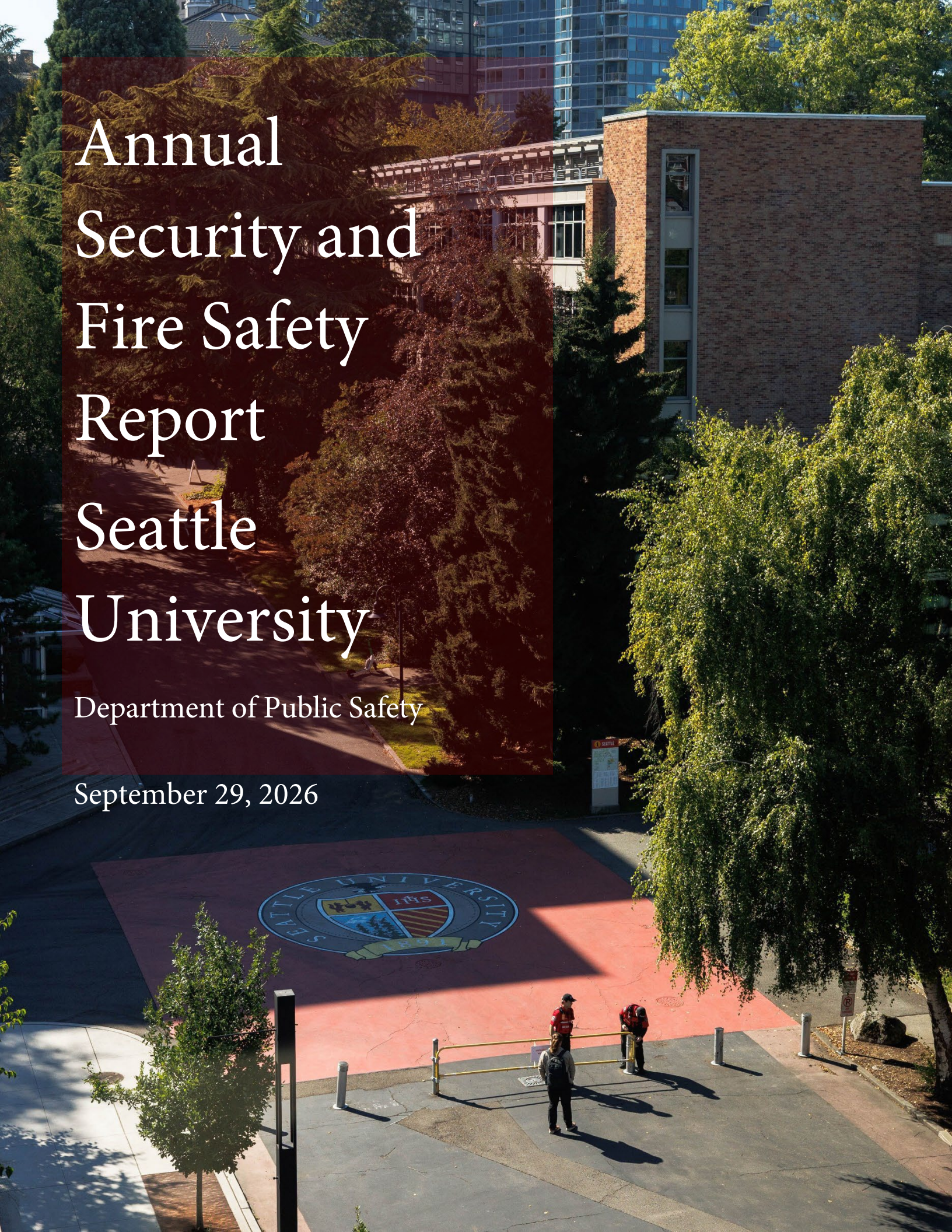
Annual Security and Fire Safety Report

Seattle University

Department of Public Safety

September 29, 2026



1 INTRODUCTION 5
2 THE DEPARTMENT OF PUBLIC SAFETY 5
2.1 Department of Public Safety Staff 6
2.2 Campus Public Safety Services 6
3 CAMPUS CRIME PREVENTION INFORMATION 7
3.1 Our Partnership: "Community Safety is Everyone's Responsibility" 7
3.2 Campus Emergency Blue Light Phone Program 8
3.3 Personal Safety 8
3.3.1 In General 8
3.3.2 Protecting Your Personal Property 8
3.3.3 Safety at Home – On & Off Campus 9
3.3.4 Safety in Your Residence Hall 10
3.3.5 Safety When Walking & at Transit Stops 10
3.3.6 Safety When Driving 11
3.4 Facilities Access 11
3.4.1 In General 11
3.4.2 Residential Access 12
4 OFF-CAMPUS BEHAVIOR POLICY 13
5 CRIME PREVENTION EDUCATION 13
5.1 New Student Orientations 13
5.2 New Employee Orientations 13
5.3 Integrity Formation 14
5.4 Campus Community Crime Prevention 14
5.5 Personal Safety 14
5.6 Self-Defense Classes (Strategic Living) 14
5.7 Clothesline Project 14
5.8 Take Back the Night 14
5.9 Step UP! 14
5.10 One Love 15
5.11 Active Shooter Training, Planning, and Response 15
5.12 Inclusive Voices for Change 15
5.13 Sexual Assault Awareness Month (SAAM) 15
6 SECURITY POLICIES, SERVICES AND PROCEDURES 16

6.1 Reporting Emergencies & Crime on Campus 16
7 FIRE SAFETY 17
7.1 On Campus Residences 17
7.2 Campus Residence Fire Systems 18
7.2.1 Archbishop Murphy Apartments (All Buildings) 18
7.2.2 Bellarmine Residence Hall 18
7.2.3 Campion Residence Hall 18
7.2.4 Chardin Residence Hall 18
7.2.5 Douglas Apartments 19
7.2.6 Logan Court Townhomes (1&2) 19
7.2.7 Kolvenbach Residences 19
7.2.8 Vi Hilbert Hall 19
7.2.9 Xavier Residence Hall 19
7.2.10 Yobi Apartments 19
7.2.11 Cornish Commons (2025 Terry Ave) 19
7.3 Fire Statistics 20
7.3.1 First Hill Campus Fire Statistics (1/1/2023 - 12/31/2025) 20
7.3.2 South Lake Union Campus Fire Statistics (1/1/2023 - 12/31/2025) 21
7.4 Fire Drills 21
7.4.1 First Hill Campus Housing 21
7.4.2 South Lake Union Campus Housing 21
7.5 Future Fire System Improvements 21
7.6 General Fire Safety Procedures 21
7.6.1 General Fire Evacuation Procedures 21
7.6.2 General Fire Shelter-in-Place Procedures 22
7.7 Student Housing Fire Evacuation Procedures 22
7.7.1 Archbishop Murphy Apartments (All Buildings) 23
7.7.2 Bellarmine Residence Hall 24
7.7.3 Campion Residence Hall 25
7.7.4 Chardin Residence Hall 26
7.7.5 Douglas Apartments 27
7.7.6 Kolvenbach Residences 28
7.7.7 Logan Court Townhomes (1&2) 29

7.7.8 Vi Hilbert Hall 30
7.7.9 Xavier Residence Hall 32
7.7.10 Yobi Apartments 33
7.7.11 Cornish Commons (2025 Terry Ave) 34
8 POLICY PROHIBITING SEX-BASED HARASSMENT, DISCRIMINATION, AND RETALIATION 36
8.1 Appendix A: Resolution Process 62
9 ALCOHOL AND OTHER DRUG USE PREVENTION PROGRAM 106
9.1 State and Federal Laws & Sanctions Concerning Drugs and Alcohol 122
10 SEATTLE UNIVERSITY FIREARMS AND WEAPONS POLICY 126
11 SEX OFFENDER REGISTRY AND ACCESS TO RELATED INFORMATION 127
12 MISSING STUDENT NOTIFICATION POLICY AND PROCEDURES 128
13 TIMELY WARNING NOTIFICATION POLICY 130
14 EMERGENCY PROCEDURES 132
14.1 Reporting Health and Safety Emergencies 132
14.2 Emergency Notification Policy 132
14.3 Emergency Operations 133
14.4 General Building Evacuation Plan 133
14.5 General Building Shelter-in-Place Plan 134
14.6 Violent Intruder Plan 135
14.7 Campus-Wide Drills 135
14.8 Emergency Procedures PDF 136
15 HAZING PREVENTION AND RESPONSE 138
16 ANNUAL DISCLOSURE OF CRIME STATISTICS 140
16.1 Campus Security Authorities (CSAs) 141
16.2 Clery Act Reportable Offenses 142
17 CAMPUS CRIME STATISTICS 145
17.1 First Hill Campus – Clery Crime Statistics 145
17.1.1 First Hill Campus – Clery Geography Map 147
17.2 South Lake Union Campus – Clery Crime Statistics 148

1 INTRODUCTION

Welcome to Seattle University – Seattle University is a Jesuit and independent, coeducational liberal arts institution located within a metropolitan setting. The campus abuts both residential and business districts of the city. The University is a community of over 8,800 people working and studying (approximately 2,400 reside on campus) within the borders of a 50-acre campus centered at 901 12th Avenue, Seattle, WA. While the University is committed to ensuring a safe campus, it experiences many of the same crime problems that occur in the surrounding metropolitan area. The information in this report is provided to assist you in making decisions and developing habits that will reduce the possibility of you being a victim of crime, whether here at SU or in the surrounding community. This report is prepared annually by the Department of Public Safety to include all current policies, processes, resources, statistics, and other information relating to campus safety.

Unless otherwise noted, all policies, procedures, resources, and other information contained in this report applied to Seattle University's campus during the times in which it was in operation. As of the publishing date of this report, Seattle University has two campuses: First Hill Campus and South Lake Union Campus.

2 THE DEPARTMENT OF PUBLIC SAFETY

The Executive Director of Emergency Management and Public Safety is responsible for the Department of Public Safety (also referred to in this report as DPS, Campus Public Safety, or Public Safety) and reports to the Senior Vice Provost for Academic and Student Affairs. The DPS office is located on campus in the lower-level of 1313 E. Columbia St. (the "Columbia Building"). The office is staffed 24 hours a day, year-round by professional Campus Public Safety Officers and Dispatchers.

While the laws of the State of Washington grant private landowners broad authority in controlling their grounds, DPS is not a commissioned law enforcement agency. As a private institution in the state of Washington, SU may not maintain a police force. Therefore, DPS at Seattle University is a campus public safety department oriented toward life safety, crime prevention and physical security. The department is staffed with a combination of unarmed, non-commissioned, full-time public safety professionals and part-time student personnel.

DPS officers and administrators do not have arrest authority. The Seattle Police Department (SPD) is responsible for local law enforcement response, investigation, and police reporting on campus. DPS does not have any written memoranda of understanding (MOU) with any law enforcement agency but does maintain a working relationship with the Seattle Police Department and State and Federal law enforcement agencies as appropriate.

On occasion, such as a large public event on campus, the University coordinates with the Seattle Police or other law enforcement agencies for additional police presence. This arrangement allows the University prompt response from law enforcement officials when circumstances may require. DPS tracks the University's crime data, assists in law enforcement investigations, reports criminal incidents to the appropriate law enforcement agency, and actively assists in timely reporting of crimes with law enforcement.

2.1 Department of Public Safety Staff

- Executive Director of Emergency Management and Public Safety
- Associate Director for Operations
- Assistant Director for Training Development and Student Security Programming
- Assistant Director for South Lake Union
- Department Administrative Assistant
- 5 Shift Supervisors – Campus Public Safety
- 23 Campus Public Safety Officers
- 1 Lead Communications Center Dispatcher
- 3 Communications Center Dispatchers
- A support cadre of 10-15 part-time student employees

2.2 Campus Public Safety Services

- First Aid and CPR response
- Investigations and crime prevention services
- 24-hour campus grounds and facilities security patrols
- After-hours building admits and walking safety escorts
- Coordination of police, fire and emergency medical responses to campus
- Crisis and disaster planning and response
- Emergency alert notification and emergency messaging services
- University special event security
- University lost and found
- Jump-starts for vehicles

DPS officers patrol Seattle University's campus 24 hours a day, providing public safety services to University students, faculty, and staff, and protecting property; detecting and reporting fire and safety hazards; conducting routine life safety inspections of all facilities and inspections of campus security lights; conducting "Night-Safety walks" with student leaders for crime prevention purposes including conducting student surveys of the campus grounds and lighting; providing education and training on security and safety for the University community; conducting investigations; coordinating with city, state, and federal law enforcement officials; maintaining a 24-hour, 365 days/year, emergency/facilities radio-telecommunications and disaster preparedness notification system; coordinating an emergency medical/first aid transportation system to local hospitals; and implementing snow and other contingency alert plans when conditions warrant.

Upon hire, all full-time DPS officers are required to participate in three weeks of initial training with a DPS Shift Supervisor, the Associate Director for Operations and/or the Assistant Director for Training Development and Student Security Programming; and successfully complete officer training within the departmental training criteria. All DPS student employees are required to participate in at least 40 hours of training under the direction of a DPS Shift Supervisor, the Assistant Director for Training Development, and/or the Associate Director for Operations; and successfully complete all student employee training requirements. All DPS officers annually attend numerous specialized training sessions. Training and education qualifications for department officers may include associate or bachelor's degrees, prior

campus public safety officer service, or other criteria depending upon each officer's prior experience or background.

DPS operates on a 24-hour basis. There are campus-only telephones located in each campus residence hall lobby and "blue-light" emergency phones strategically located throughout campus, which provide a direct line to the DPS communication center. There are also emergency telephones that provide a direct line to the DPS dispatcher outside the main entrances of most residence halls. Regular security patrols of student residence facilities and all campus grounds are performed 24-hours/day, 365 days/year. The Department of Public Safety operates a 24-hour walking escort service on campus for students and other members of the University community.

Safety is a major consideration in landscaping and exterior lighting on campus. Facilities personnel keep a daily maintenance log of needed repairs and replacements. DPS reports for repair any unlighted or obscured areas or other safety hazards as part of their daily patrol. DPS conducts routine inspections of campus fire sprinkler valves as part of our safety program and conducts annual safety training for Resident Assistants in the residences and fire drills in all residential buildings.

Crimes on campus are reported to the Seattle Police Department, which is the local law enforcement agency for University property and surrounding areas of campus. The DPS office seeks to foster a sense of community, safety and belonging among all University students.

Safety and campus crime data are maintained and accessible 24 hours a day on the Seattle University Public Safety web page (https://www.seattleu.edu/life-at-seattle-u/safety/clery/) and available by request at the Public Safety business office located in the lower level of the Columbia Building (1313 E. Columbia St., Seattle, WA 98122). Daily Crime Log data posted on the Public Safety website is available for the previous 60 days at minimum.

3 CAMPUS CRIME PREVENTION INFORMATION

3.1 Our Partnership: "Community Safety is Everyone's Responsibility"

Campus safety guidelines are posted in each campus building. New student orientations and new employee orientations are provided in which DPS attends and provides resource information about Seattle University safety programs. DPS also attends campus department and organization meetings at their request to provide information and further understanding regarding recommended safety practices.

Anything that you think is suspicious should be reported to DPS without delay. You may call ext. 5911 from any on-campus phone to report emergencies or suspicious activities. Members of the Seattle University community are required to accurately report all crimes to DPS immediately. In the case of theft or burglary, try not to disturb the scene. DPS and the Seattle Police may be able to gather evidence if nothing has been disturbed.

Always be alert to suspicious persons in and around buildings and on campus grounds and parking lots. Do not approach them. Call Public Safety at (206) 296-5990, or in case of emergency, (206) 296-5911.

3.2 Campus Emergency Blue Light Phone Program

The University has installed over 70 emergency phone call stations throughout campus, most with a signature blue light for identification. Most parking areas, campus pedestrian mall intersections, and entrance areas to residence facilities are equipped with emergency blue light phones. Emergency blue light phones are also located at each sports field, and all have an emergency button that automatically connects you to Campus Public Safety.

Three on-campus student housing facilities - Yobi Apartments, Douglas Apartments, and Vi Hilbert Hall - also have numerous emergency phone stations inside the building. These phone stations are maintained by the building's management company, Blanton Turner, and are answered by a third-party contractor, Guardian Security. Guardian Security routes callers to the appropriate resources, such as building maintenance, building management, or emergency responders.

3.3 Personal Safety

3.3.1 In General

- If you sense a potential threat, consider your options and act immediately to get away from the danger.

- Yell or scream. Attract attention. Yell "Call the Police" and run toward a lighted public area. Go into an open business or building and call DPS (206) 296-5911, or ext. 5911 from a campus phone, or the police (911). Describe what happened and where. Give a detailed description of any suspect(s), as well as a description of any vehicle(s) involved, including license plate number(s). Tell the operator which direction the person(s) went, as well as any other pertinent information.

- The best time to plan your response to a crime is before it occurs. Consider your options and abilities. Consider how you will act in certain situations. What items do you normally carry that have self-defense potential? Remember that nothing you own is worth getting hurt over. If you are in danger, do anything you can to escape and call for help. Remember, you can use the Emergency Blue Light Phones or any campus phone to dial ext. 5911 to contact Public Safety. If you are off campus, call 911 to summon help.

3.3.2 Protecting Your Personal Property

- Theft is one of the most common crimes on campus. It is a crime of opportunity that you are in the best position to prevent by reducing or removing the opportunity.

- Keep the doors and windows of your residence locked. Never prop open otherwise locked doors.

- Do not leave purses, backpacks, or books unattended anywhere on campus.

- Do not keep large sums of cash, jewelry, or other valuables in your room. Consider a small personal safe for medication and valuables. Any valuables you do bring to campus should leave with you when you go home for vacation.

- Always remove your keys and lock your car.

- Park your vehicle in well-lit areas and in front of open businesses.

- Install an auto alarm system in your vehicle, particularly if you have high-end electronics in your vehicle.

- Never leave valuables visible in your car. Lock them in your trunk before you arrive at your destination or take them with you.

- Mopeds and scooters should be shackled to bike racks provided for your convenience.

- Always walk your moped or scooter to a bike rack; do not operate a combustion engine on a campus pedestrian mall or sidewalk.

- Use a heavy-duty U-shaped lock to secure your bike, even if you only plan to leave it for a moment. A thief can steal an unsecured bike in seconds. Most cable locks are not appropriate for security for your bicycle in the City of Seattle as they are quickly defeated. There are a limited number of spaces available in a secured area for community members who wish to store their bicycles in a space other than one of the open bicycle racks available on campus. All community members have access to this storage area.

3.3.3 Safety at Home – On & Off Campus

- Lock all doors and windows, even when you are only going to be away for a short while. If possible, keep doors and windows closed when home alone, and certainly while asleep. Consider installing window stops that prevent windows from opening wide enough for a person to enter.

- Keep emergency phone numbers close to your telephone. The City of Seattle provides an enhanced 911 system. Dial ext. 5911 for an emergency on campus. Those living off campus should call their local 911 emergency dispatch center for fire, medical aid, and police services.

- Do not open your door for someone you do not know or cannot see. Do not worry about being polite.

- Never allow strangers in to use the phone, even if they say it's an emergency. Call for them, but do not let them in.

- Do not hide keys outside. If you can think of a place to hide a key, a burglar can find it.

- If you have to leave your car keys with a mechanic or parking lot attendant, remove all keys from the ring except the car keys. Never put your home address on your key ring or attach an ID card to your key ring.

- Get to know your neighbors and get involved in your local "Safe Street," "Block Watch," or "Neighborhood Watch" group.

3.3.4 Safety in Your Residence Hall

- Never let anyone into the building unless you positively know them as a resident. If they claim to be visiting a friend, instruct them to call them.

- Never prop open outside doors; you will be placing everyone else at risk.

- Keep your door locked when you are inside your room, and make sure it is locked whenever you leave, even if it is only for a few moments. Leaving a door open can be a dangerous mistake, one that has had personal safety impacts on other college campuses.

- Do not leave messages announcing your absence, as this can create the impression your space is safe to tamper with. Instead, connect with a friend or relative and let them know where you are going and when you will return. Let them know when you are safely back.

- If you are in immediate danger, call (206) 296-5911, if possible, scream, or even pull a fire alarm if one is accessible. Remember, a false alarm is no joke (it's a crime) but pulling a fire alarm may be an acceptable and appropriate action in an emergency situation.

3.3.5 Safety When Walking & at Transit Stops

- Avoid walking alone at night. On campus and within two blocks around campus, you can call Campus Public Safety at ext. 5990 for a walking escort. From off campus, dial (206) 296-5990. On or off campus, it is advisable to walk with a friend whenever possible. Keep in mind that on a small campus like SU, odds are that someone else is also leaving within a few minutes and is headed in your direction. If you are alone, walk within 10 to 15 steps of other community members traveling the same direction as you, or ask to walk with them!

- Choose routes that avoid dark and vacant areas. Know where the emergency phones are located along your route. Wear clothes and shoes that allow you to move quickly. Have emergency numbers programmed into your cell phone to assist in summoning help should you need it.

- Walk with a purpose, keep your eyes up, and scan your surroundings (including behind you). Make eye contact with others.

- Anticipate potentially dangerous situations and avoid them.

- Have your keys in hand. You'll avoid standing outside fumbling for them, and they make a good weapon if the need arises.

3.3.6 Safety When Driving

- Look in your car before getting in, noticing if anything is disturbed or out of place.
- Once inside, lock all doors and keep windows rolled up.
- Drive on well-traveled, brightly lit roads and never pick up hitchhikers. Keep your cell phone handy.
- If you suspect you are being followed, call 911 and drive to an open business, police station, or fire station to seek help. It is legal to use your cell phone while driving in Washington State if you are using it to dial 911.
- If you fear leaving your car, sound the horn repeatedly. Use your cell phone to call 911. Provide the 911 operator with your location, name, and what is happening. Stay in the car until an officer arrives. If you do not have a cell phone and someone stops to help, stay in your car and ask them to call 911 for you.

3.4 Facilities Access

3.4.1 In General

Seattle University is a private institution, and as such reserves the right to limit access to and the use of its grounds and facilities as it deems appropriate. The University in its entirety is restricted for use by SU students, faculty, staff, authorized visitors, and guests. The general public may be granted a limited invitation to campus facilities for specific purposes such as athletic events, forums, concerts, conferences, etc. However, access to any University facility by any person is strictly limited to those having legitimate legal business in that area or facility. The University reserves the right to limit access to any facility at any time without prior notice. All such access shall be contingent on adherence to all University policies and regulations regarding use of its grounds and facilities.

Maintenance of campus facilities is coordinated through the University's Facilities Services. Great emphasis is placed on security considerations in the maintenance of campus facilities. The Facilities Services Office posts notices in advance of all major projects when those projects are likely to affect members of the University community. Employees of the University perform most maintenance operations. In those cases where outside contractors are required, the University selects reputable firms with a history of solid performance. Facilities Services personnel who require keys to access their designated work areas carry only the specific keys required to perform their duties. All keys are carefully monitored to ensure that unauthorized personnel do not have access to any secure areas of the campus, such as residence halls, academic buildings, and administrative offices.

