a Level II Violation.

First Level II Violation

Level II Violations are resolved through the Misconduct Resolution Meeting process, and typically result in a warning letter sent to the student. Level I Violations may also result in educational sanctions, referral to support resources, or other sanctions for minor cases of misconduct at the discretion of the Misconduct Resolution Coordinator.

As with all misconduct cases, documentation will be sent to the student, and saved in the student's disciplinary file.

Second Level II Violation

A second Level II Violation is typically resolved through the Misconduct Resolution Meeting process. In addition to a warning letter, the student may be referred to the college drug and alcohol counselor, and/or assigned an educational sanction. If appropriate or necessary, the student may be referred to additional support related to the violation.

As with all misconduct cases, documentation will be sent to the student, and saved in the student's disciplinary file. For a second Level II Violation, a copy of the warning letter will be sent home to the student's parent(s)/guardian(s).

At the misconduct resolution meeting, the student will be notified that an additional Level II Violation will result in Disciplinary Notice, where a one semester suspension is held in abeyance.

Third Level II Violation

A third Level II Violation will result in Disciplinary Notice, where a one semester suspension is held in abeyance. An additional Level II Violation during the Notice period results in immediate suspension.

Illegally possessing, using, or distributing any scheduled drugs

Unlawful possession, distribution, or use of illegal drugs and narcotics, including but not limited to amphetamines, cocaine, heroin, and LSD, renders a student liable to disciplinary action, including

confiscation of materials, student conduct action up to and including suspension and dismissal, and/or referral to local police authorities. Cases of this nature are typically adjudicated through the [Disciplinary Resolution Process](#).

Sanctions that may be imposed by the committee include but are not limited to:

Warning. Warnings involve letters stored in the student's file documenting a finding of responsibility for a violation. Letters are retained in the student's confidential files until graduation, and may be copied to Athletics administrators, parent(s)/guardian(s), or other relevant college personnel. Warnings include, but are not limited to, letters issued for Level I and Level II violations of the Alcohol and Cannabis Policy. Warnings are not reported outside the college, and do not appear on a student's official transcript.

Censure. Penalties involving censure are available to the Misconduct Resolution Coordinator at a Misconduct Resolution Meeting, the Assistant Dean, and to the Senior Associate Dean of Students. The term "censure" applies to a variety of actions resulting in letters to a student's file and/or loss of privileges and may include any one or any combination of the following actions:

- Loss of the privilege of participating in any public function (e.g., literary, dramatic, forensic, radio, television, musical, or athletic) wherein the participant will be thought of as a representative of Bates College;
- Loss of housing or dining privileges on campus;
- Loss of privilege of participating in social or ceremonial events on campus;
- Loss of the privilege of maintaining a motor vehicle on campus;
- A requirement that a student resign membership in any or all offices, elected or appointed, held in campus organizations;
- A letter from either the Misconduct Resolution Coordinator with a copy to the parent(s) or guardian(s);
- Any other restriction (except notice, suspension, or dismissal) that seems appropriate to the violation.

Required Action. Penalties that require a particular action of a student are available to the Misconduct Resolution Coordinator at a Misconduct Resolution Meeting, the Assistant Dean, the Senior Associate Dean of Students, and to the Sanctioning Panel. This may include requests to attend various forms of counseling or educational sessions, or meetings with staff in relevant offices to the violation. A student may be instructed to engage in some form of community service (this service may take place either on or off the Bates campus, or both). A student may also be required to pay a monetary fee for damage they caused to college property or inappropriate use of community resources. The Panel, Deans, or Misconduct Resolution Coordinator may either specify the terms of such counseling, education or service, or may designate another individual or body to determine appropriate terms.

Disciplinary Notice. The term "disciplinary notice" means that a sanction of suspension or dismissal is held in abeyance and will take effect only after the student is found to have committed a further violation of the same type for which the student was placed on notice. If a student already on disciplinary notice comes before the Office of Community Standards for an additional instance of misconduct of the same type and is found to have violated the Code of Student Conduct again, the first penalty held in abeyance now goes into effect. There may also be additional sanctions in the additional

offense. Disciplinary notice is not recorded on the student's transcript, but will remain in the student's confidential file until graduation.

Suspension. The Sanctioning Panel in the Disciplinary Resolution Process may suspend a student for a specified period of time, or indefinitely. A student may also enter a period of suspension through Voluntary Agreement. There may be specific conditions to a student's readmission to the College associated with a suspension sanction. A student who is suspended must leave the campus and may not return until the suspension is concluded. Unless otherwise specified, the suspension goes into effect immediately (within two class days) and the student is dropped from all courses. In some cases, the Panel may decide to defer the suspension until the end of the semester. Suspension will be noted on the student's official transcript, but only during the time that it is in effect.