3.4.2 Residential Access

Only residents, authorized guests, and those authorized University and contract personnel having specific business are allowed in residential areas. Residence hall rooms are to be occupied only by the student(s) for whom that room is reserved, except as follows:

1. Visitors are allowed with a resident escort between the hours 7:30 AM and 1:00 AM Sunday— Thursday and 7:30AM and 2:00AM Friday and Saturday. Visitation is contingent upon mutual agreement by roommates, and the guest must be pre-approved and registered with the Residential Community Coordinator.

2. Between 1:00AM and 7:30AM Sunday-Thursday and 2:00AM and 7:30AM Friday and Saturday, visitation is restricted to persons of the same gender, provided that the persons are not involved in an amorous relationship. Visitation is contingent upon mutual agreement by roommates, and the guest must be pre-approved with the Residential Community Coordinator.

3. Temporary guests of the same gender may be permitted to stay with residents for up to three days without charge, again contingent upon mutual agreement by roommates, and overnight guests must be registered with the Residential Community Coordinator.

4. Additional specific guidance and policy is available in the Seattle University Housing Resident Handbook.

Keys are issued to residents for their own use. All keys must be promptly returned upon termination of housing contract or room change. Lost keys must be reported immediately for the safety of all residents. Duplication of any University keys by anyone other than authorized University personnel is strictly prohibited. Room, mail, or other keys may not be duplicated or given to persons other than to whom they were issued. Anyone who illegally or against University policy possesses, uses, or duplicates a University key is subject to disciplinary action.

When residence hall main entrances are unlocked and open during scheduled events, a Campus Public Safety staff member will assist in monitoring the entrance doors. The residence hall doors are otherwise locked and accessible only by authorized persons. Residents may enter the main doors with the use of electronic key card or a high-security key. They are prohibited from letting any other persons into the hall unless they know them to be a resident of that hall. Campus Public Safety regularly patrols the residence halls and ensures that all entrances are properly secured, and that no unauthorized persons are present.

4 OFF-CAMPUS BEHAVIOR POLICY

Seattle University does not have any recognized off-campus student organizations or non-campus housing facilities, but it reserves the right to review student misconduct which occurs at any location off-campus when such behavior reflects upon the integrity of the University, impacts the University requirement, or as required by law. The University follows up on community complaints regarding criminal or conduct violations which are reported as being associated with Seattle University or its community members. Off-campus misconduct cases of this nature are investigated by the Office the Dean of Students and/or DPS and are subsequently reviewed within the University integrity formation process. Students may also be held responsible for their actions by law enforcement, and/or through civil or criminal court proceedings, independently from the University integrity formation process. DPS collaborates with the Seattle Police Department to help maintain community safety, and the Seattle Police Department may assist the University by reporting behavior concerns to the University if they become aware that a suspect is a Seattle University community member.

5 CRIME PREVENTION EDUCATION

Campus Public Safety administrators give presentations throughout the academic year to various University organizations that sponsor and promote programs designed to educate the campus community in issues related to crime prevention and personal safety. Campus Public Safety, Housing & Residence Life, Student Health Services, Counseling and Psychological Services, and various student associations have co-sponsored these programs at various campus locations and student open-house events. Some of these presentations also include information on preventing sexual assaults. Similar programs are offered to staff and faculty. Programs include:

5.1 New Student Orientations

New Student Orientations are held annually. Services provided by Public Safety are reviewed, including street smarts, city safety information, theft prevention related to personal property and vehicle safety, how to report a crime, safety escort program, emergency phone system, building security, emergency text messaging, identifying, preventing, and reporting hazing, information about sexual assault, domestic violence, dating violence, and stalking, including resources available and reporting options.

5.2 New Employee Orientations

New Employee Orientation sessions are held monthly by Human Resources. Services provided by Public Safety are reviewed including how to report a crime, strategies to reduce crime on campus, safety escort program, emergency phone system, emergency text messaging, identifying, preventing, and reporting hazing, information about sexual assault, domestic violence, dating violence, and stalking, including resources available and reporting options.

5.3 Integrity Formation

First Year students are advised on the University's integrity formation commitment at the beginning of each fall. The sexual misconduct policy is reviewed, in addition to the importance of obtaining consent before engaging in any sexual activity and situations where a person cannot provide consent. Bystander roles and responsibilities are addressed. Additionally, all students are annually provided with notice of the Code of Student Conduct.

5.4 Campus Community Crime Prevention

Operation ID of personal property and bikes, tips on protection regarding identity theft and credit card fraud. Campus community crime prevention is conducted year-round on an ongoing basis.

5.5 Personal Safety

Crime prevention and safety tips relating to personal safety for everyone are communicated to the campus community as a whole several times annually as they are included in many campus-wide communications including Timely Warning Notifications. Individualized safety tips and safety planning are also provided to individuals on a case-by-case basis upon request and as part of the Public Safety Department's response to receiving an incident or crime report.

5.6 Self-Defense Classes (Strategic Living)

The Department of Public Safety hosts an empowerment and self-defense course for students in the fall of each year.

5.7 Clothesline Project

Health and Wellness sponsors this week-long program annually at Seattle U, The Clothesline project is a national organization that strives to abolish violence against women through decoration of t-shirts that are both supportive and empowering for survivors of sexual violence. These t-shirts are hung on a clothesline in the Student Center and at the annual Take Back the Night program sponsored by the Health and Wellness Crew.

5.8 Take Back the Night

Annual program to raise awareness of sexual violence, educate and promote efforts to prevent sexual violence.

5.9 Step UP!

A program designed to emphasize the importance of individuals in bystander intervention and taking action to keep community members safe. The program teaches people about the determinants of prosocial behavior and makes them more aware of why they sometimes don't help. As a result, they are more likely to help in the future.

5.10 One Love

A partnership with the One Love Foundation to address relationship violence on campus.

5.11 Active Shooter Training, Planning, and Response

Campus Public Safety offers armed assailant training to the campus community. Seattle University uses the Run. Hide. Fight. method in addition to other multi-modal response trainings. Training may also include review of the US Department of Homeland Security active shooter preparedness video, other similar videos, and/or campus safety planning. Elements of this planning and response are continuously ongoing and include a campus-wide drill that is held annually.

5.12 Inclusive Voices for Change

Voices for Change is an online training program designed to promote a healthier and safer campus environment for everyone. Seattle University requires all incoming students to complete the program prior to attending classes. Voices for Change is divided into four critical areas which students face. Those areas are: living in and supporting inclusive community, understanding and prevention sexual misconduct through bystander intervention, understanding alcohol and other drugs, and preventing hazing and bullying.

5.13 Sexual Assault Awareness Month (SAAM)

April each year is SAAM and we take this opportunity to support survivors of sexual violence in our community, educate ourselves, and take an honest look at the work still to be done one campus. Previously, we've hosted film screenings, community forums, etc.

6 SECURITY POLICIES, SERVICES AND PROCEDURES

Seattle University is committed to creating an environment that provides security for persons and property without unduly burdensome policies and practices. No absolute guarantee of individual safety or security of property is possible, but with the cooperation of students, faculty, staff, and visitors, it is possible to provide a level of security that is reasonable, effective, and relatively unobtrusive. All members of the University community are expected to familiarize themselves with campus security policies and procedures, adhere to those policies and procedures, and immediately report violations.

The continuing emphasis of safety and security on campus is the responsibility of all members of the University community to help ensure their own safety and that of others by taking reasonable precautions and using a common-sense approach to personal security. Students, faculty, and staff of Seattle University have access to academic, recreational, and administrative facilities on campus.

Access to the residence halls, however, is limited to students and their escorted guests, according to University policy (described in Section 3.4.2 of this report). Access to the residence halls by University staff and contractors is on an "as needed" basis and incorporates strict key control procedures. The general public may attend local community meetings, cultural and recreational events, and sporting events on campus with their access limited only to the facilities in which these events are held.

6.1 Reporting Emergencies & Crime on Campus

DPS is the designated office to report all criminal incidents and or safety concerns on University-owned or controlled property. DPS advises all students, employees, and visitors to immediately and accurately report all emergencies and/or incidents occurring on campus to DPS. DPS emphasizes that all University deans, department chairs/heads, and/or cost center managers must report any crimes they become aware of to the DPS office immediately. The Seattle Police Department is asked to inform the Campus Public Safety office of any crimes on campus property or involving University members. All crimes reported to DPS in the previous 60 days are included in a public Daily Crime Log that is posted on the Public Safety web page (https://www.seattleu.edu/life-at-seattle-u/safety/clery/), and thus available 24 hours a day.

Anyone observing unsafe, suspicious, or criminal activity of any kind is asked to report the issue to DPS. In-person reporting is available 24-hours a day at the Public Safety office, which is located on campus in the lower level of the Columbia Building (1313 E. Columbia St., Seattle, WA 98122). Telephone reporting is available at (206) 296-5990 (ext. 5990 from a campus phone). In the case of an emergency on campus, calls should be made to (206) 296-5911 (ext. 5911 from a campus phone). 911 should be called for off-campus emergencies. The DPS office is always staffed, and DPS officers are always available to help you when needing to report incidents to Seattle Police or other law enforcement agencies.

7 FIRE SAFETY

7.1 On Campus Residences

DPS is responsible for responding and coordinating the Seattle Fire Department's response to campus fire alarms and fires. DPS maintains a public Fire Log at the DPS office of all fires that are reported in on-campus student residence facilities. All fire events and fire safety issues, no matter how small, need to be reported to Campus Public Safety immediately. To ensure proper data collection and reporting, even fires that have already gone out or have been extinguished must be reported as soon as possible.

Public Safety is located on the lower level of the Columbia Building (1313 E. Columbia St., Seattle, WA 98122), and reachable at (206) 296-5990, or in an emergency at (206) 296-5911. The Fire Log is posted in the lobby of the Public Safety office and is available by request by contacting the DPS office at (206) 296-5990. This policy is reviewed annually prior to the publishing of this Annual Security and Fire Safety Report (ASFSR). The following is a list of Seattle University residence halls followed by information about each building's compliant fire system:

First Hill Campus:

- Archbishop Murphy Apartments
    - Peter Claver House
    - Tekakwitha House
    - Hopkins House
    - Grande House
    - Dorothy Day House
- Bellarmine Residence Hall
- Campion Residence Hall
- Chardin Residence Hall
- Douglas Apartments
- Kolvenbach Residences
- Logan Court Townhomes (1&2)
- Vi Hilbert Hall
- Xavier Residence Hall
- Yobi Apartments

South Lake Union Campus:

- The Commons Residence Hall

All community members should report smoke or fire immediately by calling Public Safety at (206) 296- 5911. Students are not permitted to tamper with, disable, or destroy smoke detectors or other fire safety devices. Students found to be tampering with or destroying fire alarm equipment or interfering with the proper operation of fire life safety equipment may be

cited by the Seattle Fire department, face criminal charges, and will be referred for University disciplinary action. It is always essential that fire lanes be kept clear of vehicles and obstructions.

Electrical appliances exceeding 1200 watts or with exposed heating elements, including but not limited to space heaters, sunlamps, torchiere halogen lamps, ceiling fans, air conditioners, electric grills and hot plates, afford undue safety risks and are prohibited in rooms and independent living units. Woks, rice-cookers, toaster ovens, coffee makers, and similar cooking appliances may not be used in any room other than a University residence facility kitchen or kitchenette. Due to power and facilities risks, other large electrical items are not permitted in. Candles (including unburned, decorative candles), incense, cigars, cigarettes, hookahs and other objects with open flames or embers are not permitted in residence halls and are considered extremely dangerous.

7.2 Campus Residence Fire Systems

First Hill Campus:

7.2.1 Archbishop Murphy Apartments (All Buildings)

All resident spaces have local smoke detection to alert students to the presence of smoke. All buildings are fully covered with an automated fire sprinkler system which is tied into a modern life safety point identification fire alarm system with audible horns to alert for evacuation.

7.2.2 Bellarmine Residence Hall

The building has a fully automated point identification life safety fire alarm system. Non-residence smoke and heat detectors trigger the audible horns for building evacuation. The building-wide, fully automated fire sprinkler system triggers building evacuation upon activation. Residence Hall rooms have single station smoke detectors, heat detection, and sprinkler suppression. Local room smoke activation sounds a local alarm in the room only to alert the residence of smoke, while the heat detector and sprinkler activation trigger building evacuation horns.

7.2.3 Campion Residence Hall

The building has a fully automated point identification life safety fire alarm system. Non-residence smoke and heat detectors trigger the audible horns for building evacuation. The building-wide, fully automated fire sprinkler system triggers building evacuation upon activation. Residence Hall rooms have single station smoke detectors, heat detection, and sprinkler suppression. Local room smoke activation sounds a local alarm in the room only to alert the residence of smoke, while the heat detector and sprinkler activation trigger building evacuation horns.

7.2.4 Chardin Residence Hall

All resident spaces have local smoke detection to alert students to the presence of smoke and heat detectors which alert for building evacuation when activated; both are tied into a modern

life safety point identification fire alarm system with audible horns to alert for evacuation. The building is fully covered with an automated fire sprinkler system which is also tied into the life safety point identification fire alarm system.

7.2.5 Douglas Apartments

The building has a fully automated life safety fire alarm system and fire sprinkler system. Resident room smoke detectors trigger local audible horns and building evacuation upon continued smoke presence.

7.2.6 Logan Court Townhomes (1&2)

The buildings have local smoke detection throughout to alert occupants of smoke conditions.

7.2.7 Kolvenbach Residences

The residences have a fully automated fire sprinkler system and smoke detection which triggers the fire alarm system and audible horns for evacuation.

7.2.8 Vi Hilbert Hall

This building is a mixed used space with residence rooms and offices. The fire system is fully automated, with sprinklers and a backup water supply. The detectors in the halls are integrated into the system to allow activation of the system. The room detectors are remote and will not activate the building's fire system.

7.2.9 Xavier Residence Hall

The building has a fully automated point identification life safety fire alarm system. Non-residence smoke and heat detectors trigger the audible horns for building evacuation. The building-wide, fully automated fire sprinkler system triggers building evacuation upon activation. Residence Hall rooms have single station smoke detectors, heat detection, and sprinkler suppression. Local room smoke activation sounds a local alarm in the room only to alert the residence of smoke, while the heat detector and sprinkler activation trigger building evacuation horns. The building has a fully automated life safety fire alarm system and fire sprinkler system. Building smoke triggers local audible horns and building evacuation upon continued smoke or fire presence.

7.2.10 Yobi Apartments

The building has a fully automated life safety fire alarm system. Resident room smoke detectors trigger local audible horns and building evacuation upon continued smoke presence.

South Lake Union Campus:

7.2.11 Cornish Commons (2025 Terry Ave)

Cornish Commons is a high rise building and that makes it more complex. High rise fires are more complex than many other occupancies because of: the number of people occupying the

building and the distances they must travel to evacuate, the building's size and the physical challenges to firefighters in tackling the fire.

Controlled evacuation with zoned alarm system - The Commons has a zoned alarm system. This means the alarm will ring on only a few floors in the direct vicinity of the fire. The minimum number of floors that must go into alarm are the fire floor and the floor above. Persons on a floor where an alarm is sounding are to enter the exit stairwell, go down four (4) floors, and re-enter the building. If the alarm is sounding on this floor too, the persons are to evacuate the building and relocate to the Designated Meeting Location.

7.3 Fire Statistics

Fire definition: The Higher Education Act defines a fire as "any instance of open flame or other burning in a place not intended to contain the burning or in an uncontrolled manner." The Seattle University Department of Public Safety documents and records all campus fires. Students and employees should immediately report the occurrence of any fire to the Department of Public Safety by calling (206) 296- 5911, or by calling ext. 5911 from a campus phone. Campus fire statistics for previous years are kept on file at the Department of Public Safety and may be viewed upon request.

7.3.1 First Hill Campus Fire Statistics (1/1/2023 - 12/31/2025)

Location	Total Fires	Total Injuries	Total Deaths	Notes
Bellarmine Hall	0	0	0	
Campion Hall	0	0	0	
Chardin Hall	0	0	0	
Murphy Apartments: Peter Claver House	0	0	0	
Murphy Apartments: Tekakwitha House	0	0	0	
Murphy Apartments: Hopkins House	0	0	0	
Murphy Apartments: Grande House	0	0	0	
Murphy Apartments: Dorothy Day House	0	0	0	
Xavier Hall	0	0	0	
Yobi Apartments	1	0	0	**Date/Time:** 4/29/2024 9:49 PM **Cause:** Unintentional, cooking: Food left unattended in an oven. **Value of Damage:** $0
Douglas Apartments	0	0	0	
Vi Hilbert Apartments	0	0	0	
Logan Townhomes (1)	0	0	0	
Logan Townhomes (2)	0	0	0	
Kolvenbach Residence (1217)	0	0	0	
Kolvenbach (1220)	0	0	0	

7.3.2 South Lake Union Campus Fire Statistics (1/1/2023 - 12/31/2025)

Location	Total Fires	Total Injuries	Total Deaths	Notes
The Commons Residence Hall	0	0	0	

7.4 Fire Drills

The numbers of fire drills conducted in each on-campus student housing facility during the 2025 calendar year are provided below:

7.4.1 First Hill Campus Housing

- Archbishop Murphy Apartments (All Buildings): 3
- Bellarmine Residence Hall: 3
- Campion Residence Hall: 3
- Chardin Residence Hall: 3
- Douglas Apartments: N/A
- Kolvenbach Residences: N/A
- Logan Court Townhomes (1&2): N/A
- Vi Hilbert Hall: N/A
- Xavier Residence Hall: 3
- Yobi Apartments: N/A

7.4.2 South Lake Union Campus Housing

- The Commons Residence Hall: 2

7.5 Future Fire System Improvements

Campus building fire alarm panels are under review for improved communications capability to alarm monitoring using cellular/radio communications. The Department of Public Safety has identified central station monitoring capability as a possible future improvement. The recommendation is currently under review.

7.6 General Fire Safety Procedures

7.6.1 General Fire Evacuation Procedures

All students, faculty, and staff should be familiar with the fire evacuation route in their building(s). The University asks all students, faculty, and staff to read the evacuation procedures for the building(s) in which they live, work, or frequent. These procedures are posted in every building's classrooms, conference rooms, and other common spaces, and are also included in Section 14.8 of this report. DPS also provides this information in safety presentations to groups of the campus community, including at new employee orientation sessions, Housing and Residence Life Resident Assistant training sessions, and upon request

by any department or community member. People with disabilities, or who may have difficulty evacuating, should familiarize themselves with the shelter-in-place information in this section.

1. When the building alarm sounds, occupants should quickly exit the building. If in your room or office, proceed immediately to the door, staying low if there is smoke present. Touch the door quickly; if the door is hot, it may not be safe to exit. Seconds count when evacuating from a fire. Don't hesitate to evacuate, think ahead and leave a coat near the exit door, but don't pause to look for one.

2. If heat is detected after a few seconds, do not open the door. Immediately call (206) 296-5911 to report your location and, if possible, hang a sheet or towel out the window to attract attention. Close the window to prevent smoke from entering the room. If no heat is felt from the door, open it just a crack to check for smoke. If no smoke is detected, exit and proceed out of the building. Keep low to the floor if smoke is present.

3. Exit the building quickly and calmly using the designated stairwells.

4. Once outside, move away from the building to allow the fire and police personnel to respond to the alarm.

7.6.2 General Fire Shelter-in-Place Procedures

If all exits or stairways are blocked, go to the nearest room and close the door. If the room has a window, turn the lights on, open the blinds, and use masking tape to mark a large X across the entire window, or tape a large bright colored item onto the window to signal that the room is occupied. Use wet towels or clothes to block at the bottom of the door to prevent smoke from entering. Don't open the windows as smoke is likely to be drawn into the room.

If there is a telephone available call ext. 5911 or (206) 296-5911 from your cell phone and give the dispatcher your room number. Remain calm, stay on the line, and wait for assistance. If smoke enters the room, stay as close to the floor as possible to avoid breathing the smoke. DOORS MUST REMAIN CLOSED UNTIL HELP ARRIVES.

7.7 Student Housing Fire Evacuation Procedures

Student housing evacuation procedures are posted on the SU Public Safety website, throughout on- campus academic buildings, and are included in this section. Public Safety and Housing and Residence Life staff train quarterly together in fire drill/building evacuation procedures. Annual fire statistics for on-campus student housing are available in Section 7.3.1 this report and at the Department of Education website: http://ope.ed.gov/campussafety/. Select "Get Data For One School" and enter "Seattle University."

7.7.1 Archbishop Murphy Apartments (All Buildings)

Building Evacuation Plan

Emergency Evacuation — IF THE FIRE ALARM IS ACTIVATED OR PUBLIC SAFETY STAFF ISSUES AN EVACUATION ORDER THEN:

- Proceed to the nearest exit. Help those who need assistance in exiting the building. DO NOT USE ELEVATORS.
- If you are in a room when the alarm sounds, check surface of door and/or doorknob for heat before opening the door. Check bottom of door for signs of smoke.
- If there is no evidence of heat or smoke, slowly open door, keeping the door between you and the corridor. Make a visual observation of the corridor for fire or smoke.
- If no smoke or fire is observed, proceed to the nearest exit or stairway. If the nearest exit or stairway is blocked, proceed to the next nearest exit or stairway. CLOSE ALL DOORS BEHIND YOU.
- If all exits or stairways are blocked, go to the nearest room and close the door. If the room has a window, turn the lights on, open the blinds, use masking tape to mark a large X across the entire window, or tape a large bright colored item onto the window, to signal that the room is occupied. Use wet towels or clothes to block at the bottom of the door to prevent smoke from entering. Don't open the windows as smoke is likely to be drawn into the room. If there is a telephone available call ext. 5911 and give the dispatcher your room number, remain calm, stay on the line, and wait for assistance.
- If smoke enters the room, stay as close to the floor as possible to avoid breathing the smoke. DOORS MUST REMAIN CLOSED UNTIL HELP ARRIVES.
- After evacuating the building, move to your Evacuation Assembly Area, located at SU PARK (Logan Field). Move well away from the building to facilitate movement of emergency response equipment. Do not attempt to re-enter the building until told to do so by Public Safety Staff.

Building Shelter-in-Place Plan

Emergency Action — IF THE SEATTLE EMERGENCY MANAGEMENT OFFICE OR PUBLIC SAFETY STAFF ISSUE A SHELTER-IN-PLACE ALERT VIA E-MAIL, VOICE-MAIL, OR POSTED ALERT THEN:

- Stay indoors. Do not exit the building. Remain calm.
- All occupants should seek safety in bathrooms.
- Close and secure all doors and windows in the apartment. Seal door seams with paper, clothing, tape, or available material, which will provide an insulation effect.
- Turn on any computer and log onto the campus e-mail or check for messages sent on the campus text message alerts. If a radio is available turn to the local emergency channel; KIRO AM 710 or FM 97.3, KOMO AM 1000 or FM 97.7. Wait until the 'All Clear Signal' is given before leaving safety.
- If necessary, cover your mouth and nose with a wet cloth.