Dismissal. The Sanctioning Panel in the Disciplinary Resolution Process may dismiss (i.e., expel) a student. This severs with finality a student's connection with the College. Dismissal will be noted on the student's permanent record and on the student's official transcript.

Employee violations of these policies will be reported to Human Resources. Employees are subject to appropriate sanctions that may include referral to standing procedure for termination of employment.

Unlawful possession, use, or distribution of illicit drugs or alcohol may involve the above sanctions, according to the severity of the infraction and the kind of involvement of the employee. Employees involved may be required to undergo professional assessment by a substance-abuse professional designated by the college to determine whether they are involved in substance abuse or addiction. In case of dependency, the college may treat the case as a disability.

Support Resources for Alcohol or Drug Abuse

Bates College has several options available to students and staff members who need to address alcohol and other drug abuse issues.

Peer Health Education Program

Throughout the academic year, health education programming around well-being related topics, including alcohol and drugs, is offered to the campus community via the Peer Health Education Program. Supervised and trained by professional staff in the Office of Community Standards and Health Services and Student Well-being, they offer a variety of programs tailored to relevant community health concerns.

HealthyBates 101 & 102

Every first-year student at Bates is required to complete an online alcohol education program prior to arriving on campus. Grounded in the evidence-based substance abuse interventions of motivational interviewing (MI), this custom program facilitates goal setting around social choices inclusive of alcohol use. In combination with goal setting, students complete an education module that provides key information required to make safe choices around alcohol use. The introductory module for the course is completed prior to the student's arrival on campus in August. During the second semester, first year students revisit the program through review of informational content and goals. The process allows students to re-evaluate goals and choices to remain connected to the values they brought to college. The program also provides referral information to on campus resources when indicated. Combining factual information on alcohol with evidence-based intervention strategies, students receive broad based education in alcohol use.

Employee Assistance Program (EAP)

All employees of Bates College, regardless of their benefit status, are eligible to use the services of the EAP program. Bates College cares about the health and well-being of its employees and recognizes that a variety of problems can disrupt their personal and work lives. Through the Employee Assistance Program (EAP), Bates College provides confidential access to professional counseling services for help in confronting such personal problems as alcohol and other substance abuse, marital and family difficulties, financial or legal troubles, and emotional distress. The EAP is also available to employees' immediate family members offering problem assessment, short-term counseling, and referral to appropriate community and private services.

Health Education Counseling

The Health Service and Student Well-Being office provides an Alcohol Tobacco and Other Drug Counselor (ATOD) for students who are referred for alcohol and other drug treatment through the disciplinary process.

Counseling & Psychological Services (CAPS)

Personal counseling and psychological services are available for students at Counseling & Psychological Services (CAPS) and, by referral, elsewhere. Services include consultation, assessment, counseling, psychiatric evaluation and/or therapy. There is no charge for appointments with on-campus counselors, psychologists, or psychiatric providers. Typically, services are offered on an appointment basis. However, emergencies requiring immediate attention can exist for our students and our same day crisis services are designed to assist these students. Every effort will be made to see students with urgent concerns as soon as possible. For after-hours needs, Bates contracts with ProtoCall, a specialty telephonic behavioral health services provider.

2025 Annual Fire Safety Report

If fire occurs in a Bates College building, community members should immediately notify Campus Safety at 207-786-6111. Campus Safety will initiate a response by contacting the Lewiston-Auburn 911 Communications Center. If a member of the Bates community finds evidence of a fire that has been extinguished, and the person is not sure whether Campus Safety has already responded, the community member should immediately notify Campus Safety to investigate and document the incident.

Fire alarms alert the campus community to a potential hazard and community members indoors are required to heed that warning and evacuate the building immediately upon hearing a fire alarm in a facility. Avoid using an elevator and use the nearest stairwell and/or exit to leave the building immediately. Community members should familiarize themselves with the exits in each building they use.

Campus Safety publishes this fire safety report in accordance with the Clery Act, which contains information with respect to the fire safety practices and standards for Bates College. This report includes statistics concerning:

- number of fires;
- cause of each fire;
- number of injuries and deaths related to a fire; and
- cost of property damage caused by a fire.