7.7.2 Bellarmine Residence Hall

Building Evacuation Plan

Emergency Evacuation — IF THE FIRE ALARM IS ACTIVATED OR PUBLIC SAFETY STAFF ISSUES AN EVACUATION ORDER THEN:

- Proceed to the nearest exit. Help those who need assistance in exiting the building. DO NOT USE ELEVATORS.
- If you are in a room when the alarm sounds, check surface of door and/or doorknob for heat before opening the door. Check bottom of door for signs of smoke.
- If there is no evidence of heat or smoke, slowly open door, keeping the door between you and the corridor. Make a visual observation of corridor for fire or smoke.
- If no smoke or fire is observed, proceed to the nearest exit or stairway. If the nearest exit or stairway is blocked, proceed to the next nearest exit or stairway. CLOSE ALL DOORS BEHIND YOU.
- If all exits or stairways are blocked, go to the nearest room and close the door. If the room has a window, turn the lights on, open the blinds, use masking tape to mark a large X across the entire window, or tape a large bright colored item onto the window, to signal that the room is occupied. Use wet towels or clothes to block at the bottom of the door to prevent smoke from entering. Don't open the windows as smoke is likely to be drawn into the room. If there is a telephone available call ext. 5911 and give the dispatcher your room number, remain calm, stay on the line, and wait for assistance.
- If smoke enters the room, stay as close to the floor as possible to avoid breathing the smoke. DOORS MUST REMAIN CLOSED UNTIL HELP ARRIVES.
- After evacuating the building, move to your Evacuation Assembly Area, located at E. Columbia Mall, between 10th Ave & 11th Ave. Move well away from the building to facilitate movement of emergency response equipment. Do not attempt to re-enter the building until told to do so by Public Safety Staff.

Building Shelter-in-Place Plan

Emergency Action — IF THE SEATTLE EMERGENCY MANAGEMENT OFFICE OR PUBLIC SAFETY STAFF ISSUE A SHELTER-IN-PLACE ALERT VIA E-MAIL, VOICE-MAIL, OR POSTED ALERT THEN:

- Stay indoors. Do not exit the building. Remain calm.
- All occupants should seek safety in bathrooms.
- Close and secure all doors and windows in the apartment. Seal door seams with paper, clothing, tape, or available material, which will provide an insulation effect.
- If necessary, use garbage or recycle containers as a toilet.
- Turn on any computer and log onto the campus e-mail or check for messages sent on the campus text message alerts. If a radio is available turn a local emergency channel; KIRO AM 710 or FM 97.3, KOMO AM 1000 or FM 97.7. Wait until the 'All Clear Signal' is given before leaving safety.
- If necessary, cover your mouth and nose with a wet cloth.

7.7.3 Campion Residence Hall

Building Evacuation Plan

Emergency Evacuation — IF THE FIRE ALARM IS ACTIVATED OR PUBLIC SAFETY STAFF ISSUES AN EVACUATION ORDER THEN:

- Proceed to the nearest exit. Help those who need assistance in exiting the building. DO NOT USE ELEVATORS.
- If you are in a room when the alarm sounds, check surface of door and/or doorknob for heat before opening the door. Check bottom of door for signs of smoke.
- If there is no evidence of heat or smoke, slowly open door, keeping the door between you and the corridor. Make a visual observation of corridor for fire or smoke.
- If no smoke or fire is observed, proceed to the nearest exit or stairway. If the nearest exit or stairway is blocked, proceed to the next nearest exit or stairway. CLOSE ALL DOORS BEHIND YOU.
- If all exits or stairways are blocked, go to the nearest room and close the door. If the room has a window, turn the lights on, open the blinds, use masking tape to mark a large X across the entire window, or tape a large bright colored item onto the window, to signal that the room is occupied. Use wet towels or clothes to block at the bottom of the door to prevent smoke from entering. Don't open the windows as smoke is likely to be drawn into the room. If there is a telephone available call ext. 5911 and give the dispatcher your room number, remain calm, stay on the line, and wait for assistance.
- If smoke enters the room, stay as close to the floor as possible to avoid breathing the smoke. DOORS MUST REMAIN CLOSED UNTIL HELP ARRIVES.
- After evacuating the building, move to your Evacuation Assembly Area, located at SU PARK (LOGAN FIELD). Move well away from the building to facilitate the movement of emergency response equipment. Do not attempt to re-enter the building until told to do so by Public Safety Staff.

Building Shelter-in-Place Plan

Emergency Action — IF THE SEATTLE EMERGENCY MANAGEMENT OFFICE OR PUBLIC SAFETY STAFF ISSUE A SHELTER-IN-PLACE ALERT VIA E-MAIL, VOICE-MAIL, OR POSTED ALERT THEN:

- Stay indoors. Do not exit the building. Remain calm.
- All occupants should seek safety in bathrooms.
- Close and secure all doors and windows in the apartment. Seal door seams with paper, clothing, tape, or available material, which will provide an insulation effect.
- If necessary, use garbage or recycle containers as a toilet.
- Turn on any computer and log onto the campus e-mail or check for messages sent on the campus text message alerts. If a radio is available turn a local emergency channel; KIRO AM 710 or FM 97.3, KOMO AM 1000 or FM 97.7. Wait until the 'All Clear Signal' is given before leaving safety.
- If necessary, cover your mouth and nose with a wet cloth.

7.7.4 Chardin Residence Hall

Building Evacuation Plan

Emergency Evacuation — IF THE FIRE ALARM IS ACTIVATED OR PUBLIC SAFETY STAFF ISSUES AN EVACUATION ORDER THEN:

- Proceed to the nearest exit. Help those who need assistance in exiting the building. DO NOT USE ELEVATORS.

- If you are in a room when the alarm sounds, check surface of door and/or doorknob for heat before opening the door. Check bottom of door for signs of smoke.

- If there is no evidence of heat or smoke, slowly open door, keeping the door between you and the corridor. Make a visual observation of corridor for fire or smoke.

- If no smoke or fire is observed, proceed to the nearest exit or stairway. If the nearest exit or stairway is blocked, proceed to the next nearest exit or stairway. CLOSE ALL DOORS BEHIND YOU.

- If all exits or stairways are blocked, go to the nearest room and close the door. If the room has a window, turn the lights on, open the blinds, use masking tape to mark a large X across the entire window, or tape a large bright colored item onto the window, to signal that the room is occupied. Use wet towels or clothes to block at the bottom of the door to prevent smoke from entering. Don't open the windows as smoke is likely to be drawn into the room. If there is a telephone available call ext. 5911 and give the dispatcher your room number, remain calm, stay on the line, and wait for assistance.

- If smoke enters the room, stay as close to the floor as possible to avoid breathing the smoke. DOORS MUST REMAIN CLOSED UNTIL HELP ARRIVES.

- After evacuating the building, move to your Evacuation Assembly Area, located at the SU Park (LOGAN FIELD). Move well away from the building to facilitate the movement of emergency response equipment. Do not attempt to re-enter the building until told to do so by Public Safety Staff.

Building Shelter-in-Place Plan

Emergency Action — IF THE SEATTLE EMERGENCY MANAGEMENT OFFICE OR PUBLIC SAFETY STAFF ISSUE A SHELTER-IN-PLACE ALERT VIA E-MAIL, VOICE-MAIL, OR POSTED ALERT THEN:

- Stay indoors. Do not exit the building. Remain calm.

- All occupants should seek safety in bathrooms.

- Close and secure all doors and windows in the apartment. Seal door seams with paper, clothing, tape, or available material, which will provide an insulation effect.

- If necessary, use garbage or recycle containers as a toilet.

- Turn on any computer and log onto the campus e-mail or check for messages sent on the campus text message alerts. If a radio is available turn a local emergency channel; KIRO AM 710 or FM 97.3, KOMO AM 1000 or FM 97.7. Wait until the 'All Clear Signal' is given before leaving safety.

- If necessary, cover your mouth and nose with a wet cloth.

7.7.5 Douglas Apartments

Building Evacuation Plan

Emergency Evacuation — IF THE FIRE ALARM IS ACTIVATED OR PUBLIC SAFETY STAFF ISSUES AN EVACUATION ORDER THEN:

- Proceed to the nearest exit. Help those who need assistance in exiting the building. DO NOT USE ELEVATORS.

- If you are in a room when the alarm sounds, check surface of door and/or doorknob for heat before opening the door. Check bottom of door for signs of smoke.

- If there is no evidence of heat or smoke, slowly open door, keeping the door between you and the corridor. Make a visual observation of corridor for fire or smoke.

- If no smoke or fire is observed, proceed to the nearest exit or stairway. If the nearest exit or stairway is blocked, proceed to the next nearest exit or stairway. CLOSE ALL DOORS BEHIND YOU.

- If all exits or stairways are blocked, go to the nearest room and close the door. If the room has a window, turn the lights on, open the blinds, use masking tape to mark a large X across the entire window, or tape a large bright colored item onto the window, to signal that the room is occupied. Use wet towels or clothes to block at the bottom of the door to prevent smoke from entering. Don't open the windows as smoke is likely to be drawn into the room. If there is a telephone available call ext. 5911 and give the dispatcher your room number, remain calm, stay on the line, and wait for assistance.

- If smoke enters the room, stay as close to the floor as possible to avoid breathing the smoke. DOORS MUST REMAIN CLOSED UNTIL HELP ARRIVES.

- After evacuating the building, move to your Evacuation Assembly Area, located at the CHAMPIONSHIP FIELD. Move well away from the building to facilitate the movement of emergency response equipment. Do not attempt to re-enter the building until told to do so by Public Safety Staff.

Building Shelter-in-Place Plan

Emergency Action — IF THE SEATTLE EMERGENCY MANAGEMENT OFFICE OR PUBLIC SAFETY STAFF ISSUE A SHELTER-IN-PLACE ALERT VIA E-MAIL, VOICE-MAIL, OR POSTED ALERT THEN:

- Stay indoors. Do not exit the building. Remain calm.
- All occupants should seek safety in bathrooms.
- Close and secure all doors and windows in the apartment. Seal door seams with paper, clothing, tape, or available material, which will provide an insulation effect.
- If necessary, use garbage or recycle containers as a toilet.
- Turn on any computer and log onto the campus e-mail or check for messages sent on the campus text message alerts. If a radio is available turn a local emergency channel; KIRO AM 710 or FM 97.3, KOMO AM 1000 or FM 97.7. Wait until the 'All Clear Signal' is given before leaving safety.
- If necessary, cover your mouth and nose with a wet cloth.

7.7.6 Kolvenbach Residences

Building Evacuation Plan

Emergency Evacuation — IF THE FIRE ALARM IS ACTIVATED OR PUBLIC SAFETY STAFF ISSUES AN EVACUATION ORDER THEN:

- Proceed to the nearest exit. Help those who need assistance in exiting the building.
- If you are in a room when the alarm sounds, check surface of door and/or doorknob for heat before opening the door. Check bottom of door for signs of smoke.
- If there is no evidence of heat or smoke, slowly open door, keeping the door between you and the corridor. Make a visual observation of corridor for fire or smoke.
- If no smoke or fire is observed, proceed to the nearest exit or stairway. If the nearest exit or stairway is blocked, proceed to the next nearest exit or stairway. CLOSE ALL DOORS BEHIND YOU.
- If all exits or stairways are blocked, go to the nearest room and close the door. If the room has a window, turn the lights on, open the blinds, use masking tape to mark a large X across the entire window, or tape a large bright colored item onto the window, to signal that the room is occupied. Use wet towels or clothes to block at the bottom of the door to prevent smoke from entering. Don't open the windows as smoke is likely to be drawn into the room. If there is a telephone available call ext. 5911 and give the dispatcher your room number, remain calm, stay on the line, and wait for assistance.
- If smoke enters the room, stay as close to the floor as possible to avoid breathing the smoke. DOORS MUST REMAIN CLOSED UNTIL HELP ARRIVES.

- After evacuating the building, move to your Evacuation Assembly Area, located at the CHAMPIONSHIP FIELD. Move well away from the building to facilitate movement of emergency response equipment. Do not attempt to re-enter the building until told to do so by Public Safety Staff.

Building Shelter-in-Place Plan

Emergency Action — IF THE SEATTLE EMERGENCY MANAGEMENT OFFICE OR PUBLIC SAFETY STAFF ISSUE A SHELTER-IN-PLACE ALERT VIA E-MAIL, VOICE-MAIL, OR POSTED ALERT THEN:

- Stay indoors. Do not exit the building. Remain calm.
- All occupants should seek safety in bathrooms.
- Close and secure all doors and windows in the apartment. Seal door seams with paper, clothing, tape, or available material, which will provide an insulation effect.
- If necessary, use garbage or recycle containers as a toilet.
- Turn on any computer and log onto the campus e-mail or check for messages sent on the campus text message alerts. If a radio is available turn a local emergency channel; KIRO AM 710 or FM 97.3, KOMO AM 1000 or FM 97.7. Wait until the 'All Clear Signal' is given before leaving safety.
- If necessary, cover your mouth and nose with a wet cloth.

7.7.7 Logan Court Townhomes (1&2)

Building Evacuation Plan

Emergency Evacuation — IF THE FIRE ALARM IS ACTIVATED OR PUBLIC SAFETY STAFF ISSUES AN EVACUATION ORDER THEN:

- Proceed to the nearest exit. Help those who need assistance in exiting the building. DO NOT USE ELEVATORS.
- If you are in a room when the alarm sounds, check surface of door and/or doorknob for heat before opening the door. Check bottom of door for signs of smoke.
- If there is no evidence of heat or smoke, slowly open door, keeping the door between you and the corridor. Make a visual observation of corridor for fire or smoke.
- If no smoke or fire is observed, proceed to the nearest exit or stairway. If the nearest exit or stairway is blocked, proceed to the next nearest exit or stairway. CLOSE ALL DOORS BEHIND YOU.
- If all exits or stairways are blocked, go to the nearest room and close the door. If the room has a window, turn the lights on, open the blinds, use masking tape to mark a

large X across the entire window, or tape a large bright colored item onto the window, to signal that the room is occupied. Use wet towels or clothes to block at the bottom of the door to prevent smoke from entering. Don't open the windows as smoke is likely to be drawn into the room. If there is a telephone available call ext. 5911 and give the dispatcher your room number, remain calm, stay on the line, and wait for assistance.

- If smoke enters the room, stay as close to the floor as possible to avoid breathing the smoke. DOORS MUST REMAIN CLOSED UNTIL HELP ARRIVES.

- After evacuating the building, move to your Evacuation Assembly Area, located at the 13th and E. Columbia St. next to the Emergency Phone. Move well away from the building to facilitate the movement of emergency response equipment. Do not attempt to re-enter the building until told to do so by Public Safety Staff.

Building Shelter-in-Place Plan

Emergency Action — IF THE SEATTLE EMERGENCY MANAGEMENT OFFICE OR PUBLIC SAFETY STAFF ISSUE A SHELTER-IN-PLACE ALERT VIA E-MAIL, VOICE-MAIL, OR POSTED ALERT THEN:

- Stay indoors. Do not exit the building. Remain calm.

- All occupants should seek safety in bathrooms.

- Close and secure all doors and windows in the apartment. Seal door seams with paper, clothing, tape, or available material, which will provide an insulation effect.

- If necessary, use garbage or recycle containers as a toilet.

- Turn on any computer and log onto the campus e-mail or check for messages sent on the campus text message alerts. If a radio is available turn a local emergency channel; KIRO AM 710 or FM 97.3, KOMO AM 1000 or FM 97.7. Wait until the 'All Clear Signal' is given before leaving safety.

- If necessary, cover your mouth and nose with a wet cloth.

7.7.8 Vi Hilbert Hall

Building Evacuation Plan

Emergency Evacuation — IF THE FIRE ALARM IS ACTIVATED OR PUBLIC SAFETY STAFF ISSUES AN EVACUATION ORDER THEN:

- Proceed to the nearest exit. Help those who need assistance in exiting the building. DO NOT USE ELEVATORS.

- If you are in a room when the alarm sounds, check surface of door and/or doorknob for heat before opening the door. Check bottom of door for signs of smoke.

- If there is no evidence of heat or smoke, slowly open door, keeping the door between you and the corridor. Make a visual observation of corridor for fire or smoke.

- If no smoke or fire is observed, proceed to the nearest exit or stairway. If the nearest exit or stairway is blocked, proceed to the next nearest exit or stairway. CLOSE ALL DOORS BEHIND YOU.

- If all exits or stairways are blocked, go to the nearest room and close the door. If the room has a window, turn the lights on, open the blinds, use masking tape to mark a large X across the entire window, or tape a large bright colored item onto the window, to signal that the room is occupied. Use wet towels or clothes to block at the bottom of the door to prevent smoke from entering. Don't open the windows as smoke is likely to be drawn into the room. If there is a telephone available call ext. 5911 and give the dispatcher your room number, remain calm, stay on the line, and wait for assistance.

- If smoke enters the room, stay as close to the floor as possible to avoid breathing the smoke. DOORS MUST REMAIN CLOSED UNTIL HELP ARRIVES.

- After evacuating the building, move to your Evacuation Assembly Area, located at the UNION GREEN & E. SPRING ST. MALL (evacuation zone F). Move well away from the building to facilitate the movement of emergency response equipment. Do not attempt to re-enter the building until told to do so by Public Safety Staff.

Building Shelter-in-Place Plan

Emergency Action — IF THE SEATTLE EMERGENCY MANAGEMENT OFFICE OR PUBLIC SAFETY STAFF ISSUE A SHELTER-IN-PLACE ALERT VIA E-MAIL, VOICE-MAIL, OR POSTED ALERT THEN:

- Stay indoors. Do not exit the building. Remain calm.

- All occupants should seek safety in bathrooms.

- Close and secure all doors and windows in the apartment. Seal door seams with paper, clothing, tape, or available material, which will provide an insulation effect.

- If necessary, use garbage or recycle containers as a toilet.

- Turn on any computer and log onto the campus e-mail or check for messages sent on the campus text message alerts. If a radio is available turn a local emergency channel; KIRO AM 710 or FM 97.3, KOMO AM 1000 or FM 97.7. Wait until the 'All Clear Signal' is given before leaving safety.

- If necessary, cover your mouth and nose with a wet cloth.

7.7.9 Xavier Residence Hall

Building Evacuation Plan

Emergency Evacuation — IF THE FIRE ALARM IS ACTIVATED OR PUBLIC SAFETY STAFF ISSUES AN EVACUATION ORDER THEN:

- Proceed to the nearest exit. Help those who need assistance in exiting the building. DO NOT USE ELEVATORS.

- If you are in a room when the alarm sounds, check surface of door and/or doorknob for heat before opening the door. Check bottom of door for signs of smoke.

- If there is no evidence of heat or smoke, slowly open door, keeping the door between you and the corridor. Make a visual observation of corridor for fire or smoke.

- If no smoke or fire is observed, proceed to the nearest exit or stairway. If the nearest exit or stairway is blocked, proceed to the next nearest exit or stairway. CLOSE ALL DOORS BEHIND YOU.

- If all exits or stairways are blocked, go to the nearest room and close the door. If the room has a window, turn the lights on, open the blinds, use masking tape to mark a large X across the entire window, or tape a large bright colored item onto the window, to signal that the room is occupied. Use wet towels or clothes to block at the bottom of the door to prevent smoke from entering. Don't open the windows as smoke is likely to be drawn into the room. If there is a telephone available call ext. 5911 and give the dispatcher your room number, remain calm, stay on the line, and wait for assistance.

- If smoke enters the room, stay as close to the floor as possible to avoid breathing the smoke. DOORS MUST REMAIN CLOSED UNTIL HELP ARRIVES.

- After evacuating the building, move to your Evacuation Assembly Area, located at the UNION GREEN & E. SPRING ST. MALL (evacuation zone F). Move well away from the building to facilitate the movement of emergency response equipment. Do not attempt to re-enter the building until told to do so by Public Safety Staff.

Building Shelter-in-Place Plan

Emergency Action — IF THE SEATTLE EMERGENCY MANAGEMENT OFFICE OR PUBLIC SAFETY STAFF ISSUE A SHELTER-IN-PLACE ALERT VIA E-MAIL, VOICE-MAIL, OR POSTED ALERT THEN:

- Stay indoors. Do not exit the building. Remain calm.

- All occupants should seek safety in bathrooms.

- Close and secure all doors and windows in the apartment. Seal door seams with paper, clothing, tape, or available material, which will provide an insulation effect.

- If necessary, use garbage or recycle containers as a toilet.

- Turn on any computer and log onto the campus e-mail or check for messages sent on the campus text message alerts. If a radio is available turn a local emergency channel; KIRO AM 710 or FM 97.3, KOMO AM 1000 or FM 97.7. Wait until the 'All Clear Signal' is given before leaving safety.

- If necessary, cover your mouth and nose with a wet cloth

7.7.10 Yobi Apartments

Building Evacuation Plan

Emergency Evacuation — IF THE FIRE ALARM IS ACTIVATED OR PUBLIC SAFETY STAFF ISSUES AN EVACUATION ORDER THEN:

- Proceed to the nearest exit. Help those who need assistance in exiting the building. DO NOT USE ELEVATORS.

- If you are in a room when the alarm sounds, check surface of door and/or doorknob for heat before opening the door. Check bottom of door for signs of smoke.

- If there is no evidence of heat or smoke, slowly open door, keeping the door between you and the corridor. Make a visual observation of corridor for fire or smoke.

- If no smoke or fire is observed, proceed to the nearest exit or stairway. If the nearest exit or stairway is blocked, proceed to the next nearest exit or stairway. CLOSE ALL DOORS BEHIND YOU.

- If all exits or stairways are blocked, go to the nearest room and close the door. If the room has a window, turn the lights on, open the blinds, use masking tape to mark a large X across the entire window, or tape a large bright colored item onto the window, to signal that the room is occupied. Use wet towels or clothes to block at the bottom of the door to prevent smoke from entering. Don't open the windows as smoke is likely to be drawn into the room. If there is a telephone available call ext. 5911 and give the dispatcher your room number, remain calm, stay on the line, and wait for assistance.

- If smoke enters the room, stay as close to the floor as possible to avoid breathing the smoke. DOORS MUST REMAIN CLOSED UNTIL HELP ARRIVES.

- After evacuating the building, move to your Evacuation Assembly Area, located at the UNION GREEN & E. SPRING ST. MALL (evacuation zone F). Move well away from the building to facilitate the movement of emergency response equipment. Do not attempt to re-enter the building until told to do so by Public Safety Staff.

Building Shelter-in-Place Plan

Emergency Action — IF THE SEATTLE EMERGENCY MANAGEMENT OFFICE OR PUBLIC SAFETY STAFF ISSUE A SHELTER-IN-PLACE ALERT VIA E-MAIL, VOICE-MAIL, OR POSTED ALERT THEN:

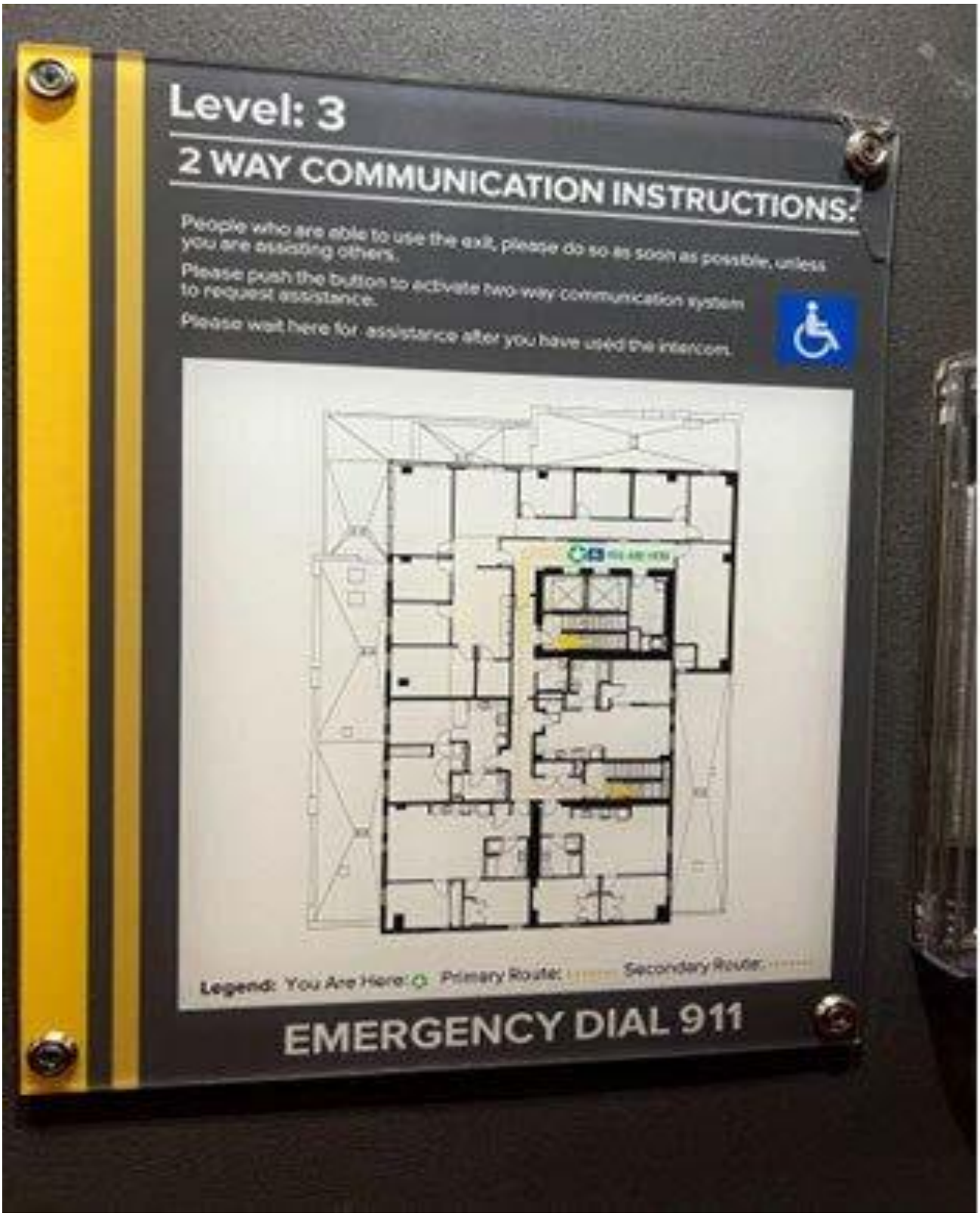
- Stay indoors. Do not exit the building. Remain calm.
- All occupants should seek safety in bathrooms.
- Close and secure all doors and windows in the apartment. Seal door seams with paper, clothing, tape, or available material, which will provide an insulation effect.
- If necessary, use garbage or recycle containers as a toilet.
- Turn on any computer and log onto the campus e-mail or check for messages sent on the campus text message alerts. If a radio is available turn a local emergency channel; KIRO AM 710 or FM 97.3, KOMO AM 1000 or FM 97.7. Wait until the 'All Clear Signal' is given before leaving safety.
- If necessary, cover your mouth and nose with a wet cloth.

7.7.11 Cornish Commons (2025 Terry Ave)

Emergency Evacuation — IF THE FIRE ALARM IS ACTIVATED OR PUBLIC SAFETY STAFF ISSUES AN EVACUATION ORDER THEN:

- Proceed to the nearest exit. Help those who need assistance in exiting the building. DO NOT USE ELEVATORS.
- If you are in a room when the alarm sounds, check surface of door and/or doorknob for heat before opening the door. Check bottom of door for signs of smoke.
- If there is no evidence of heat or smoke, slowly open door, keeping the door between you and the corridor. Make a visual observation of corridor for fire or smoke.
- If no smoke or fire is observed, proceed to the nearest exit or stairway. If the nearest exit or stairway is blocked, proceed to the next nearest exit or stairway. CLOSE ALL DOORS BEHIND YOU.
- Call for help by calling 911 and Public Safety at (206) 296-5911.

CORNISH COMMONS – Evacuation Routes Per Floor (on page 35).


Level: 3
2 WAY COMMUNICATION INSTRUCTIONS:
People who are able to use the exit, please do so as soon as possible, unless you are assisting others.
Please push the button to activate two-way communication system to request assistance.
Please wait here for assistance after you have used the intercom.
Legend: You Are Here: Primary Route: Secondary Route:
EMERGENCY DIAL 911

8 POLICY PROHIBITING SEX-BASED HARASSMENT, DISCRIMINATION, AND RETALIATION

The policy is provided below and can also be found at: https://www.seattleu.edu/media/seattle-university/documents/policies/general/Policy-Prohibiting-Sex-Based-Harassment-Discrimination-and-Retaliation.pdf.

I. POLICY STATEMENT

Seattle University is committed to providing a workplace and educational environment that is free from discrimination and harassment based on sex, and retaliation for engaging in protected activity.

II. PURPOSE AND BACKGROUND

To ensure compliance with federal, state, and local civil rights laws and regulations, and to affirm its commitment to promoting the goals of fairness and equity in all aspects of the education Program or Activity, Seattle University has developed this Policy and related Resolution Process, attached as Appendix A ("Resolution Process"), to provide prompt, fair, and impartial resolution of allegations of sexual harassment, discrimination, or retaliation.

III. APPLICABILITY/RESPONSIBILITY

A. Scope

This Policy applies to all members of the Seattle University community, including students; faculty; staff; Jesuits in residence; Board members; and contractors, volunteers, consultants, vendors, and other third parties. Each member of the University community is responsible for conducting themselves in accordance with the Policy and other University policies and procedures.

Except in cases concerning alleged sexual harassment involving only employees (which are resolved pursuant to the Human Resources Sexual Harassment Policy), Seattle University will promptly and effectively address any Complaints of discrimination in violation of this Policy using the Resolution Process.

This Policy applies to alleged incidents that occur between August 14, 2020, and July 31, 2024, and on or after November 12, 2024. For alleged incidents of sexual harassment (as defined further below), Seattle University will utilize the policy in place at the time of the alleged incident and the procedures at the time of the complaint. Applicable versions of the relevant policies are available from the Title IX Coordinator.

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

B. Jurisdiction

This Policy applies to Seattle University's education programs and activities and circumstances where Seattle University has disciplinary authority. A Complainant does not have to be a member of the Seattle University community to file a Complaint, at the discretion of the Title IX Coordinator.

This Policy may also apply to the effects of off-campus misconduct that effectively deprives a person of access to Seattle University's education program or activities. Seattle University may also extend jurisdiction to off-campus and/or online conduct when the conduct affects a substantial Seattle University interest. However, nothing in this Policy is intended to infringe upon or limit a person's rights to free speech or a faculty member's academic freedom.

Regardless of where the conduct occurred, Seattle University will address Notice/Complaints to determine whether the conduct occurred in the context of its employment or education program or activity and/or has continuing effects on campus (including virtual learning and employment environments) or in an off campus sponsored program or activity.

A substantial Seattle University interest includes:

> 1) Any action that constitutes a criminal offense, as defined by law. This includes, but is not limited to, single or repeat violations of any local, state, or federal law.
>
> 2) Any situation in which it is determined that the Respondent poses an immediate threat to the health or safety of any student, employee, or other individual.
>
> 3) Any situation that significantly infringes upon the rights, property, or achievements of others, significantly breaches the peace, and/or causes social disorder.
>
> 4) Any situation that substantially interferes with Seattle University's educational interests or mission.

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

All vendors serving Seattle University through third-party contracts are subject to the policies and procedures of their employers.

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.

Similarly, the Title IX Coordinator may be able to assist and support a student or employee Complainant who experiences discrimination in an externship, study abroad program, or other environmental external to Seattle University where sex-based harassment policies and procedures of the facilitating or host organization may give the Complainant recourse. If there are effects of that external conduct that impact a student or employee's work or educational environment, those effects can often be remedially by the Title IX Coordinator if brought to their attention.

IV. DEFINITIONS

A. Prohibited Behavior

Prohibited Behavior under this Policy refers to: (1) Title IX Sex-Based Misconduct (i.e., Quid Pro Quo Sexual Harassment; Severe, Pervasive, and Objectively Offensive Sexual Harassment; Sexual Assault; Intimate Partner Violence; and Sex and Gender-Based Stalking; as defined by and within the scope of Title IX); (2) Other Sexual and Gender-Based Misconduct (Sexual Assault; Sexual Exploitation; Sexual Harassment; Gender-Based Harassment; Sex and Gender-Based Stalking; Intimate Partner Violence); (3) Sex-Based Discrimination; and (4) Other Prohibited Conduct (i.e., Retaliation and Violation of Supportive Measures).

1. Title IX Sex-Based Misconduct

Title IX Sex-Based Misconduct is a type of Prohibited Behavior that meets the definition of Sexual Harassment in the Title IX Implementing Regulations at 34 CFR 106.30. Conduct about which a Formal Complaint (as defined below) is filed rises to the level of Title IX Sex-Based Misconduct when it:

1. Occurs in the United States; **and**
2. Occurs in a Seattle University Program or Activity; **and**
3. Is conduct on the basis of sex in which:
    a. An Employee conditions the provision of a University aid, benefit, or service on an individual's participation in unwelcome sexual conduct ("**Quid Pro Quo Sexual Harassment**");
    b. A Student, Employee, or Third Party over whom Seattle University exercises substantial control engages in unwelcome conduct determined by a reasonable person to be so severe, pervasive, and objectively offensive that it effectively denies another person equal access to a University Program or Activity ("**Hostile Environment Sexual Harassment**"); **or**
    c. A Student, Employee, or Third Party over whom Seattle University exercises substantial control engages in:

        i. **Sexual Assault**, defined as:
            A. **Rape**:
            - Penetration, no matter how slight,

- of the vagina or anus of a person,
- with any body part or object, or
- oral penetration
  - of a sex organ of the Complainant, or
  - by the Respondent's sex organ,
- without the consent of the Complainant,
- including instances where the Complainant is incapable of giving consent because of a temporary or permanent or physical incapacity.

B. **Fondling**:

- The intentional touching of the clothed or unclothed genitals, buttocks, groin, breasts, or other body parts of the Complainant by the Respondent,
  - without the consent of the Complainant,
  - for the purpose of sexual degradation, sexual gratification, or sexual humiliation
- Or, the intentional touching by the Complainant of the Respondent's clothed or unclothed genitals, buttocks, groin, breasts, or other body parts,
  - without the consent of the Complainant,
  - for the purpose of sexual degradation, sexual gratification, or sexual humiliation.

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

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

ii. **Stalking**, defined as: when an individual engages in a course of conduct which is directed at a specific person under the circumstances that would cause a Reasonable Person to:

A. Fear for their own safety or the safety of others; or
B. Suffer substantial emotional distress.

iii. **Dating Violence**, defined as violence committed by a person:

A. Who is or has been in a social relationship of a romantic, intimate, or sexual nature with the Complainant; and
B. Where the existence of such a relationship shall be determined based on the Complainant's statement and with consideration of the following factors:
   (i) The length of the relationship;
   (ii) The type of relationship; and

(iii) The frequency of interaction between the persons involved in the relationship.

Dating violence includes, but is not limited to, sexual or physical abuse or threats of such abuse.

Dating Violence does not include acts covered under the definition of Domestic Violence.

iv. **Domestic Violence** defined as felony or misdemeanor crimes of violence committed by a current or former spouse or intimate partner of the victim, by a person with whom the victim shares a child in common, by a person who is cohabitating with or has cohabitated with the victim as a spouse or intimate partner, by a person similarly situated to a spouse of the victim under the domestic or family violence laws of Washington state, or by any other person against an adult or youth victim who is protected from that person's acts under the domestic or family violence laws of Washington state.

The definition of Title IX Sex-Based misconduct does not include allegations of the types of behavior described above that relate to employees only (e.g., an employee alleges that another employee sexually assaulted or sexually harassed them). Such complaints are resolved through the University Human Resources Sexual Harassment Policy.

When reported behavior falls within this section of this Policy, it may constitute Title IX Sex-Based Misconduct and will be addressed under the Resolution Process applicable to Title IX Sex-Based Misconduct, even if the behavior also may constitute other Prohibited Conduct. If at any point the University determines that the reported behavior does not meet the definition of Title IX Sex-Based Misconduct, the matter will continue as an Other Sexual and Gender-Based Misconduct matter, Sex or Gender-Based Discrimination matter, and/or Other Prohibited Conduct matter.

Conversely, if the University is investigating a report of one of these other forms of Prohibited Conduct and receives information that indicates the behavior at issue meets the definition of Title IX Sex-Based Misconduct, the matter will continue under the Resolution Process applicable to Title IX Sex-Based Misconduct.

To the extent that reported behavior may meet the definition of Title IX Sex-Based Misconduct and any other form of conduct prohibited by this Policy, the University will treat the conduct as Title IX Sex-Based Misconduct for purposes of its response.

2. Other (Non-Title IX) Sexual and Gender-Based Misconduct

When reported behavior meets the following definition, it may constitute Other Sexual or Gender-Based Misconduct and will be addressed under the resolution procedures applicable to Other Sexual or Gender-Based Misconduct, unless it is being investigated simultaneously with reported Title IX Sex-Based Misconduct.

a. **Sexual Assault**: Conduct that does not fall within the definition of Title IX Sex-Based Misconduct where:

   i. Sexual Contact occurs without Consent; or

   ii. Non-consensual physical abuse (e.g., slapping on the face, hair pulling, choking) occurs in conjunction with consensual or nonconsensual Sexual Contact.

b. **Sexual Exploitation**: intentional conduct by which an individual takes or attempts to take non-consensual sexual advantage of another for one's own benefit, or for the benefit of anyone other than the person being exploited, and which does not fall within the definition of Title IX Sex-Based Misconduct. Examples include:

   ▪ Sexual voyeurism (such as observing or allowing others to observe a person undressing or using the bathroom or engaging in sexual acts, without the consent of the person being observed);

   ▪ Invasion of sexual privacy (e.g., doxing/doxxing);

   ▪ Knowingly making an unwelcome disclosure of (or threatening to disclose) an individual's sexual orientation, gender identity, or gender expression;

   ▪ Taking pictures, video, or audio recording of another in a sexual act, or in any other sexually related activity when there is a reasonable expectation of privacy during the activity, without the consent of all involved in the activity; or exceeding the boundaries of consent (such as allowing another person to hide in a closet and observe sexual activity, or disseminating sexual pictures without the photographed person's consent), including the making or posting of non-consensual pornography;

   ▪ Causing another to engage in sex work/prostituting another person;

   ▪ Engaging in sexual activity with another person while knowingly infected with human immunodeficiency virus (HIV) or a sexually transmitted disease (STD) or infection (STI), without informing the other person of the virus, disease, or infection compromising that person's ability to give consent to sexual activity, or for the purpose of making that person vulnerable to non-consensual sexual activity;

   ▪ Misappropriation of another person's identity on apps, websites, or other venues designed for dating or sexual connections (e.g., spoofing);

   ▪ Forcing a person to take an action against that person's will by threatening to show, post, or share information, video, audio, or an image that depicts the person's nudity or sexual activity;

   ▪ Knowingly soliciting a minor for sexual activity;

   ▪ Engaging in sex trafficking;

   ▪ Knowingly creating, possessing, or disseminating child sexual abuse images or recordings;

▪ Creating or disseminating synthetic media, including images, videos, or audio representations of individuals doing or saying sexually related things that never happened, or placing identifiable real people in fictitious pornographic or nude situations without their consent (i.e., Deepfakes, AI, etc.);

▪ Creating or disseminating images or videos of child sexual exploitation or abuse; and

▪ Causing or attempting to cause the incapacitation of another person (through alcohol, drugs, or any other means) for the purpose of compromising that person's ability to give consent to sexual activity, or for the purpose of making that person vulnerable to non-consensual sexual activity.

3. **Sexual Harassment**: Any unwelcome conduct of a sexual nature, whether verbal, graphic (e.g., pictures and videos), physical, or otherwise that does not fall within the definition of Title IX Sex-Based Misconduct as outlined above, when:
▪ Submission to such conduct is made, either explicitly or implicitly, a term or condition of a person's employment, education (or educational success), living environment, or participation in any University Program or Activity;
▪ Submission to or rejection of such conduct by an individual issued as a basis for or a factor in decisions affecting the individual's employment, education, living environment, or participation in a University Program or Activity; or
▪ Such conduct creates a hostile environment. Behavior that creates a hostile environment when it is sufficiently severe, persistent, or pervasive that it interferes with a Reasonable Person's participation in a University Program or Activity. To create a hostile environment, the behavior must be deemed severe, persistent, or pervasive from both a subjective and an objective perspective. In evaluating whether a hostile environment exists, the University will consider the totality of known circumstances, including the nature, frequency, intensity, location, context, and duration of the behavior. Although a hostile environment is generally created through a series of incidents, for the purposes of this Policy, a single severe incident can be sufficient to constitute a hostile environment. It is important to note that not all unwelcome conduct or speech of a sexual nature creates a hostile environment.

4. **Gender-Based Harassment**: harassment based on actual or perceived sex, sexual orientation, gender, gender identity, gender expression, or pregnancy that does not fall within the definition of Title IX Sex-Based Misconduct. Such harassment may include acts of aggression, intimidation, or hostility, whether verbal, graphic, physical, or otherwise, even if the acts do not involve conduct of a sexual nature, when the behavior:
▪ Adversely affects a term or condition of an individual's employment, education, living environment, or participation in a University Program or Activity;

▪ Is used as the basis for or a factor in decisions affecting that individual's employment, education, living environment, or participation in a University Program or Activity; or
▪ Creates a hostile environment. Behavior creates a hostile environment when it is sufficiently severe, persistent, or pervasive that it interferes with a Reasonable Person's participation in a University Program or Activity. To create a hostile environment, behavior must be deemed severe, persistent, or pervasive from both a subjective and objective standard. In evaluating whether a hostile environment exists, the University will consider the totality of known circumstances, including the nature, frequency, intensity, location, context, and duration of the behavior. Although a hostile environment is generally created through a series of incidents, for purposes of this Policy, a single severe incident, can be sufficient to constitute a hostile environment. It is important to note that not all gender-based behavior or speech creates a hostile environment.

5. **Sex-or Gender-Based Stalking**: When an individual intentionally engages in a course of conduct that does not fall within the definition of Title IX Sex-Based Misconduct, and which is directed at a specific person under the circumstances that would cause a Reasonable Person to:
▪ Fear for their own safety or the safety of others; or
▪ Suffer substantial emotional distress.

6. **Intimate Partner Violence**: Includes Dating Violence and Domestic Violence as defined below that does not fall within the definition of Title IX Sex-Based Misconduct, above.

a. **Dating Violence**: means violence committed by a person:

▪ Who is or has been in a social relationship of a romantic, sexual, or intimate nature with the victim; and

▪ Where the existence of such a relationship shall be determined based a consideration of the following factors:

- The length of the relationship;
- The type of relationship; and
- The frequency of interaction between the persons involved in the relationship.

Dating Violence includes, but it is not limited to, sexual or physical abuse or the threat of such abuse.

b. **Domestic Violence:** means felony or misdemeanor crimes of violence committed by a current or former spouse or intimate partner of the victim, by a person with whom the victim shares a child in common, by a person who is cohabitating with or has cohabitated with the victim as a spouse or intimate partner,

by a person similarly situated to a spouse of the victim under the domestic or family violence laws of Washington state, or by any other person against an adult or youth victim who is protected from that person's acts under the domestic or family violence laws of Washington state.

The definition of Other Sexual and Gender-Based Misconduct does not include allegations of the types of behavior described in this subsection that relate to employees only (e.g., an employee alleges that another employee sexually assaulted or sexually harassed them). Such complaints are resolved through the University Human Resources Sexual Harassment Policy.

7. **Sex-Based Discrimination**
   Sex-Based Discrimination is different treatment with respect to an individual's employment or participation in an education Program or Activity based, in whole or in part, upon the individual's actual or perceived sex, gender, gender identity, sex stereotypes, sexual orientation, and/or pregnancy or related conditions that does not fall within the definition of Title IX Sex-Based Misconduct, above. Sex-Based Discrimination also includes allegations of a failure to provide reasonable adjustments for pregnancy or pregnancy-related conditions. Sex-Based Discrimination can take two primary forms:

a. **Disparate Treatment Discrimination**: Any intentional differential treatment of a person or persons that is based on an individual's actual or perceived sex, gender, gender identity, sex stereotypes, sexual orientation and/or pregnancy or related conditions and that:
   - Excludes an individual from participation in;
   - Denies the individual benefits of; or
   - Otherwise adversely affects a term or condition of an individual's participation in a Seattle University program or activity.

b. **Disparate Impact Discrimination**: Disparate impact occurs when policies or practices that appear to be neutral unintentionally result in a disproportionate impact on a protected group or person that:
   - Excludes an individual from participation in;
   - Denies the individual benefits of; or
   - Otherwise adversely affects a term or condition of an individual's participation in a Seattle University program or activity

c. **Sex-based Discriminatory Harassment**: Unwelcome conduct on the basis of sex, gender, gender identity, sex stereotypes, sexual orientation and/or pregnancy or related conditions that:
   - based on the totality of the circumstances,
   - is subjectively and objectively offensive, and
   - is so severe or pervasive,
   - that it limits or denies a person's ability to participate in or benefit from Seattle University's education program or activity.

8. **Other Prohibited Conduct (i.e., Retaliation and Violation of Supportive Measures)**

a. Retaliation: Any adverse action against any person—including intimidation, threats, coercion, or discrimination—by a Seattle University student, employee, or other person authorized by Seattle University to provide aid, benefit, or service under Seattle University's education program or activity, that is done:

- for the purpose of interfering with any right or privilege secured by law or Policy; or
- because the person against whom the action is taken has engaged in protected activity, including:
  - reporting information;
  - making a Complaint;
  - testifying, assisting, or participating in or refusing to participate in any manner;
- in an investigation or resolution process under the Resolution Process, including an informal resolution process, or in any other appropriate steps taken by Seattle University to promptly and effectively end any sex discrimination in its education program or activity, prevent its recurrence, and remedy its effects.