Fire Protection Equipment/Systems

Most Bates College buildings are equipped with automatic fire detection and alarm systems that are constantly monitored at the Lewiston-Auburn 911 Communications Center. Refer to attached “Student Housing Fire Safety System” chart for information about fire detection, notification, and suppression systems in each residence hall.

Fire Evacuation Plan

All faculty, staff, and students are required to evacuate a building when its alarm has sounded. Proceed carefully to the nearest exit and go directly to the predetermined assembly site. The last person exiting a room should close the door en route to the closest exit. If smoke hampers your means of egress, find an alternative route.

Never use an elevator to evacuate a building, as smoke will rise into the elevator shaft, placing everyone inside at serious risk. If you are unable to stay in your office or room, please go to the nearest staircase and wait for assistance.

Do not re-enter the building until the fire alarm has been silenced and Campus Safety or the Lewiston Fire Department has indicated that the building is safe to reoccupy. Inform Campus Safety if anyone has been injured or isn’t accounted for.

Fire Reporting Procedures

Use the following procedures if you discover a fire:

- Proceed to the nearest fire alarm pull station and call either Campus Safety at 207-786-6111 or municipal emergency dispatch at 911.
- Provide the dispatch officer the following information: your name, the building name, the fire location, and if there are any injuries.
- If the fire is small, use a fire extinguisher — but only if you have been properly trained by Bates’ Environmental Health and Safety Department.

Emergency Evacuation Procedures for Individuals with Disabilities

- If the occupant, resident, or visitor is located on the ground floor of the building, exit through the closest appropriate means of egress.
- If the occupant, resident, or visitor is located above or below the ground floor, do not use the elevator. Please go to the nearest staircase, call 911 or Campus Safety at 207-786-6111 to let them know where you are and wait for assistance.

Housing Policies

Cooking

Cooking is among the most frequent causes of residential fires. Cooking is not permitted in student rooms. Cooking may only be done in designated kitchen areas and must not be left unattended. Appliances with exposed burners (e.g., hot plates) are not permitted in residence halls. Items with enclosed heating elements may be used in kitchen areas. These include, but are not limited to, appliances such as microwaves, toasters, toaster ovens, electric frying pans, deep-fat or air fryers, grilling machines, waffle irons, and slow cookers. Alarms set off by cooking in rooms are subject to fines.

Flammable Materials

Candles, incense, or any source of open flame or ignition are prohibited in student residences. Highly flammable materials such as gasoline, camp-stove fuel, paint solvents, propane, butane, or charcoal lighter fluid may not be stored or used in student residences and will be removed if found.

Electrical Appliances

Electric-line load limitations prohibit the use of heavy-demand appliances in student rooms. One small refrigerator per resident is permitted in student rooms or in common areas. In no case may a refrigerator exceed 3.0 cu. ft. or operate at more than 350 kWh. Larger refrigerators, keg refrigerators, coolers, air conditioners, and space heaters are prohibited and will be removed if found.

Light-demand electrical items, such as radios, stereos, alarm clocks, and televisions may be used within the limitations of safe operating conditions. If in doubt about multiple appliance usage, please contact the Facilities Services electrical staff for guidance. All electrical items should be unplugged if the student room will not be occupied for an extended period of time such as break periods.

Electrical Safety

Any electrical device that is modified after purchase is prohibited. Students may not add wiring, remove or alter existing wiring, or use unsafe wiring devices. Outlet expanders are prohibited and will be confiscated. Thin-wire extension cords used for any purpose other than extending a single low-wattage item will be removed. Overloading thin extension cords can lead to overheating and fire. Do not plug power strips into thin-wire extension cords. In no instance should power strips be plugged into other power strips.

In no instance may current-carrying wire be run under carpets or be taped across walkways, door thresholds, or through doorways where pinching or other damage can result. Fines may be issued for unsafe wiring practices.

Fire Protection and Combustible Materials

A fire in a college residence is a disaster that can be avoided by the mutual efforts of residents and

staff. The misuse of fire-safety equipment (e.g., fire escapes, fire extinguishers, smoke detectors, sprinkler systems, and fire alarms) is not permitted and is a violation of public safety laws in the state of Maine.

Smoke detectors, sprinkler heads, and fire alarms may not be covered with tapestries or other materials. Nothing may be attached to or hung from sprinkler pipes or sprinkler heads. A fine will be assessed along with the repair/replacement cost of any life-safety items tampered with. All students should become familiar with policies regarding fire and life safety, administered by the Office of Environmental Health and Safety.