The exercise of academic freedom does not constitute retaliation. It is also not retaliation for Seattle University to pursue Policy violations against those who make materially false statements in bad faith in the course of a resolution under this Policy. However, the determination of responsibility, by itself, is not sufficient to conclude that any party has made a materially false statement in bad faith.

b. Violation of Supportive Measures

Supportive Measures are discussed in more detail in Section V.F. Failure to comply with Supportive Measures as required is a separate violation of this Policy.

c. Unauthorized Disclosure

Distributing or otherwise disclosing or publicizing materials created during an investigation or resolution process, except as required by law or as expressly permitted by Seattle University; or publicly disclosing a person's personally identifiable information without authorization or consent.

d. Failure to Comply/Process Interference:

The following also constitute violations of this Policy:

▪ Intentional failure to comply with the reasonable directives of the Title IX Coordinator in the performance of their official duties, including with the terms of a no contact order.
▪ Intentional failure to comply with emergency removal or interim suspension terms. ▪ Intentional failure to comply with sanctions.
▪ Intentional failure to adhere to the terms of an agreement achieved through informal resolution.
▪ Intentional failure to comply with mandated reporting duties as defined in this Policy.
▪ Intentional interference with the Title IX resolution process, including but not limited to:

- Destruction of or concealing of evidence
- Actual or attempted solicitation of knowingly false testimony or providing false testimony or evidence.
- Intimidating or bribing a witness or party.

B. Other Definitions:

Admission: selection for part-time, full-time, special, associate, transfer, exchange, or any other enrollment, membership, or matriculation in or at an education program or activity operated by Seattle University.

Advisor: means a person chosen by a party or appointed by the university to accompany the Party to meetings related to the Resolution Process and/or to advise the party on that process, and (under Process A) to conduct questioning for the party at the hearing, if any.

Applicant: means one who submits an application, request, or plan required to be approved by Seattle University as a condition of becoming a student or employee.

Co-Curricular Activities: activities, programs, and learning experiences that complement students' academic programs and are sponsored by the University. Co-curricular activities include, but are not limited to registered student organizations and clubs, athletics (Division I and club), honor societies and academic cohorts, and school publications.

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

Confidential employee:

- An employee of Seattle University whose communications are privileged or confidential under Federal or State law. The employee's confidential status is only with respect to information received while the employee is functioning within the scope of their duties to which privilege or confidentiality applies;
- An employee of Seattle University who has been designated as confidential for the purpose of providing services to persons related to sex discrimination. If the employee also has a duty not associated with providing those services, the employee's confidential status is only with respect to information received about sex discrimination in connection with providing those services; or
- An employee of Seattle University who is conducting an Institutional Review Board approved human-subjects research study designed to gather information about sex discrimination—but the employee's confidential status is only with respect to information with respect to information received while conducting the study.

Consent: means knowing, voluntary, and clear permission, through word or action, to engage in mutually agreed upon sexual activity or contact. Consent is not demonstrated by silence or the absence of resistance. While resistance is not required or necessary, it is a clear demonstration of non-consent. Consent must be ongoing, and it may be withdrawn at any time when the withdrawal is reasonably and clearly communicated. If consent is withdrawn, sexual activity should cease within a reasonably immediate time. Consent to one form of sexual activity or contact does not imply consent to others, nor does past consent imply present or future consent. Consent to engage in sexual activity or contact with one person does not imply consent to engage in sexual activity or contact with another person or the same person in the future. Moreover, a current or previous intimate relationship is not sufficient to constitute consent.

Individuals may perceive and experience the same interaction in different ways. Therefore, it is the responsibility of each party to determine that the other has consented before engaging in the activity. Consent is evaluated from the perspective of what a reasonable person would conclude are mutually understandable words or actions. Reasonable reciprocation can establish consent. For example, if someone kisses you, you can kiss them back (if you want to) without the need to explicitly obtain their consent to be kissed back.

If consent is not clearly communicated prior to engaging in the activity, consent may be given by word or action at some point during the interaction or thereafter, but clear communication from the outset is strongly encouraged.

Additionally, going beyond the boundaries of consent is prohibited. Therefore, consent to some sexual contact (such as kissing or fondling) cannot be assumed to be consent for other sexual activity (such as intercourse). Moreover, unless a sexual partner has expressly consented to physical roughness, such as slapping, hitting, hair-pulling, strangulation, or other physical roughness during otherwise consensual sex, those acts may constitute dating violence or sexual assault, and if an individual expresses conditions on their willingness to consent (e.g.,

use of a condom) or limitations on the scope of their consent, those conditions and limitations must be respected. A failure to honor such limitations or expectations can constitute sexual assault.

Consent cannot result from the use of coercion, intimidation, force, or threats. Additionally, consent cannot be obtained from an individual who is incapable of giving consent because the person:

- Is under the legal age to give consent (16 years of age in Washington); or
- Has a mental, intellectual, or physical disability that renders them incapable of giving consent; or
- Is otherwise incapacitated (as defined below), including through the consumption of alcohol or other drugs.

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

Counter-Complaint: means a Complaint made in response to an initial Complaint a Respondent to the initial Complaint.

Course of Conduct: two or more intentional acts, including but not limited to, acts in which a person directly, indirectly, or through third parties, by any action, method, device, or means, follows, monitors, surveils, threatens, contacts, or attempts to contact another person, or interferes with another person's property.

Day: means a business day when Seattle University is normal operation.

Decision-maker: refers to those who have decision-making and/or sanctioning authority within Seattle University's Resolution Process for alleged violations of this Policy.

Directly Related Evidence: is evidence connected to the complaint, but which is neither inculpatory (tending to prove a violation) nor exculpatory (tending to disprove a violation) and cannot be relied upon by the Decision-Maker. Compare to Relevant Evidence, below.

Education Program or Activity: means locations, events, or circumstances where Seattle University exercises substantial control over both the Respondent and the context in which the harassment, discrimination, and/or retaliation occurs and also includes an building owned or controlled by a student organization that is officially recognized by Seattle University.

Employee: means a person employed by Seattle University either full- or part-time, including faculty members, and including student employees when acting within the scope of their employment.

Final Determination: means a conclusion by the standard of proof that the alleged conduct did or did not violate policy.

Finding: means a conclusion by the standard of proof that the alleged conduct did or did not occur as alleged (as in a "finding of fact").

Force: is the use of physical violence and/or physical imposition to gain sexual access. Sexual activity that is forced is, by definition, non-consensual, but non-consensual sexual activity is not necessarily forced. Force is conduct that, if sufficiently severe, can negate consent. Force also includes threats, intimidation (implied threats), and coercion that is intended to overcome resistance or produce consent (e.g., "Have sex with me or I'll hit you," which elicits the response, "Okay, don't hit me. I'll do what you want.").

Formal Complaint: means a document submitted or signed by a Complainant or signed by the Title IX Coordinator alleging a Respondent engaged in sexual harassment or retaliation for engaging in a protected activity and requesting that Seattle University investigate the allegation(s).

Formal Grievance Process: means "Process A," a method of formal resolution designated by Seattle University to address conduct that falls within the policies included, and which complies with the requirements of the Title IX regulations (34 C.F.R. § 106.45) and the Violence Against Women Act § 304.

Gender Identity or Gender Expression: includes intersex, nonbinary, transgender, agender, two-spirit, and gender-diverse people.

Harm/Endangerment:

- threatening or causing physical harm; or
- extreme verbal, emotional, or psychological abuse; or
- other conduct which threatens or endangers the health or safety of any person or damages their property.

Incapacitation (or incapacity or incapacitated): A state in which a person is incapable of giving consent. An incapacitated person cannot make rational, reasonable decisions because they lack the capacity to give knowing or informed consent (e.g., to understand the "who, what, when, where, why, and how" of an 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 because of alcohol or other drug consumption.

This definition also includes situations in which a person is suffering 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. If the Respondent neither knew nor should have known the Complainant to be physically or mentally

incapacitated, the Respondent is not in violation of this Policy. “Should have known” is an objective, reasonable person standard that assumes that a reasonable person is both sober and exercising sound judgment.

Intimidation: Implied threats or acts that cause the listener reasonable fear of harm.

Investigator: means the person authorized by Seattle University to gather facts about an alleged violation of this Policy, assess relevance and credibility, synthesize the evidence, and compile this information into an investigation report.

Knowledge: means when Seattle University receives notice of conduct that reasonably may constitute sexual harassment, discrimination, or retaliation in its education program or activity.

Notice: means when an employee, student, or third party informs the Title IX Coordinator or other Official with Authority of the alleged occurrence of discriminatory, harassing, and/or retaliatory conduct.

Official with Authority (OWA): means a Seattle University employee who has responsibility to implement corrective measures for sexual harassment and/or retaliation on behalf of Seattle University.

Party: means a Complainant or Respondent.

Peer Retaliation: means Retaliation by a student against another student.

Pregnancy or related conditions:

- Pregnancy, childbirth, termination of pregnancy, or lactation;
- Medical conditions related to pregnancy, childbirth, termination of pregnancy, or lactation; or
- Recovery from pregnancy, childbirth, termination of pregnancy, lactation, or related medical conditions.

Privacy: means that information related to a complaint will be shared with a limited number of Seattle University employees who “need to know” in order to assist in providing supportive measures or evaluating, investigating, or resolving a Complaint, as determined in Seattle University’s sole discretion.

Process A: means the Formal Grievance Process outlined in Appendix A.

Process B: means the administrative resolution process detailed in Appendix A that only applies when Process A does not, as determined by the Title IX Coordinator.

Reasonable Person: A reasonable person under similar circumstances and with similar identities to the Complainant.

Recognized Student Club: means a group of students with a designated purpose that has fulfilled all the requirements necessary for recognition status as set forth by the Center for Student Involvement for the set academic year.

Recognized Student Organization: means a group of students with a designated purpose that is institutionally supported like an arm of an office (i.e. student government).

Relevant: related to the allegations of sex discrimination under investigation as part of the grievance procedures. Questions are relevant when they seek evidence that may aid in showing whether the alleged sex discrimination occurred, and evidence is relevant when it may aid a decision maker in determining whether the allege sex discrimination occurred.

Relevant Evidence: is evidence that tends to prove (inculpatory) or disprove (exculpatory) an issue in the complaint.

Remedies: measures provided, as appropriate, to a complainant or any other person Seattle University identifies as having had their equal access to Seattle University's education program or activity limited or denied by sex discrimination. These measures are provided to restore or preserve that person's access to Seattle University's education program or activity after Seattle University determines that sex discrimination occurred.

Respondent: a person who is alleged to have violated Seattle University's prohibition on sex discrimination.

Sanction: a consequence imposed on a Respondent who is found to have violated this Policy.

Sex: includes sex assigned at birth, sex stereotypes, sex characteristics, pregnancy or related conditions, sexual orientation, and gender identity.

Sexual Contact: (1) intentional sexual touching of another person's breasts, buttocks, or genitals, whether clothed or unclothed, or over or under clothing (including intentional touching with ejaculate); (2) intentional sexual touching with one's breast, buttocks, or genitals (including touching with ejaculate); (3) making a person touch another person or themselves with or on any of the foregoing body parts; and/or (4) vaginal or anal penetration or contact by any body part or an object.

Sex- or Gender-Based: (1) Sexual or romantic in nature; or (2) committed by a current or former partner of an intimate, romantic, or sexual nature; or (3) related to the Complainant's actual or perceived sex or sexual orientation. In the case of Other (Non-Title IX) Sexual and Gender-Based Misconduct, this also includes gender identity or gender expression (including the Complainant's exhibiting or failing to conform to traditional notions of femininity and masculinity).

Student: means a person who has gained admission to Seattle University, or who is registered or enrolled for credit or non-credit bearing coursework, and who maintains an ongoing educational relationship with Seattle University.

Supportive Measures: means individualized measures offered as appropriate, as reasonably available, without unreasonably burdening a complainant or respondent, not for punitive or disciplinary reasons, and without fee or charge to the complainant or respondent to:

- Restore or preserve that party's access to Seattle University's education program or activity, including measures that are designed to protect the safety of the parties or Seattle University's educational environment; or
- Provide support during the grievance procedures, or during the informal resolution process.

Title IX Coordinator: is the official designated by Seattle University to ensure compliance with Title IX and Seattle University's Title IX program. References to the Coordinator throughout this policy may also encompass a designee of the Coordinator for specific tasks.

Title IX Partners: The Title IX Coordinator and any Investigators, Decision-makers, University Provided Advisors, Informal Resolution Facilitators, or other individuals trained to serve in a role that aids in the Resolution Process.

University Program or Activity ("Program or Activity"): (1) any location, event, or circumstance where the University exercises substantial control over both the Respondent and the context in which the conduct occurs; (2) any building owned or controlled by a Student Organization recognized by the University; and (3) a University campus. Conduct that occurs off campus in locations or at events with no connection to the University is unlikely to occur in a Program or Activity of the University.

V. POLICY REQUIREMENTS

A. Prohibited Conduct

Students, employees (including faculty, staff, and Jesuits-in-residence or Jesuit volunteers), and administrators are entitled to an employment and educational environment that is free of discrimination, harassment, and retaliation. Therefore, engaging in any of the prohibited conduct described in Section IV(A) is a violation of this Policy. This Policy is not meant to inhibit or prohibit educational content or discussions inside or outside of the classroom that include germane but controversial or sensitive subject matters protected by academic freedom.

The sections above describe the specific forms of legally prohibited discrimination, harassment, and retaliation that are also prohibited under Seattle University Policy. When speech or conduct is protected by academic freedom, it will not be considered a violation of Policy, though Supportive Measures will be offered to those impacted.

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

other Informal Resolution mechanisms. For assistance with Alternative Resolution and other Informal Resolution techniques and approaches, contact the Title IX Coordinator.

B. Seattle University Administrative Contact Information

Seattle University has appointed Dr. Elizabeth Trayner as the Title IX Coordinator to coordinate Seattle University's compliance with federal, state, and local civil rights laws and ordinances.

Elizabeth Trayner, Ed.D.
Assistant Vice President for Institutional Equity/Title IX Coordinator/504 Coordinator
Office of Institutional Equity
Loyola 300
901 12th Avenue
Seattle, Washington 98122
206-220-8515
oie@seattleu.edu
www.seattleu.edu/equity

Seattle University has determined that the following administrators are Officials with Authority (OWAs) to address and correct harassment, discrimination and/or retaliation. In addition to the Title IX Coordinator listed above, these OWAs may also accept notice or complaints on behalf of Seattle University.

- All Members of the President's Round Table
- Vice Provost for Student and Campus Life
- Dean of Students

C. External Contact Information

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

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

OR

Office for Civil Rights (OCR)
Central Building
810 3rd Ave., Ste. 750
Seattle, WA 98104-1627
or: https://seattle.gov/civilrights/file-complaint

For Complaints involving employee-on-employee conduct: Equal Employment Opportunity Commission (EEOC).

D. Mandated Reporting and Confidential Employees

1. Mandated Reporters

All Seattle University faculty and staff (including student employees), other than those deemed Confidential Employees, are Mandated Reporters and are required to promptly report all known violations of this Policy, although there are some limited exceptions. Supportive measures may be offered as the result of such disclosures without formal Seattle University action.

Complainants may want to carefully consider whether they share personally identifiable information details with Mandated Reporters, as those details must be shared with the Title IX Coordinator.

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

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

Failure of a Mandated Reporter, as described in this section, to report an incident of which they become aware is a violation of Seattle University Policy and can be subject to disciplinary action for failure to comply/failure to report. This also includes situations when a person engaging in potentially harassing behavior is themself a Mandated Reporter. Such individuals are obligated to report their own misconduct, and failure to do so is a chargeable offense under this Policy.

2. Confidential Employees

To enable Complainants to access support and resources without filing a Complaint and initiating the complaint resolution process, Seattle University has designated specific employees as Confidential Employees. Those designated by Seattle University as Confidential Employees are not required to report actual or suspected discrimination, harassment, or retaliation in a way that identifies the Parties. They will, however, provide the Complainant with

the Title IX Coordinator's contact information and offer options and resources without any obligation to inform an outside agency or Seattle University official unless a Complainant has requested that the information be shared.

Confidential Employees are: 1) Those with confidentiality bestowed by law or professional ethics, such as lawyers, medical professionals, clergy, and counselors; 2) Those whom Seattle University has specifically designated as confidential for purposes of providing support and resources to the Complainant; and 3) Those conducting human subjects research as part of a study approved by Seattle University's Institutional Review Board. For confidentiality to apply, the individual must be in a confidential relationship with the person reporting at the time of receiving Notice.

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

- Counseling and Psychological Services (CAPS) (Students)
- Student Health Center (Students)
- University Ministry working within the scope of their ministerial role
- Seattle University Law School Clinics (Clients)
- Seattle University Ombudsperson (Employees)

The employees falling within one of the categories of confidential employees, above, will maintain confidentiality except in extreme cases of immediacy or threat or danger or abuse of a minor, elder, or individual with a disability, or when required to disclose by law or court order.

Confidential employees who receive Notice within the scope of their confidential roles will timely submit anonymous statistical information for Clery Act purposes unless they believe it would be harmful to their client, patient, visitor, or parishioner.

3. Unaffiliated Third Parties

In addition, Complainants may speak with individuals unaffiliated with Seattle University without concern that this Policy will require them to disclose information to the institution without permission. Such individuals may include:

- External, licensed professional counselors and other medical providers
- Local rape crisis counselors
- Domestic violence resources
- Local or state assistance agencies
- External clergy members/chaplains
- Non-University Attorneys
- Service providers providing services through the University's Employee Assistance Program
- Service providers providing services through TimelyCare and TimelyMD
- External Sports Medicine Doctors or Sports Medicine Psychologists.

E. Reports and Complaints of Violations of this Policy

1. Reports and Complaints

A Report provides Notice to Seattle University of an allegation or concern about violations of this Policy and provides an opportunity for the Title IX Coordinator to provide information, resources, and supportive measures. A Complaint provides Notice to Seattle University that the Complainant would like to initiate an investigation or other appropriate resolution procedures pursuant to the Resolution Process attached at Appendix A.

Reporting carries no obligation to initiate a Complaint, and in most situations, Seattle University is able to respect a Complainant's request to not initiate a resolution process. However, there may be circumstances in which Seattle University needs to initiate a resolution process even where the Complainant does not wish to do so. Such circumstances include a pattern of behavior, allegations of severe misconduct, or a compelling threat to the health and/or safety of the University or University community members. If a Complainant does not wish to file a Complaint, Seattle University will maintain the privacy of information to the extent possible. The Complainant should not fear a loss of confidentiality by giving Notice, because doing so allows Seattle University to discuss and/or provide supportive measures, in most circumstances. A Complainant or other individual may initially make a Report and may decide at a later time to file a Complaint.

2. How to Make a Report or Complaint

Reports or Complaints of discrimination, harassment, and/or retaliation may be made using any of the following options:

a. Making a report or giving verbal Notice directly to, the Title IX Coordinator. A report may be made at any time (including during non-business hours) by using the telephone number, email address, or mail to the office of the Title IX Coordinator provided in subsection B, above. A Formal Complaint may be filed in writing with the Title IX Coordinator. Filing a report does not require the initiation of a Formal Complaint. As discussed above, filing a Complaint will initiate the Resolution Process described in Appendix A.
b. Submitting an online Report at: General Referral Form. You may submit anonymous Report, but doing so may give rise to a need to try to determine the Parties' identities. Although measures intended to protect the community or redress or mitigate harm may be enacted, anonymous Report typically limits the University's ability to investigate, respond, and provide remedies, depending on what information is shared. It also may not be possible to provide supportive measures to Complainants who are the subject of anonymous Reports. Reporting carries no obligation to initiate a Complaint, and in most situations, Seattle University is able to respect a Complainant's request to not initiate a resolution process. However, there may be circumstances, such as pattern behavior, allegations of severe misconduct, or a compelling threat to health and/or safety, where Seattle University

may need to initiate a resolution process. If a Complainant does not wish to file a Complaint, Seattle University will maintain the privacy of information to the extent possible. The Complainant should not fear a loss of confidentiality by giving Notice that allows Seattle University to discuss and/or provide supportive measures, in most circumstances.

c. Making an anonymous report, contact EthicsPoint: EthicsPoint – a secure reporting tool, with the option to file anonymously 1-888-393-6824 or https://secure.ethicspoint.com/domain/media/en/gui/23241/index.html.
d. For incidents involving students, you may also contact the Office of the Dean of Students: https://www.seattleu.edu/deanofstudents/ 206-296-6060 | deanofstudents@ seattleu.edu | STCN 140.
e. For incidents involving a faculty or staff member, you may also contact Human Resources: https://www.seattleu.edu/hr/ 206-296-5870 |mailto:hr@seattleu.edu | CLMB 103.
f. For emergency and after-hours assistance, contact: Campus Public Safety https://www.seattleu.edu/safety/ 206-296-5911 (emergency) or 206-296-5990 (non-emergency).

As used in this Policy, the term "Formal Complaint" means a document or electronic submission (such as by email or through an online portal provided by Seattle University for this purpose) that contains the Complainant's physical or digital signature, or otherwise indicates that the Complainant is the person filing the complaint, and requests that Seattle University investigate the allegations. If notice is submitted in a form that does not meet this standard, the Title IX Coordinator will contact the Complainant to ensure that it is filed correctly.

4. Time Limits on Reporting

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

Acting on Notice/Complaints significantly impacted by the passage of time (including, but not limited to, the rescission or revision of Policy) is at the 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.

F. Supportive Measures

Seattle University, through the Title IX Coordinator, will promptly offer and implement appropriate and reasonable supportive measures to the Parties upon Notice of alleged discrimination, harassment, and/or retaliation. Supportive measures are offered, without fee or charge to the Parties, to restore or preserve access to Seattle University's education program or activity, and include measures designed to protect the safety of all Parties and/or Seattle University's educational environment and/or to deter discrimination, harassment, and/or retaliation.

At the time that supportive measures are offered, if a Complaint has not been filed, Seattle University will inform the Complainant, in writing, that they may file a Complaint with Seattle University either at that time or in the future. The Title IX Coordinator will work with a party to ensure that their wishes are considered with respect to any planned and implemented supportive measures.

Seattle University will maintain the privacy of the supportive measures, unless (1) doing so impairs Seattle University's ability to provide the supportive measures; (2) it is necessary to disclose the supportive measures to preserve or restore a party's access to the education program or activity; or (3) upon receipt of consent to disclosure from the party receiving the supportive measures.

Seattle University will act to ensure as minimal an academic/occupational impact on the Parties as possible. Seattle University will implement measures in a way that does not unreasonably burden any party.

Supportive measures may include, but are not limited to:

- Referral to counseling, medical, and/or other healthcare services
- Referral to the Employee Assistance Program
- Referral to community-based service providers
- Visa and immigration assistance referral
- Referral for Student financial aid counseling
- Education to the institutional community or community subgroup(s)
- Altering campus housing assignment(s)
- Altering work arrangements for employees or student-employees
- Safety planning
- Providing campus safety escorts
- Providing transportation assistance
- Implementing contact limitations (no contact orders) between the Parties
- Academic support, extensions of deadlines, or other course/program-related adjustments
- Trespass or Be-On-the-Lookout (BOLO) orders
- Timely warnings
- Class schedule modifications, withdrawals, or leaves of absence
- Increased security and monitoring of certain areas of the campus
- Any other actions deemed appropriate by the Title IX Coordinator

Violations of no contact orders or other restrictions may be referred to appropriate student or employee conduct processes for enforcement or added as collateral misconduct allegations to an ongoing Complaint under this Policy.

The Parties may seek modification or reversal of Seattle University's decision to provide, deny, modify, or terminate supportive measures applicable to them. A request for such a modification 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 definition of supportive measures. Seattle University will also provide the Parties with the opportunity to seek additional modification or termination of supportive measures applicable to them if circumstances change materially. Seattle University typically renders decisions on supportive measures within seven (7) business days of receiving a request and provides a written determination to the impacted party(ies) and the Title X Coordinator.

G. False Allegations and Evidence

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

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

H. Confidentiality and Privacy

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

I. Unauthorized Disclosure of Information

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

J. Emergency Removal, Interim Actions, and Leave

Seattle University can act to remove a student Respondent accused of sex-based discrimination or harassment from its education program or activities, partially or entirely, on an emergency basis when an individualized safety and risk analysis has determined that an immediate threat to the physical health or safety of any student or other individual justifies removal. This risk analysis is performed by the Title IX Coordinator and may be done in

conjunction with the Threat Assessment Team using its standard objective violence risk assessment procedures. Employees are subject to existing policies and procedures for interim actions and leaves.

K. Federal Timely Warning Obligations

Seattle University will follow its standard legal obligations and policies for warning community members when there is an incident that poses a serious or continuing threat of bodily harm or danger to the members of the community.

L. Redhawks Care (Amnesty)

1. Students

At Seattle University, the health, safety, and welfare of our students and community are paramount concerns. All students are expected to inform appropriate officials in the event of any health or safety risk or emergency—including those involving alcohol or drug use—even if violations of the Code of Student Conduct may have occurred in connection with such a risk or emergency. Because the University understands that concern about possible disciplinary action may deter requests for emergency assistance, the University has adopted the Redhawks Care Policy to alleviate such concerns and promote responsible action on the part of students.

Therefore, in a situation involving threat or danger to the health or safety of any individual(s), students are expected to:

1. Contact the Department of Public Safety ("DPS") by calling 5-911 and/or 911 to report the incident on-campus and 911 off-campus;
2. Remain with the individual(s) needing emergency treatment and cooperate with emergency officials, and;
3. Meet with appropriate University officials after the incident and cooperate with Integrity Formation/Office of Institutional Equity procedures following the incident.

To encourage reporting and participation in the process, the University may offer amnesty from minor policy violations, such as underage alcohol consumption or the use of illicit drugs, related to the incident. Granting amnesty is a discretionary decision made by the Office of the Dean of Students, and amnesty does not apply to more serious allegations, such as physical abuse of another or illicit drug distribution. The Office of the Dean of Students will consider the positive impact of taking responsible action in an emergency situation by the reporting student and/or the impact of the emergency on the impacted student when determining the appropriate response for alleged violations of the Code. This response can include not initiating an integrity formation process for a student. The policy does not preclude or prevent actions by police or other legal authorities.

A student's failure to take responsible action in a risk or emergency situation, however, may void all protections under this provision, may constitute an aggravating factor for purposes of

sanctioning, and may lead to further disciplinary actions when such failure to act otherwise constitutes a violation of University rules, regulations or policies.

2. Employees

Sometimes, employees are hesitant to report discrimination, harassment, or retaliation they have experienced for fear of getting in trouble themselves. Seattle University may, at its discretion, offer employee Complainants amnesty from such policy violations (typically more minor policy violations) related to the incident. Amnesty may also be granted to Respondents and witnesses on a case-by-case basis.

M. Independence and Conflicts of Interest

The Title IX Coordinator manages this Policy and related Processes and acts with independence and authority, free from bias and conflicts of interest. The Title IX Coordinator oversees all resolutions under this Policy and Processes. Title IX Partners are vetted and trained to ensure they are not biased for or against any party in a specific Complaint, or for or against Complainants and/or Respondents, generally.

To raise any concern involving bias, conflict of interest, misconduct, or discrimination by the Title IX Coordinator, contact the Vice President for Diversity and Inclusion at:

Natasha Martin, J.D.
Vice President for Diversity and Inclusion
nmartin@seattleu.edu
(206) 296-6263

Concerns of bias, misconduct, discrimination, or a potential conflict of interest by any other Title IX Partner should be raised with the Title IX Coordinator.

VI. VIOLATIONS

Violations of this Policy are resolved through the Resolution Process attached as Appendix A.

A. Standard of Proof

As explained in the Resolution Process (Appendix A), Seattle University uses the preponderance of the evidence standard of proof when determining whether a Policy violation occurred. This means that Seattle University will decide whether it is more likely than not, based upon the available information at the time of the decision, that the Respondent is in violation of the alleged Policy violation(s). Respondents are presumed not responsible for alleged sex discrimination until a determination is made at the conclusion of the Resolution Process.

B. Sanction Range

Sanctions for violations of this Policy range from warning through dismissal/termination. There may also be appropriate educational sanctions assigned in for any of the above violations.

VII. RELATED INFORMATION

Item	Description
University Lings	**Student Code of Conduct** **Human Resources Policies** **Non-Discrimination Policy** **Policy Prohibiting Discrimination Based on Parental, Family or Marital Status, or Pregnancy or Related Conditions**
Forms	**Ethics Point Report** **Reporting Form**
Related Links	**Office of Institutional Equity** **Resources – Get Help** **VAWA Brochure**
Procedures	**Appendix A: Resolution Process**

8.1 Appendix A: Resolution Process

I. PRELIMINARY RESOLUTION STEPS

A. Overview

Except in cases concerning alleged sexual harassment involving only employees (which are resolved pursuant to the Human Resources Sexual Harassment Policy), Seattle University will act on any Notice/Complaint of a potential violation of the Policy Prohibiting Sexual Harassment, Discrimination, and Retaliation (the "Policy") that is received by the Title IX Coordinator or any other Official with Authority by applying the appropriate Resolution Process—known as either "Process A" or "Process B"—as determined by the Title IX Coordinator.

Subject to the above limitation regarding alleged sexual harassment involving only employees, in general, if some or all of the allegations in a complaint relate to the protections of Title IX as described in the 2020 Title IX Federal Regulations (defined as "Title IX Sex-Based Misconduct" in the Policy), then all allegations in the Complaint are resolved using Process A. All other Complaints under the Policy are resolved through Process B. Within the 2020 Title IX regulations, a set of technical dismissal requirements may apply as described below, but when a technical dismissal under the Title IX regulations is required, any remaining applicable allegations will proceed using the appropriate procedures, which may include resolution pursuant to Process B.

Process B can also apply to sexual harassment (including sexual assault, dating violence, domestic violence, and stalking, as defined above) when jurisdiction does not fall within Process A, as determined by the Title IX Coordinator.

Unionized/other categorized employees are subject to the terms of their agreements/employees' rights to the extent those agreements do not conflict with federal or state compliance obligations. The Title IX Coordinator is responsible for coordinating the University's compliance with this Process.

B. Collateral Misconduct

Collateral Misconduct is defined to include potential violations of other Seattle University policies not incorporated into the Policy that occur in conjunction with alleged violations of the Policy, or that arise through the course of the investigation, for which it makes sense to provide one resolution for all alleged misconduct. Thus, the collateral allegations may be included along with potential violations of the Policy, to be resolved jointly under the Resolution Processes described in this document. In such circumstances, the Title IX Coordinator may consult with Seattle University officials who typically oversee such conduct (e.g., Human Resources, Integrity Formation, Academic Affairs) to solicit input as needed on what potential violations should be included, but doing so is within the discretion of the Title IX Coordinator. All other allegations of misconduct unrelated to incidents covered by the Policy will typically be addressed separately through procedures described in the Code of Student Conduct, Faculty Handbook, and Human Resources Policies.

C. Notice/Complaint

Upon receipt of a Formal Complaint or notice of an alleged policy violation by the Title IX Coordinator, the Title IX Coordinator initiates a prompt initial assessment to determine the next steps Seattle University needs to take. The Title IX Coordinator will contact the Complainant to offer supportive measures and determine whether the Complainant wishes to file a Formal Complaint.

The Title IX Coordinator will then initiate at least one of three responses:

1) Offering supportive measures

2) An Informal Resolution (upon submission of a Formal Complaint if Process A applies)

3) A Formal Grievance Process including an investigation and a hearing (upon submission of a Formal Complaint if Process A applies)

Seattle University uses a Formal Grievance Process as described below to determine whether the Policy has been violated. If so, Seattle University will promptly implement effective remedies designed to ensure that it is not deliberately indifferent to harassment or discrimination, their potential recurrence, and/or their effects.

D. Initial Assessment

Upon receipt of Notice, or a Formal Complaint of an alleged Policy violation, the Title IX Coordinator engages in an initial assessment, typically within seven (7) business days. The initial evaluation typically includes:

- The Title IX Coordinator seeks to determine if the person impacted wishes to make a Formal Complaint, and will assist them to do so, if desired.
    - If they do not wish to do so, the Title IX Coordinator determines whether to initiate a complaint themselves.
- If a Formal Complaint is received, the Title IX Coordinator assesses its sufficiency and works with the Complainant to make sure it is correctly completed.
- The Title IX Coordinator reaches out to the Complainant to offer supportive measures.
- The Title IX Coordinator works with the Complainant to ensure they are aware of the right to have an Advisor.
- The Title IX Coordinator works with the Complainant to determine whether the Complainant prefers a supportive and remedial response, an Informal Resolution option, or a formal investigation and grievance process.
    - If a supportive and remedial response is preferred, the Title IX Coordinator works with the Complainant to identify their needs, determine appropriate supports, and implements them accordingly. If no Formal Grievance Process is initiated initially, the Complainant can elect to initiate one later, if desired.
    - If an Informal Resolution option is preferred, the Title IX Coordinator assesses whether the complaint is suitable for Informal Resolution1 and which informal mechanism may serve the situation best or is available, and may seek to determine if the Respondent is also willing to engage in Informal Resolution.
    - If a Formal Grievance Process is preferred by the Complainant or the complaint is not suitable for Informal Resolution, the Title IX Coordinator determines if the alleged misconduct falls within the scope of the 2020 Title IX regulations (i.e., is "Title IX Sex-Based Misconduct" under the Policy):
- If the Title IX Coordinator determines that the alleged misconduct is Title IX Sex-Based Misconduct under the Policy, the Title IX Coordinator will initiate the formal investigation and grievance process, directing the investigation to address, based on the nature of the complaint:
    - an incident, and/or
    - a pattern of alleged misconduct, and/or
    - a culture/climate issue
- If the Title IX Coordinator determines that the alleged misconduct is not Title IX Sex-Based Misconduct, the Title IX Coordinator will "dismiss" that aspect of the complaint, if any, and then assesses which policies may apply, which Resolution Process is applicable, and will refer the matter accordingly, including referring the matter for resolution under Process B, if applicable, or for resolution under the Human Resources Sexual Harassment Policy. Please note that dismissing a complaint under the 2020 Title

IX regulations is solely a procedural requirement under Title IX, which does not limit Seattle University's authority to address a complaint with an appropriate process and remedies, including Process B, if appropriate.

E. Violence Risk Assessment

In some cases, the Title IX Coordinator may determine that a Violence Risk Assessment (VRA) should be conducted by the University's Threat Assessment Team as part of the initial assessment.

A VRA authorized by the Title IX Coordinator should occur in collaboration with the threat assessment team. Where a VRA is required by the Title IX Coordinator, a Respondent refusing to cooperate may result in a charge of failure to comply within the appropriate student or employee conduct process.

A VRA assesses the risk of actionable violence, often with a focus on targeted/predatory escalations.

F. Dismissal (Mandatory and Discretionary)

Under the 2020 Title IX regulations, Seattle University must dismiss a Formal Complaint or any allegations therein if, at any time during the investigation or hearing, it is determined that:

1. The conduct alleged in the Formal Complaint would not constitute Title IX Sex-Based Misconduct, even if proved;

2. The conduct did not occur in an educational program or activity controlled by Seattle University (including buildings or property controlled by recognized student organizations), and/or Seattle University does not have control of the Respondent;

3. The conduct did not occur against a person in the United States; or

4. At the time of filing a Formal Complaint, a Complainant is not participating in or attempting to participate in Seattle University's education program or activity, and based on the available information, the Title IX Coordinator has determined that they do not need to sign a Formal Complaint on behalf of Seattle University.

Seattle University may dismiss a Formal Complaint or any allegations therein if, at any time during the investigation or hearing:

1. A Complainant notifies the Title IX Coordinator in writing that the Complainant would like to withdraw the Formal Complaint or any allegations therein;

2. The Respondent is no longer enrolled in or employed by Seattle University; or

3. Specific circumstances prevent the recipient from gathering evidence sufficient to reach a determination as to the Formal Complaint or allegations therein.

A Complainant who withdraws a complaint may later request to reinstate it or refile it.

Upon any dismissal, Seattle University will promptly send written notice of the dismissal and the rationale for doing so simultaneously to the parties.

This dismissal decision is appealable by any party under the procedures for appeal, below. The decision to not dismiss is also appealable by any party claiming that a dismissal is required or appropriate.

When a technical dismissal under the 2020 Title IX regulations is required for some of the allegations, any remaining applicable allegations will proceed utilizing Process A or the Human Resources Sexual Harassment Policy, as applicable. If all allegations are technically dismissed, Seattle University will proceed with Process B (or the Human Resources Sexual Harassment Policy) for any remaining allegations related to the Policy. Process B can also apply to Sexual Harassment (including Sexual Assault, Dating Violence, Domestic Violence, and Stalking) when jurisdiction does not fall within Process A, as determined by the Title IX Coordinator.

G. Counterclaims

Seattle University is obligated to ensure that the grievance process is not abused for retaliatory purposes. Thus, counterclaims made with retaliatory intent are not permitted. Seattle University permits the filing of counterclaims but uses an initial assessment, described above, to assess whether the allegations in the counterclaim are made in good faith.

Counterclaims determined to have been reported in good faith will be processed using the applicable Resolution Process. Investigation of such claims may take place after resolution of the underlying initial complaint, in which case a delay may occur.

Counterclaims may also be resolved through the same investigation as the underlying complaint, at the discretion of the Title IX Coordinator. When counterclaims are not made in good faith, they will be considered retaliatory and may constitute a violation of this policy.

H. Advisors in the Resolution Process

The parties may each have an Advisor of their choice present with them for all meetings, interviews, and hearings within the Resolution Process, if they so choose. The parties may select whoever they wish to serve as their Advisor as long as the Advisor is eligible and available. Choosing an Advisor who is also a witness in the process creates potential for bias and conflict of interest. A party who chooses an Advisor who is also a witness can anticipate that issues of potential bias will be explored by the hearing Decision-maker. Seattle University may permit parties to have more than one Advisor upon special request to the Title IX Coordinator. The decision to grant this request is at the sole discretion of the Title IX Coordinator and will be granted equitably to all parties.

1. Who Can Serve as an Advisor

The Advisor may be a friend, mentor, family member, attorney, or any other individual a party chooses to advise, support, and/or consult with them throughout the Resolution Process. The parties may choose Advisors from inside or outside of the Seattle University community. The Title IX Coordinator will also offer to assign a trained Advisor to any party if the party so chooses. If the parties choose an Advisor from the pool available from Seattle University, the

Advisor will have been trained by Seattle University and be familiar with the University's Resolution Process.

If a party chooses an Advisor from outside the pool of those identified by Seattle University, the Advisor may not have been trained by Seattle University and may not be familiar with Seattle University policies and procedures.

Parties also have the right to choose not to have an Advisor in the initial stages of the Resolution Process, prior to a hearing under Process A.

2. Advisor's Role in Meetings and Interviews

The parties may be accompanied by their Advisor in all meetings and interviews at which the party is entitled to be present, including intake. Advisors should help the parties prepare for each meeting and are expected to advise ethically, with integrity, and in good faith.

Seattle University cannot guarantee equal Advisory rights, meaning that if one party selects an Advisor who is an attorney, but the other party does not retain or cannot afford an attorney, Seattle University is not obligated to provide an attorney.

3. Advisors in Hearings/Seattle-University-Provided Advisor

Under the 2020 Title IX Regulations (and therefore Process A), a form of indirect questioning is required during the hearing but must be conducted by the parties' Advisors. The parties are not permitted to directly question each other or any witnesses. If a party does not have an Advisor for a hearing, Seattle University will appoint a trained Advisor for the limited purpose of conducting any questioning of the parties and witnesses.

4. Advisor Violations of Seattle University Policy

All Advisors are subject to the same Seattle University policies and procedures, whether they are attorneys or not, and whether they are selected by a party or assigned by Seattle University. Advisors are expected to advise their advisees without disrupting proceedings. Advisors should not address Seattle University officials or Investigators in a meeting or interview unless invited to do so (e.g., asking procedural questions). The Advisor may not make a presentation or represent their advisee during any meeting or proceeding and may not speak on behalf of the advisee to the Investigator(s) or other Decision-maker(s) except during a hearing proceeding during questioning.

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

Any Advisor who oversteps their role as defined by this Policy, or who refuses to comply with Seattle University's established rules of decorum for the hearing, will be warned. If the Advisor continues to disrupt or otherwise fails to respect the limits of the Advisor role, the

meeting/interview/hearing may be ended, or other appropriate measures implemented, including Seattle University requiring the party to use a different Advisor or providing a different Seattle University-appointed Advisor. Subsequently, the Title IX Coordinator will determine how to address the Advisor's non-compliance and future role.

5. Sharing Information with the Advisor

Seattle University expects that the parties may wish to have Seattle University share documentation and evidence related to the allegations with their Advisors. Seattle University provides a consent form that authorizes Seattle University to share such information directly with a party's Advisor. The parties must either complete and submit this form to the Title IX Coordinator or provide similar documentation demonstrating consent to a release of information to the Advisor before Seattle University is able to share records with an Advisor. If a party requests that all communication be made through their attorney-Advisor, Seattle University will continue to communicate directly with the party but can copy the attorney-Advisor on all communication. Advisors appointed by the University will not be asked to disclose details of their interactions with their advisees.

6. Privacy of Records Shared with Advisor

Advisors are expected to maintain the privacy of the records shared with them. These records may not be shared with third parties, disclosed publicly, or used for purposes not explicitly authorized by Seattle University. Advisors may be asked to sign Non-Disclosure Agreements (NDAs). Seattle University may restrict the role of any Advisor who does not respect the sensitive nature of the process or who fails to abide by the Recipient's privacy expectations.

7. Expectation of an Advisor

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

Seattle University may also make reasonable provisions to allow an Advisor who cannot be present in person to attend a meeting, interview, or hearing by telephone, video conferencing, or other similar technologies as may be convenient and available.

8. Expectations of the Parties with Respect to Advisors

A party may elect to change Advisors during the process and is not obligated to use the same Advisor throughout. The parties are expected to inform the Investigator(s) of the identity of their Advisor at least three (3) business days before the date of their first meeting with Investigators (or as soon as possible if a more expeditious meeting is necessary or desired).

The parties are expected to provide timely notice to the Title IX Coordinator if they change Advisors at any time. It is assumed that if a party changes Advisors, consent to share information with the previous Advisor is terminated, and a release for the new Advisor should be secured. Parties are expected to inform the Title IX Coordinator of the identity of their hearing Advisor at least three (3) business days before the hearing.

9. Assistance in Securing an Advisor

Respondents may wish to contact organizations such as:

- Families Advocating for Campus Equality (http://www.facecampusequality.org)
- Stop Abusive and Violent Environments (http://www.saveservices.org)

Complainants may wish to contact organizations such as:

- The Victim Rights Law Center (http://www.victimrights.org)
- The National Center for Victims of Crime (http://www.victimsofcrime.org), which maintains the Crime Victim's Bar Association
- The Time's Up Legal Defense Fund (https://nwlc.org/times-up-legal-defense- fund/).

II. Title IX Sex-Based Misconduct Federal Regulations Process ("Process A")

A. Resolution Proceedings

Resolution proceedings are private. All persons present at any time during the Resolution Process are expected to maintain the privacy of the proceedings in accordance with Seattle University Policy.

Although there is an expectation of privacy around what Investigators share with parties during interviews, the parties have discretion to share their own knowledge and evidence with others if they so choose, except for information the parties agree not to disclose as part of an Informal Resolution. Seattle University encourages parties to discuss any sharing of information with their Advisors before doing so.

The Formal Grievance Process is Seattle University's primary resolution approach unless Informal Resolution is elected by all parties and Seattle University.

1. Informal Resolution

Three options for Informal Resolution are detailed in this section. They include:

a. **Supportive Resolution.** When the Title IX Coordinator can resolve the matter informally by providing supportive measures (only) to remedy the situation.

b. **Alternative Resolution.** When the parties agree to resolve the matter through an alternative resolution mechanism including mediation, restorative practices, facilitated dialogue, etc., often before a formal investigation takes place.
c. **Accepted Responsibility**. When the Respondent accepts responsibility for violating the Policy, and desires to accept the recommended sanction(s) and end the Resolution Process.

To initiate Informal Resolution, a Complainant must submit a Formal Complaint, as defined above. A Respondent who wishes to initiate Informal Resolution should contact the Title IX Coordinator.

The parties may agree, as a condition of engaging in Informal Resolution, that statements made, or evidence shared, during the Informal Resolution process will not be considered in the Formal Grievance Process unless all parties' consent.

It is not necessary to pursue Informal Resolution first in order to pursue a Formal Grievance Process, and any party participating in Informal Resolution can stop the process at any time and begin or resume the Formal Grievance Process. The parties may not enter into an agreement that requires Seattle University to impose specific sanctions, though the parties can agree to certain restrictions or other courses of action. For example, the parties cannot require a student be suspended, but the parties can agree that the Respondent will temporarily or permanently withdraw. The only Informal Resolution Process that can result in sanctions levied by the institution is "Accepted Responsibility." The Title IX Coordinator has discretion to determine if an investigation will be paused during Informal Resolution, or if it will be limited, or will continue during the Informal Resolution process.

Prior to implementing Informal Resolution, Seattle University will provide the parties with written notice of the reported misconduct and any sanctions (only in the case of Accepted Responsibility) or measures that may result from participating in such a process, including information regarding any records that will be maintained or shared by Seattle University. Seattle University will obtain voluntary, written confirmation that all parties wish to resolve the matter through Informal Resolution before proceeding and will not pressure the parties to participate in Informal Resolution.

2. Alternative Resolution Approaches

Alternative Resolution is an informal approach, including mediation, restorative practices, facilitated dialogue, etc. by which the parties reach a mutually agreed upon resolution of a complaint. All parties must consent to the use of an Alternative Resolution approach.