Smoking

Smoking, the burning of any type of pipe, cigar, cigarette, or similar product, and vaping are all prohibited in all campus buildings including residence halls and houses and their stairwells, porches, or garages. Smoking is also prohibited within 50 feet (approximately 20 paces) of all campus buildings, including residences.

The presence of ash-filled ashtrays and/or hookahs and water pipes will be considered proof of smoking in rooms and will be reported to Campus Safety and the Student Affairs Office. Water pipes and hookahs may be confiscated.

- First violation will result in a warning.
- Second violation will result in a fine of \$150.
- Third violation will result in the individual being moved to a different building on campus and a mandatory meeting with case management.

Fire Safety Tips

Fire Drills/Evacuation

- Never assume it's a false alarm.
- Know the safest and quickest route out of your building.
- Always move as quickly and safely as you can.
- Showers are not safe places during a fire.
- Know where to gather to get a head count.

Fire Safety Equipment

- Never hang items on or cover sprinkler piping or heads.
- Know locations of the nearest fire alarm pull station.
- Never tamper with or cover smoke detectors.

Prevention

- Maintain a clear path through your room to the door.
- Never cook in rooms.
- Never use candles.
- Avoid placing extension cords under carpeting.
- Always plug personal items into power strips.
- Avoid using thin-wire extension cords.
- Outlet adapters are prohibited.
- Flammable materials and combustion source devices are prohibited in residence halls.
- Always keep hallways free of personal items and trash.

A daily fire log is available for review 24 hours a day on the Campus Safety website at <http://bates.edu/campus-safety> or at Campus Safety, 245 College Street, from 8 a.m. to 4 p.m. Monday through Friday. The fire log typically includes the nature, date, time, and general location of fire-related incidents.

Student Housing Fire Safety System

January 1, 2025–December 31, 2025

Student Housing	Fire Alarm Monitored by	Full Sprinkler System	Smoke or Heat Detection	Fire Extinguisher Devices	Evacuation Plan Placards	Number of Fire Drills each Academic year
84 Bardwell St.	BCS		Both	X	X	2
101 Bardwell St.	BCS		Both	X	X	2
96 Campus Ave.	LFD	X	Both	X	X	2
80 Central Ave.	BCS		Both	X	X	2
Gillespie Hall	LFD	X	Both	X	X	2
356 College St.	BCS		Both	X	X	2
10 Frye St.	LFD	X	Both	X	X	2
100 Nichols St.	BCS		Both	X	X	2
108 Nichols St.	BCS		Both	X	X	2
94 Russell St.	BCS		Both	X	X	2
Chase House	LFD	X	Both	X	X	2
Cheney House	LFD	X	Both	X	X	2
Chu Hall	LFD	X	Both	X	X	2
Clason House	LFD	X	Both	X	X	2
Frye House	LFD	X	Both	X	X	2
Frye St. Union	LFD	X	Both	X	X	2
Hacker House	LFD	X	Both	X	X	2
Hayes House	LFD	X	Both	X	X	2
Herrick House	LFD	X	Both	X	X	2
Hopkins House	LFD	X	Both	X	X	2
John Bertram Hall	LFD	X	Both	X	X	2
Kalperis Hall	LFD	X	Both	X	X	2
Milliken House	LFD	X	Both	X	X	2
Mitchell House	LFD	X	Both	X	X	2
Moody House	LFD	X	Both	X	X	2
Moulton House	LFD	X	Both	X	X	2
Nash House	LFD	X	Both	X	X	2
Page Hall	LFD	X	Both	X	X	2
Parker Hall	LFD	X	Both	X	X	2
Parsons House	LFD	X	Both	X	X	2
Pierce House	LFD	X	Both	X	X	2
Rand Hall	LFD	X	Both	X	X	2

Rzasa House	LFD	X	Both	X	X	2
Small House	LFD	X	Both	X	X	2
Smith Hall	LFD	X	Both	X	X	2
Stillman House	LFD	X	Both	X	X	2
Turner House	LFD	X	Both	X	X	2
Webb House	LFD	X	Both	X	X	2
Wentworth Adams Hall	LFD	X	Both	X	X	2
Whittier House	LFD	X	Both	X	X	2
Wilson House	LFD	X	Both	X	X	2
Wood St. House	LFD	X	Both	X	X	2

Student Housing Fire Log

January 1, 2025–December 31, 2025

Student Housing	No. of Fires	Date	Time	General Location	Cause	Injuries	Deaths	Property Damage	Cost of Damage
Student Housing	0	NA	NA	NA	NA	0	0	0	0