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

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

The ultimate determination of whether Alternative Resolution is available or successful is made by the Title IX Coordinator. The Title IX Coordinator is authorized to facilitate a resolution that is acceptable to all parties, and/or to accept a resolution that is proposed by the parties, usually through their Advisors, including terms of confidentiality, release, and non-disparagement.

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/disciplinary actions (e.g., referral for formal resolution, referral to the conduct process for failure to comply). The outcome of complaints resolved by Alternative Resolution are not appealable.

3. Respondent Accepts Responsibility for Alleged Violations

The Respondent may accept responsibility for all or part of the alleged policy violations at any point during the Resolution Process. If the Respondent indicates an intent to accept responsibility for all of the alleged misconduct, the formal 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 applicable, the Title IX Coordinator will determine whether all parties and Seattle University are able to agree on responsibility, restrictions and/or remedies. If so, the Title IX Coordinator implements the accepted finding that the Respondent is in violation of Seattle University policy and implements agreed-upon restrictions and remedies and determines the appropriate sanction(s) in coordination with other appropriate administrator(s), as necessary.

This result is not subject to appeal once all parties indicate their written assent to all agreed upon resolution terms. When the parties cannot agree on all terms of resolution, the Formal Grievance Process will resume at the same point where it was paused.

When a resolution is accomplished, the appropriate sanction(s) or responsive actions are promptly implemented to effectively stop the harassment or discrimination, prevent its recurrence, and remedy the effects of the discriminatory conduct, both on the Complainant and the community.

B. Formal Grievance Process

1. Notice of Investigation and Allegations

The Title IX Coordinator will provide written Notice of the Investigation and Allegations (the "NOIA") to the Respondent upon commencement of the Formal Grievance Process. The NOIA is also copied to the Complainant, who may be given advance notice of when the NOIA will be delivered to the Respondent.

The NOIA will include specific information as outlined in the 2020 Title IX Federal Regulations.

Amendments and updates to the NOIA may be made as the investigation progresses and more information becomes available regarding the addition or dismissal of various allegations.

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

2. Resolution Timeline

Seattle University will make a good faith effort to complete the Resolution Process within a sixty to ninety (60-90) business-day time period, which can be extended as necessary by the Title IX Coordinator, who will provide notice for any extensions or delays to the parties as appropriate, as well as an estimate of how much additional time will be needed to complete the process.

3. Appointment of Investigator

Once the decision to commence a formal grievance process is made, the Title IX Coordinator will appoint an Investigator to conduct the Investigation, usually within seven (7) business days of determining that an investigation should proceed.

4. Impartiality

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

The Title IX Coordinator will vet the assigned Investigator for impartiality by ensuring there are no actual or apparent conflicts of interest or disqualifying biases. At any time during the Resolution Process, the parties may raise a concern regarding bias or conflict of interest, and the Title IX Coordinator will determine in their sole discretion whether the concern is reasonable and supportable. If so, another individual will be assigned. If the source of the

conflict of interest or bias is the Title IX Coordinator, concerns should be raised with the Vice President for Diversity and Inclusion.

The Formal Grievance Process involves an objective evaluation of all relevant evidence obtained, including evidence that supports that the Respondent engaged in a Policy violation and evidence that supports that the Respondent did not engage in a policy violation. Credibility determinations may not be based solely on an individual's status or participation as a Complainant, Respondent, or witness.

Seattle University operates with the presumption that the Respondent is not responsible for the reported misconduct unless and until the Respondent is determined to be responsible for a Policy violation by the applicable standard of proof (discussed below).

5. Investigation Timeline

Investigations are completed expeditiously, normally within sixty (60) business days, though some investigations may take many weeks or even months, depending on the nature, extent, and complexity of the allegations, availability of witnesses, law enforcement involvement, etc. Seattle University will make a good faith effort to complete investigations as promptly as circumstances permit and will communicate regularly with the parties to update them on the progress and timing of the investigation.

6. Investigation Process Delays and Interactions with Law Enforcement

Seattle University may undertake a short delay in its investigation (several days to a few weeks) if circumstances require. Such circumstances include but are not limited to: a request from law enforcement to temporarily delay the investigation, the need for language assistance, the absence of parties and/or witnesses, and/or health conditions.

Seattle University will communicate the anticipated duration of the delay and reason to the parties in writing and provide the parties with status updates if necessary. Seattle University will promptly resume its Investigation and Resolution Process as soon as feasible. During such a delay Seattle University will implement supportive measures as deemed appropriate.

Seattle University action(s) or processes will not typically be altered or precluded on the grounds that civil or criminal charges involving the underlying incident(s) have been filed or that criminal charges have been dismissed or reduced.

7. Investigation Process Steps

All investigations are thorough, reliable, impartial, prompt, and fair. Investigations involve interviews with all available relevant parties and witnesses; obtaining available, relevant evidence; and identifying sources of expert information, as necessary.

All parties have a full and fair opportunity, through the investigation process, to suggest witnesses and questions, to provide evidence and expert witnesses, and to fully review and respond to all evidence on the record. Recordings, transcripts, or summaries of interviews will be provided to the parties.

At the discretion of the Title IX Coordinator, investigations can be combined when complaints implicate a pattern, collusion, and/or other shared or similar actions.

8. Witnesses' Role and Participation in the Investigation

Witnesses (as distinguished from the parties) who are employees of Seattle University are required to cooperate with and participate in Seattle University's investigation and Resolution Process. Student witnesses and witnesses from outside the Seattle University community are encouraged to cooperate with Seattle University investigations and to share what they know about a complaint.

9. Interview Recording

No person may audio or video record an investigation meeting or interview without approval of the Title IX Coordinator. If an Investigator elects to audio and/or video record interviews, all involved parties should be made aware of and consent to audio and/or video recording.

10. Evidentiary Considerations

Neither the investigation nor the hearing (discussed below) will consider: (1) incidents not relevant or not directly related to the possible violation(s), unless they evidence a pattern; or (2) questions and evidence about the Complainant's sexual predisposition; or (3) questions and evidence about the Complainant's prior sexual behavior, unless such questions and evidence about the Complainant's prior sexual behavior are offered to prove that someone other than the Respondent committed the conduct alleged by the Complainant, or to prove consent.

11. Referral for Hearing

Provided that the complaint is not resolved through Informal Resolution, once the final investigation report is shared with the parties, the Title IX Coordinator will refer the matter for a hearing.

The hearing may not be held less than ten (10) business days from the conclusion of the investigation–when the final investigation report is transmitted to the parties and the Decision-maker(s)–unless all parties and the Decision-maker(s) agree to an expedited timeline.

The Title IX Coordinator will select an appropriate Decision-maker from the Pool of Title IX Partners and provide a copy of the investigation report and the file of directly related evidence.

The Decision-maker will not have had any previous involvement with the complaint.

Those who have served as Investigators may be witnesses in the hearing and therefore may not serve as a Decision-maker in that matter. Those who are serving as Advisors for any party may not serve as Decision-makers in that matter.

The Title IX Coordinator may not serve as a Decision-maker in the matter but may serve as an administrative facilitator of the hearing if their previous role(s) in the matter do not create a conflict of interest. Otherwise, a designee may fulfill the facilitator role. The hearing will convene at a time and venue determined by the Title IX Coordinator or designee.

12. Additional Evidentiary Considerations in the Hearing

Previous disciplinary action of any kind involving the Respondent should not be used unless there is an allegation of a pattern of misconduct. Such information may also be considered in determining an appropriate sanction upon a determination of responsibility, as part of a progressive discipline system. This information is only considered at the sanction stage of the process and is not typically shared until then.

The parties may each submit a written impact and/or mitigation statement prior to the hearing for the consideration of the Decision-maker(s) at the sanction stage of the process when a determination of responsibility is reached.

13. Hearing Notice

No less than ten (10) business days prior to the hearing,5 the Title IX Coordinator will send notice of the hearing to the parties. Once mailed, emailed, and/or received in-person, notice will be presumptively delivered.

14. Hearings for violations that occur near or after the end of an academic term

Hearings for possible violations that occur near or after the end of an academic term (assuming the Respondent is still subject to this Policy) and are unable to be resolved prior to the end of term will typically be held immediately after the end of the term or during the summer, as needed, to meet the resolution timeline followed by Seattle University and remain within the 60 90 business-day goal for resolution. Employees who do not have 12-month contracts are still expected to participate in Resolution Proceedings that occur during months between contracts.

15. Pre-Hearing Preparation

After any necessary consultation with the parties, the Title IX Coordinator or Decision-maker will provide the names of persons who have been asked to participate in the hearing. All pertinent documentary evidence and the final investigation report will be provided to the parties at least ten (10) business days prior to the hearing.

Any witness scheduled to participate in the hearing must have been first interviewed by the Investigator or have proffered a written statement or answered written questions, unless all parties and the Decision Maker assent to the witness's participation in the hearing. The same holds for any relevant evidence that is first offered at the hearing. If the parties and Decision Maker do not assent to the admission of evidence newly offered at the hearing, the Decision Maker may delay the hearing and/or instruct that the investigation needs to be re-opened to consider that evidence.

The parties will be given the name of the Decision-maker at least five (5) business days in advance of the hearing. All objections to any Decision-maker must be raised in writing, detailing the rationale for the objection, and must be submitted to the Title IX Coordinator as soon as possible and no later than two (2) business days prior to the hearing. Decision-makers will only be removed if the Title IX Coordinator concludes that their bias or conflict of interest precludes an impartial hearing.

The Title IX Coordinator will give the Decision-maker a list of the names of all parties, witnesses, and Advisors at least five (5) business days in advance of the hearing. Any Decision-maker who cannot make an objective determination must recuse themselves from the proceedings when notified of the identity of the parties, witnesses, and Advisors in advance of the hearing. If a Decision-maker is unsure of whether a bias or conflict of interest exists, they must raise the concern to the Title IX Coordinator as soon as possible.

During the ten (10)-business-day period prior to the hearing, the parties have the opportunity for continued review and provide written comments on the final investigation report and available evidence, and the parties' comments may be shared with the Decision-maker in advance of the hearing or at the hearing and will be exchanged between each party by the Decision-maker or Title IX Coordinator.

16. Joint Hearings

In hearings involving more than one Respondent and/or involving more than one Complainant who has accused the same individual of substantially similar conduct, the default procedure will be to hear the allegations jointly.

However, the Title IX Coordinator may permit the investigation and/or hearings pertinent to each Respondent or complaint to be conducted separately, at their sole discretion. In joint hearings, separate determinations of responsibility will be made for each Respondent and/or for each complaint with respect to each alleged policy violation.

17. Hearing Procedures

At the hearing, the Decision-maker has the authority to hear and make determinations on all allegations of discrimination, harassment, and/or retaliation and may also hear and make determinations on any additional alleged policy violations that occurred in concert with the discrimination, harassment, and/or retaliation, even though those collateral allegations may not specifically fall within the Policy.

Participants at the hearing may include the Decision-maker, the hearing facilitator the Investigator who conducted the investigation, the parties, Advisors to the parties, any called witnesses, the Title IX Coordinator, legal counsel, and anyone providing authorized accommodations, interpretation, and/or assistive services.

The Decision-maker will answer all questions of procedure.

Anyone appearing at the hearing to provide information will respond to questions on their own behalf.

The Decision-maker will allow witnesses who have relevant information to appear at a portion of the hearing to respond to specific questions from the Decision-maker and the parties, and the witnesses will then be excused. The Investigator may remain present for the duration of the hearing.

The Decision-maker will explain the procedures and facilitates introductions. The Hearing Facilitator will attend to logistics for the hearing. The Investigator may present a summary of

the final investigation report and may be present during the entire hearing process, but not during deliberations.

Neither the Parties nor the Decision-maker should ask the Investigator their opinion on credibility, recommended findings, or determinations, and Advisors and Parties will refrain from discussion of or questions for Investigators about these assessments. If such information is introduced, the Decision-maker will direct that it be disregarded.

Complainants and Respondents will be permitted to provide an opening and closing statement during the hearing. The Decision-maker will first ask questions of the parties and witnesses, and then the Parties may ask questions of the parties and witnesses through their Advisors.

All questions are subject to a relevance determination by the Decision-maker. The Advisor will pose the proposed question orally, electronically, or in writing (orally is the default, but other means of submission may be permitted by the Decision-maker upon request if agreed to by all parties and the Decision-maker). The proceeding will pause to allow the Decision-maker to consider the question (and state it if it has not already been stated aloud), and the Decision-maker will determine whether the question will be permitted, disallowed, or rephrased.

The Decision-maker may invite explanations or persuasive statements regarding relevance with the Advisors if the Decision-maker so chooses. The Decision-maker will then state their decision on the question and advise the party/witness to whom the question was directed, accordingly. The Decision-maker will explain any decision to exclude a question as not relevant, or to reframe it for relevance.

The Decision-maker will limit or disallow questions on the basis that they are irrelevant, unduly repetitious (and thus irrelevant), or abusive. The Decision-maker has final say on all questions and determinations of relevance. The Decision-maker may consult with legal counsel on any questions of admissibility. The Decision-maker may ask Advisors to frame why a question is or is not relevant from their perspective but will not entertain argument from the Advisors on relevance once the Decision-maker has ruled on a question.

If the parties raise an issue of bias or conflict of interest of an Investigator or Decision-maker at the hearing, the Decision Maker may elect to address those issues, consult with legal counsel, and/or refer them to the Title IX Coordinator, and/or preserve them for appeal. If bias is not in issue at the hearing, the Decision-maker should not permit irrelevant questions that probe for bias.

18. Refusal to Submit to Questioning; Inferences

Any party or witness may choose not to offer evidence and/or answer questions at the hearing, either because they do not attend the hearing, or because they attend but refuse to participate in some or all questioning. The Decision-maker(s) can only rely on whatever relevant evidence is available through the investigation and hearing in making the ultimate determination of responsibility. The Decision-maker(s) may not draw any inference solely from a party's or

witness's absence from the hearing or refusal to submit to cross-examination or answer other questions.

19. Hearing Recordings

Hearings (but not deliberations) are recorded by Seattle University for purposes of review in the event of an appeal. The parties may not record the proceedings, and no other unauthorized recordings are permitted.

The Decision-maker, the parties, their Advisors, and appropriate administrators of Seattle University will be permitted to review the recording or review a transcript of the recording, upon request to the Title IX Coordinator. No person will be given or be allowed to make a copy of the recording without permission of the Title IX Coordinator.

20. Deliberation and Determination

After closing statements from the Parties, the Decision-maker will deliberate in closed session to determine whether the Respondent is responsible for the alleged Policy violation(s) based on the standard of proof. Deliberations are not recorded.

When there is a determination by the Decision-maker that the Respondent is responsible for one or more of the allegations, the Decision-maker may then consider any previously submitted impact and/or mitigation statement(s) provided by the Parties in determining appropriate Sanction(s). The Title IX Coordinator will ensure that any submitted statements are exchanged between the Parties if they are viewed by the Decision-maker. Impact or mitigation statements do not influence the determination of responsibility; they only potentially influence the Sanctions.

The Decision-maker will then prepare and provide the Title IX Coordinator with a written outcome letter detailing their determination, the rationale(s) explaining the decision(s), the Relevant and not impermissible evidence used in support of the determination(s), the evidence not relied upon in the determination(s), any credibility assessments, and any Sanction(s) and rationales explaining the Sanction(s).

This statement will typically be submitted to the Title IX Coordinator within ten (10) business days from the conclusion of the hearing, unless the Title IX Coordinator grants an extension. The Title IX Coordinator will notify the Parties of any extension.

21. Sanctions

a. Student and/or Student Club or Organization Sanctions

The following are common Sanctions that may be imposed upon Students individually or in combination. Student and Recognized Student Club or Organization Sanctions are outlined in Section 3.4 of the Code of Student Conduct, and include:

- Disciplinary Warning
- Disciplinary Probation
- Interim Suspension
- Deferred Suspension

- Suspension
- Dismissal
- Residence Hall Suspension or Dismissal
- Limitation or Loss of Privileges
- Parent/Guardian Notification
- Educational and/or Developmental Sanctions
- Withholding Honors and/or Degrees
- Revocation of Admission and/or Degrees
- Restitution, Fines, and/or Fees

b. Employee Sanctions/Responsive/Corrective Actions

Sanctions for an Employee who has been determined to be responsible for violating the Policy include:

- Verbal or Written Warning
- Performance Improvement Plan
- Enhanced Supervision, Observation, or Review
- Required Training or Education
- Denial of Pay Increase
- Loss of Oversight or Supervisory Responsibility
- Demotion
- Transfer
- Schedule adjustments
- Reassignment
- Delay of (or referral for delay of) Tenure Track Progress
- Assignment to New Supervisor
- Restriction of Stipends, Research, and/or Professional Development Resources
- Suspension/Administrative Leave with Pay
- Suspension/Administrative Leave without Pay
- Termination

22. Notice of Outcome

Unless the time period is extended by the Title IX Coordinator, in their sole discretion, the Title IX Coordinator will provide the Parties with a written outcome notification within ten (10) business days of the conclusion of the Resolution Process. The outcome notification will specify the determination of responsibility for each alleged Policy violation, any applicable Sanctions (provided that Seattle University is permitted to share the sanction under to state or federal law), and the rationale, written by the Decision-maker, supporting the determination (to the extent Seattle University is permitted by state or federal law to share the determination and rationale). The notification will also detail the Parties' equal rights to appeal, the grounds for appeal, the steps to take to request an appeal, and when the determination is considered final if neither Party appeals.

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

23. Withdrawal or Resignation Before Complaint Resolution

a. Students

Should a Respondent decide not to participate in the Resolution Process, the process will proceed to a reasonable resolution in their absence. Should a student Respondent permanently withdraw from Seattle University, the Resolution Process will typically end with a dismissal, as Seattle University will no longer have primary disciplinary jurisdiction over the withdrawn student. However, Seattle University may continue the Resolution Process when, at the discretion of the Title IX Coordinator, doing so may be necessary to address safety and/or remedy any ongoing effects of the alleged harassment, discrimination, and/or retaliation.

When a Respondent withdraws or leaves while the Resolution Process is pending, the Student may not return to Seattle University in any capacity until the Complaint is resolved and any Sanctions imposed are satisfied. If the Respondent indicates they will not return, the Title IX Coordinator has discretion to dismiss the Complaint. The Registrar and Office of Admissions will be notified, accordingly.

If the Student Respondent takes a leave of absence for a specified period of time (e.g., one quarter or semester), the Resolution Process may continue via remote means. If found responsible, that Student is not permitted to return to Seattle University unless and until all Sanctions, if any, have been satisfied.

b. Employees

Should an employee Respondent resign with unresolved allegations pending, the Resolution Process typically ends with dismissal, as Seattle University will no longer have primary disciplinary jurisdiction over the resigned employee. However, Seattle University may continue the Resolution Process when, at the discretion of the Title IX Coordinator, doing so may be necessary to address safety and/or remedy any ongoing effects of the alleged harassment, discrimination, and/or retaliation.

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

The employee who resigns with unresolved allegations pending is not eligible for academic admission or rehire with Seattle University until the Complaint is resolved and any Sanctions imposed are satisfied, and the records retained by the Title IX Coordinator will reflect that status.

All Seattle University responses to future inquiries regarding employment references for that individual may include that the former employee resigned during a pending disciplinary matter.

24. Appeals

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

An Appeals Decision-maker will be designated by the Title IX Coordinator. Appeal Decision-makers may not have been previously involved in the Resolution Process for the complaint, including in any dismissal appeal that may have been heard earlier in the process.

The Request for Appeal will be forwarded to the Appeals Decision-maker to make an initial determination of whether the request states one of the grounds for appeal (a Review for Standing). This review is not a review of the merits of the appeal, but solely a determination as to whether the request states a basis for appeal and is timely filed.

a. Grounds for Appeal

Appeals may be made exclusively upon the following grounds:

i) A procedural irregularity that affected the outcome of the matter;
ii) New evidence that was not reasonably available at the time of the determination regarding responsibility or dismissal was made, that could affect the outcome of the matter;
iii) The Title IX Coordinator, Investigator, or Decision-maker 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;
iv) The Sanctions are disproportionate to the outcome, considering the cumulative conduct/disciplinary record of the Respondent.

If any of the bases in the Request for Appeal do not meet the grounds herein, the request will be denied by the Appeal Decision-maker, and the parties and their Advisors will be notified in writing of the denial and the rationale.

If any of the bases stated in the Request for Appeal meet the grounds in this Policy, then the Appeal Decision Maker will notify all parties and their Advisors, the Title IX Coordinator, and, when appropriate, the Investigator and/or the original Decision-maker.

All other parties and their Advisors, the Title IX Coordinator, and, when appropriate, the Investigator and/or the original Decision-maker will be emailed a copy of the Request for Appeal with the approved grounds and then be given five (5) business days to submit a written response to the portion of the appeal that was approved and involves them. All responses, if any, will be forwarded by the Appeal Decision-maker to all parties for review and comment.

The non-appealing party (if any) may also choose to appeal upon receiving a copy of the Request for Appeal. If they choose to do so, they must also submit a Request for Appeal, which will subject to an initial review by the Appeal Decision Maker to determine whether it states one of the grounds for Appeal. If it does, it will be forwarded to the party who initially requested

an appeal, the Title IX Coordinator, and the Investigator(s) and/or original Decision-maker(s), as necessary, who will submit their responses, if any, within five (5) business days. Any such responses will be circulated for review and comment by all parties. If any or all of the non-appealing party's Request for Appeal is not approved, the parties will be notified accordingly, in writing.

Neither party may submit any new requests for appeal after the party who initially requested an appeal, the Title IX Coordinator, the Investigator(s) and/or original Decision-maker(s) submit their response to the non-appealing party's Request for Appeal. The Appeal Decision-maker will collect any additional information needed and all documentation regarding the approved grounds for appeal, and the subsequent responses and the Decision-maker will render a decision within ten (10) business days, unless extended by the Title IX Coordinator in their sole discretion. All decisions apply the preponderance of the evidence standard.

A Notice of Appeal Outcome will be sent to all parties within ten business days (unless extended by the Title IX Coordinator). The Notice of Appeal Outcome will specify the finding on each ground for appeal, any specific instructions for remand or reconsideration, any sanction(s) that may result (provided Seattle University is permitted to share the sanction(s) under to state or federal law), and the rationale supporting the determination (to the extent Seattle University is permitted to share the rationale under state or federal law).

Notification will be made in writing and may be delivered in person, mailed to the local or permanent address of the parties as indicated in official institutional records, or emailed to the parties' Seattle University-issued email or otherwise approved account. Once mailed, emailed and/or received in-person, notice will be presumptively delivered.

b. Sanctions Status During the Appeal

Sanctions imposed as a result of the determination are paused (i.e., not implemented) during the appeal process, and Supportive Measures may be maintained or reinstated until the appeal determination is made.

c. Appeal Considerations

- Appeals are not intended to provide a re-hearing of the allegation(s). In most cases, appeals are confined to a review of the written documentation or record of the original hearing and pertinent documentation regarding the specific grounds for appeal.
- Decisions on appeal are to be deferential to the original determination, making changes to the finding only when there is clear error and to the sanction(s)/responsive action(s) only if there is a compelling justification to do so.
- An appeal is not an opportunity for Appeal Decision-makers to substitute their judgment for that of the original Decision-maker(s) merely because they disagree with the finding and/or sanction(s).
- The Appeal Decision-maker may consult with the Title IX Coordinator and/or legal counsel on questions of procedure or rationale, for clarification, if needed. Documentation of all such consultation will be maintained.

- Appeals granted should normally be remanded (or partially remanded) to the original Investigator(s) and/or Decision-maker(s) for reconsideration.
- Once an appeal is decided, the outcome is final: further appeals are not permitted, even if a decision or sanction is changed on remand (except in the case of a new hearing).
- In rare cases where an error cannot be cured by the original Investigator and/or Decision maker or the Title IX Coordinator (as in cases of bias), the Appeal Decision-maker may order a new investigation and/or a new hearing with new Title IX Partners serving in the Investigator and Decision-maker roles.
- The results of a remand to a Decision-maker(s) cannot be appealed. The results of a new hearing can be appealed, once, on any of the three available appeal grounds.
- In cases that result in reinstatement to Seattle University or resumption of privileges, all reasonable attempts will be made to restore the Respondent to their prior status, recognizing that some opportunities lost may be irreparable in the short term.

25. Long-Term Remedies/Other Actions

Following the conclusion of the Resolution Process, and in addition to any Sanctions implemented or Informal Resolution terms, the Title IX Coordinator may implement additional long-term Remedies or actions with respect to the Parties and/or the Seattle University community that are intended to stop the Policy violation, remedy its effects, and prevent recurrence.

Seattle University will maintain the confidentiality of any long-term Remedies, actions, or measures, provided confidentiality does not impair Seattle University's ability to provide these services.

26. Failure to Comply with Sanctions and/or Responsive Actions

All Respondents are expected to comply with the assigned Sanctions, responsive actions, corrective actions, and/or Informal Resolution terms within the timeframe specified. Failure to abide by the Sanction(s) imposed by the date specified, whether by refusal, neglect, or any other reason, may result in additional Sanction(s), including suspension, dismissal, and/or termination from Seattle University. Supervisors are expected to enforce the completion of Sanctions actions for their Employees.

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

III. Process B

Except in cases concerning alleged sexual harassment involving only employees (which are resolved pursuant to the Human Resources Sexual Harassment Policy), Process B applies when the Title IX Coordinator determines Process A is inapplicable, or offenses subject to Process A have been dismissed. If Process A is applicable, Process A must be applied in lieu of Process B.

Seattle University will act on any formal or informal allegation or notice of violation of the Policy that is received by the Title IX Coordinator or a member of the administration, faculty, or other employee, with the exception of confidential resources, as articulated in the Policy above.

These procedures may also be used to address collateral misconduct arising from the investigation of or occurring in conjunction with harassing, discriminatory, or retaliatory conduct (e.g., vandalism, physical abuse of another). All other allegations of misconduct unrelated to incidents covered by this Policy will be addressed through the procedures elaborated in the respective Code of Student Conduct, Faculty Handbook, and Human Resources Policies.

A. Overview

Unless it is required to be resolved through Process A, Seattle University will act on any Notice, Complaint, or Knowledge of a potential violation of the Policy that is received by the Title IX Coordinator or any other Mandated Reporter by applying the Resolution Process described below. The terms used in this Process have the meanings described in the Policy unless otherwise noted.

The procedures below apply to all allegations of discrimination on the basis of Sex, including Harassment and Retaliation involving Students, staff, administrators, faculty members, or third parties. Unionized/other categorized Employees are subject to the terms of their agreements/Employees' rights to the extent those agreements do not conflict with federal or state compliance obligations. The Title IX Coordinator is responsible for coordinating the University's compliance with this Process.

B. Initial Evaluation

Upon receipt of Notice, a Complaint, or Knowledge of an alleged Policy violation, the Title IX Coordinator will initiate a prompt initial evaluation to determine Seattle University's next steps. This evaluation will typically occur within seven (7) business days of receiving the Notice, Complaint, or Knowledge of the alleged Policy violation. While the Title IX Coordinator is conducting the initial evaluation, or promptly thereafter, the Title IX Coordinator will contact the Complainant or the source of the Notice to offer Supportive Measures, provide information regarding resolution options, and determine how they wish to proceed.

The initial evaluation typically includes:

- Assessing whether the reported conduct could reasonably constitute a violation of the Policy.
    - If the conduct could not reasonably constitute a violation of the Policy, the matter will typically be dismissed from the Resolution Process, consistent with the dismissal provision below. If applicable, the conduct will be referred to the appropriate Seattle University office for resolution.
- Determining whether Seattle University has jurisdiction over the reported conduct, as defined by the Policy.

    - If the conduct is not within Seattle University's jurisdiction under this Policy, the matter will typically be dismissed from the Resolution Process, consistent with the dismissal provision below. If applicable, the conduct will be referred to the appropriate Seattle University office for resolution.
- Offering and coordinating Supportive Measures for the Complainant.
- Offering and coordinating Supportive Measures for the Respondent. ▪ Notifying the Complainant, or the person who reported the alleged violation(s), of the resolution process, including a supportive and remedial response, an Informal Resolution option, or the Resolution Process described below.
- Determining whether the Complainant wishes to make a Complaint.
- Notifying the Respondent of the resolution processes, including a supportive and remedial response, an Informal Resolution option, or the Resolution Process described below, if a Complaint is made.

C. Helping a Complainant to Understand Options

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

Working with the Complainant to determine whether the Complainant wishes to pursue one of three resolution options:

- a supportive and remedial response, and/or
- Informal Resolution, or
- the Resolution Process described below.

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

If the Complainant elects to proceed with the Resolution Process below, and the Title IX Coordinator has determined the Policy applies and that Seattle University has jurisdiction, they will coordinate the appropriate Resolution Process, will provide the Parties with a Notice of Investigation and Allegation(s) (NOIA), and will initiate an investigation consistent with these Procedures.

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

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

D. Title IX Coordinator Authority to Initiate Complaint

If the Complainant does not wish to proceed with the Resolution Process by submitting a Complaint, the Title IX Coordinator, who has ultimate discretion as to whether a Complaint is initiated, will offer Supportive Measures and determine whether to initiate a Complaint themself. To make this determination, the Title IX Coordinator will evaluate the Complainant's request to determine whether there is a serious and imminent threat to someone's safety or whether Seattle University cannot ensure equal access to its education program or activity without initiating a Complaint. The Title IX Coordinator will consider the following non-exhaustive factors to determine whether to file a Complaint:

- The Complainant's request not to proceed with initiation of a Complaint;
- The Complainant's reasonable safety concerns regarding initiation of a Complaint;
- The risk that additional acts of discrimination would occur if a Complaint is not initiated;
- The severity of the alleged discrimination, including whether the discrimination, if established, would require the removal of a Respondent from campus or imposition of another disciplinary Sanction to end the discrimination and prevent its recurrence;
- The age and relationship of the Parties, including whether the Respondent is a Seattle University Employee;
- The scope of the alleged discrimination, including information suggesting a pattern, ongoing discrimination, or discrimination alleged to have impacted multiple individuals;
- The availability of evidence to assist a Decision-maker in determining whether discrimination occurred;
- Whether Seattle University could end the alleged discrimination and prevent its recurrence without initiating its Resolution Process.

If deemed necessary, the Title IX Coordinator may consult with appropriate Seattle University Employees, and/or conduct a violence risk assessment to aid their determination whether to initiate a Complaint.

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

This Resolution Process, consisting of Informal Resolution or Hearing Resolution, is Seattle University's chosen approach to addressing all forms of discrimination on the basis of Sex, as defined by the Policy. The process considers the Parties' preferences but is ultimately determined at the Title IX Coordinator's discretion.

Resolution proceedings are Private. All individuals present at any time during the Resolution Process are expected to maintain the Privacy of the proceedings in accordance with Seattle University Policy.

E. Informal Resolution

Through the Title IX Coordinator, Seattle University may offer the Parties an opportunity to resolve the Complaint through an informal resolution process, unless the Complaint includes an allegation that an Employee engaged in Sex-Based Harassment of a Student.

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

Before initiation of an Informal Resolution process, Seattle University will provide the Parties with a Notice of Investigation and Allegations ("NOIA") that explains:

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

Seattle University offers four categories of Informal Resolution:

1. **Supportive Resolution**. When the Title IX Coordinator can resolve the matter informally by providing supportive measures designed to remedy the situation.
2. **Educational Conversation**. When the Title IX Coordinator can resolve the matter informally by having a conversation with the Respondent to discuss the Complainant's concerns and institutional expectations or can assist the Complainant in their desire to confront the conduct.
3. **Accepted Responsibility**. When the Respondent is willing to accept responsibility for violating Policy and is willing to agree to actions that will be enforced similarly to Sanctions, and the Complainant(s) and Seattle University are agreeable to the resolution terms.
4. **Alternative Resolution**. When the Parties agree to resolve the matter through an alternative resolution mechanism (which could include, but is not limited to, mediation, shuttle negotiation, restorative practices, facilitated dialogue, etc.), as described below.

The individual facilitating an Informal Resolution must be trained and cannot be the Investigator, Decision-maker, or Appeal Decision-maker.

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

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

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

If an Informal Resolution option is not available or selected, Seattle University will initiate or continue an investigation and subsequent Resolution Process to determine whether the Policy has been violated.

F. Hearing Resolution Process

1. Notice of Investigation and Allegations

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

2. Resolution Timeline

Seattle University will make a good faith effort to complete the Resolution Process as promptly as circumstances permit and will communicate regularly with the Parties to update them on the progress and timing of the process.

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

Seattle University may undertake a short delay in its investigation (several days to a few weeks) if circumstances require. Such circumstances include but are not limited to a request from law enforcement to delay the investigation temporarily, the need for language assistance, the absence of Parties and/or witnesses, and/or health conditions. Seattle University will promptly resume its Resolution Process as soon as feasible. During such a delay, Seattle University will implement and maintain supportive measures for the Parties as deemed appropriate. Seattle University will additionally provide for reasonable extension of timeframes on a case-by-case basis for good cause with written notice to the parties that includes the reason for the delay.

Seattle University action(s) or processes are not typically altered or precluded on the grounds that civil or criminal charges involving the underlying incident(s) have been filed or that criminal charges have been dismissed or reduced.

3. Impartiality

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

The Title IX Coordinator will vet the assigned Investigator, Decision-maker, and Appeals Decision maker for impartiality by ensuring there are no actual or apparent conflicts of interest or disqualifying biases. At any time during the Resolution Process, the Parties may raise a concern regarding bias or conflict of interest, and the Title IX Coordinator will determine whether the concern is reasonable and supportable. If so, another trained individual will be assigned, and the impact of the bias or conflict, if any, will be remedied. If the source of the conflict of interest or bias is the Title IX Coordinator, such concerns should be raised with the Vice President for Diversity and Inclusion.

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

4. Investigator Appointment

Once an investigation is initiated, the Title IX Coordinator appoints an Investigator to conduct it. These Investigators may be any properly trained Investigator, whether internal or external to Seattle University's community.

5. Witness Role and Participation in the Investigation

Employees (not including Complainant and Respondent) are required to cooperate with and participate in Seattle University's investigation and Resolution Process. Student witnesses and witnesses from outside the Seattle University community cannot be required to participate but are encouraged to cooperate with Seattle University investigations and to share what they know about a Complaint.

Interviews may be conducted in person, via online videoconferencing platforms, or, in limited circumstances, by telephone. Seattle University will take appropriate steps to ensure the security/privacy of remote interviews.

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

6. Interview Recording

In some instances, Investigators may record interviews pertaining to the Resolution Process (other than Informal Resolution meetings). If so, the Parties may review copies of their own interviews, upon request. Witnesses may additionally be permitted to review recordings of their own interviews. No unauthorized audio or video recording of any kind is permitted during investigation meetings. If an Investigator elects to audio and/or video record interviews, all involved individuals should be made aware of audio and/or video recording.

7. Evidentiary Considerations

The Investigator and the Decision-maker will only consider evidence that is deemed Relevant and not otherwise impermissible. Relevant evidence is that which may aid in determining whether the allegation occurred, or whether the behavior constitutes a violation of Policy.

Impermissible evidence includes evidence that is not Relevant, such as evidence that relates to the Complainant's sexual interests or prior sexual conduct, unless 1) evidence about the Complainant's prior sexual conduct is offered to prove that someone other than the Respondent committed the alleged conduct, or 2) is evidence about specific incidents of the Complainant's prior sexual conduct with the Respondent that is offered to prove Consent.

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

8. Investigation

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

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

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

9. Live Hearings

The following provisions apply to a live hearing:

- **Hearing Venue Options and Recordings.** The live hearing may occur in person or via video technology. The Decision-maker and Parties must be able to simultaneously see

and hear a party or witness while that person is speaking. Both options are considered fair and equitable. Alternative arrangements may also be made at the Title IX Coordinator's discretion.

  - The Parties may make a request to the Title IX Coordinator that the hearing occur in person or via video technology, but they must do so at least three (3) business days prior to the hearing. The Title IX Coordinator retains discretion to determine whether the hearing will occur in person or via video technology.
  - All hearings will be recorded, and Parties may request a copy of the recording from the Title IX Coordinator following the live hearing.
  - No unauthorized recordings are permitted.

- **Hearing Participants**. Persons who may be present for a hearing include the Decision-maker; hearing facilitator; Investigator; the Parties and their Advisors; anyone providing authorized accommodations, interpretation, and/or assistive services; University Counsel; and anyone else deemed necessary by the Decision maker. Witnesses are present only during their portion of the testimony.
- **Personal Devices**. Parties and Advisors are permitted to have their phones and a laptop or tablet, but these should only be used during the hearing in a matter consistent with Policy.
- **Questioning**. All questions during the hearing will be asked by the Decision-maker. Parties and Advisors may suggest questions to be posed by the Decision-maker during the pre-hearing meetings or by submission of written questions during the hearing. The method of submitting questions to the Decision-maker will be specified by the Decision-maker during the pre-hearing meetings.
  - **Impact/Mitigation Statements**. Each party may submit an impact and/or mitigation statement to the Title IX Coordinator that the Decision-maker will review during any Sanction determination, if applicable. The Title IX Coordinator will only provide the impact statements to the Decision-maker if the Decision-maker determines that the Policy has been violated. If the Title IX Coordinator shares the impact statements with the Decision-maker, they will also be shared with the Parties.
- **Disability Accommodations and Other Assistance**. Parties should contact the Title IX Coordinator at least five (5) business days prior to the hearing to arrange for any reasonable disability accommodations, language assistance, and/or interpretation services that may be needed at the hearing, if possible.
- **Decision-maker Conflicts of Interest or Bias.** The Decision-maker must not have a bias for or against Complainants or Respondents generally or the individual Complainant or Respondent in particular. The Decision-maker must recuse themself if such bias or conflict of interest exists.
  - If the Decision-maker believes there is possible conflict of interest or bias, they will consult with the Title IX Coordinator about possible recusal or removal.
  - Additionally, the Parties may raise challenges that the Decision-maker is biased or has a conflict of interest. The Parties must raise challenges with the Title IX

Coordinator within two (2) business days of receiving the hearing notice. Challenges must include a rationale.
    - The Title IX Coordinator will only remove and replace a Decision-maker in situations of demonstrated bias or conflicts of interest. Perceptions of bias or conflict or the potential for bias or conflict are not sufficient cause for removal.
    - If a Decision-maker recuses themself as the result of a conflict of interest or bias, or is removed, the Title IX Coordinator will promptly appoint a new Decision-maker who does not have a conflict of interest or bias and notify the Parties accordingly.
- **Evidence Provided to Decision-maker and Parties.**
    - The Decision-maker will be provided electronic copies of the Final Investigation Report and all Relevant but not impermissible evidence, including the names of all Parties, witnesses, and Advisors, at least seven (7) business days in advance of the hearing.
    - The Parties will be provided with electronic copies of all the materials provided to the Decision-maker as part of the hearing notice, unless those materials have already been provided.

10. Hearing Notice

The Title IX Coordinator will send the Parties a Notice of Hearing with sufficient time for the Parties to prepare for the hearing, typically at least seven (7) business days prior to the hearing. Once sent, notice will be presumptively delivered. The hearing notice includes:

- A description of the alleged violation(s), a list of all policies allegedly violated, a description of the applicable hearing procedures, and a statement of the potential Sanctions/responsive actions that could result.
- The time, date, and location of the hearing.
- A description of any technology that will be used to facilitate the hearing.
- Relevant information regarding hearing logistics, pre-hearing meetings, the Final Investigation Report, the Parties and witnesses participating in the hearing, the identity of the Decision-maker, details related to questioning, the role of Advisors, impact/mitigation statements, and how to request disability accommodations or other assistance.

11. Witness Participation

Student witnesses are encouraged to participate in, and make themselves reasonably available for, the hearing. Employee witnesses are expected to participate in, and make themselves reasonably available for, the hearing. Witnesses may participate in-person or via video technology that allows the Decision-maker and the Parties to see and hear the witness while that person is speaking. Witnesses are not permitted to be accompanied by an Advisor or other support person without express permission of the Title IX Coordinator. At the discretion of the Decision-maker, a witness may join by phone if no other reasonable alternative is available.

If any Party or witness does not appear at the scheduled hearing, the hearing may be held in their absence. For compelling reasons, the Title IX Coordinator may reschedule the hearing.

Hearings for possible violations that occur near or after the end of an academic term (assuming the Respondent is still subject to this Policy) and are unable to be resolved prior to the end of term will typically be held immediately after the end of the term, including during the summer, as needed, to ensure a prompt resolution. Employees, including Parties and witnesses, who do not have 12-month contracts are still expected to participate in Resolution Processes that occur during months between contracts.

The Title IX Coordinator will notify all witnesses of their requested participation in the hearing at least five (5) business days prior to the hearing. Witnesses will be present for the hearing only during their testimony.

Any witness scheduled to participate in the hearing must have been first interviewed by the Investigator, unless:

- All Parties and the Decision-maker assent to the witness's participation in the hearing without a prior interview by the Investigator; and
- The Decision-maker deems the evidence presented by the new witness to be Relevant, not impermissible, and not information already established in the record; and
- The witness's late involvement was not the result of bad faith by the witness, the Parties, or others.

If the above criteria are not met, but the witness's evidence is deemed Relevant, not impermissible, and not duplicative, the Decision-maker may, at their discretion, engage in any of the following actions:

- Delay the hearing;
- Provide the Parties at least five (5) business days to review the Relevant portions of the new witness's statements, if such statements are submitted;
- Remand the Complaint back to the Investigator for further investigation or verification; or
- Allow the Parties to review and comment on the testimony of the new witness.

If the evidence is deemed not Relevant or impermissible, the Decision-maker may proceed with the hearing absent the new witness's participation.

12. Hearing Procedures

a. Evidentiary Considerations

The Parties must provide all evidence they wish to be considered by the Decision-maker to the Investigator prior to the Investigator completing the Final Investigation Report. Evidence offered after that time will be evaluated by the Decision-maker for relevance. If deemed Relevant and not impermissible, it will be admitted. If the evidence is deemed not Relevant or impermissible, the Decision-maker may proceed with the hearing absent the new evidence.

The new Relevant evidence will be admitted if:

- All Parties and the Decision-maker assent to the new evidence being considered by the Decision-maker without remanding the Complaint back to the Investigator; and
- The evidence is not duplicative of evidence already in the record; and
- It is not impermissible; and
- The new evidence was either not reasonably available prior to the conclusion of the Final Investigation Report, or the failure to provide it in a timely manner was not the result of bad faith by the Parties, witnesses, or others.

If the above criteria are not met, but the evidence is deemed materially Relevant and not duplicative, the Decision-maker may, at their discretion, engage in any of the following actions:

- Delay the hearing;
- Provide the Parties with at least five (5) business days to review the Relevant evidence;
- Remand the Complaint back to the Investigator for further investigation or analysis; or
- Allow the Parties to review and comment on the new evidence.

If the evidence is deemed not Relevant or impermissible, the Decision-maker may proceed with the hearing without allowing the new evidence.

13. Collateral Misconduct

The Decision-maker has the authority to hear and make determinations on all allegations of Sex Based Discrimination, Harassment, Retaliation, and Other Prohibited Behavior under the Policy and may also hear and make determinations on any additional alleged collateral misconduct that occurred contemporaneously with the Sex-Based Discrimination, Harassment, Retaliation, or Other Prohibited Behavior, even though those collateral allegations may not specifically fall within one of the defined violations of the Policy.

14. Joint Hearing

In Complaints involving more than one Respondent and/or involving more than one Complainant accusing the same person of substantially similar conduct, the default procedure will be to hear the allegations jointly.

However, the Title IX Coordinator may permit the investigation and/or hearings pertinent to each Respondent or Complaint to be conducted separately if there is a compelling reason to do so. In joint hearings, separate determinations of responsibility will be made for each Respondent and/or for each Complaint with respect to each alleged Policy violation.

15. Investigator Presentation of Final Investigation Report

The Investigator may present a summary of the Final Investigation Report, including a review of the facts that are contested and those that are not. The Investigator may be questioned first by the Decision-maker and then by the Parties. The Investigator may attend the duration of the hearing or be excused after their testimony at the Decision-maker's discretion.

16. Testimony and Questioning

The Parties and witnesses may provide Relevant information in turn, beginning with the Complainant's opening statement, then the Respondent's, and then questioning in the order

determined by the Decision-maker. The Decision-maker will facilitate questioning of the Parties and witnesses first by the Decision-maker and then by the Parties through the Decision-maker. Questions that the Parties wish to have posed can be questions for that Party themself, another Party, or witnesses.

The Decision-maker will explain any decision to exclude a question as not Relevant, or to reframe it for relevance or clarity. The Decision-maker will limit or disallow questions they deem not appropriate on the basis that they are irrelevant, unduly repetitious (and thus irrelevant), seek or pertain to impermissible evidence, or are abusive. The Decision-maker has final say on all questions and determinations of relevance and appropriateness. The Decision-maker may consult with legal counsel on any questions of admissibility.

The Decision-maker will then pose the questions deemed Relevant, not impermissible, and appropriate to the party and/or witness.

If the Parties raise an issue of bias or conflict of interest of an Investigator or Decision-maker at the hearing, the Decision-maker may elect to address those issues, consult with legal counsel, refer them to the Title IX Coordinator, and/or preserve them for appeal. If bias is not an issue at the hearing, the Decision-maker should not permit irrelevant questions that probe for Investigator bias.

The Decision-maker will allow witnesses who have Relevant and not impermissible information to appear at a portion of the hearing to respond to specific questions from the Decision-maker and the Parties, and the witnesses will then be excused.

17. Refusal to Submit to Questioning and Inferences

Any Party or Student witness may choose to not offer evidence and/or answer questions at the hearing, either because they do not attend the hearing, or because they attend but refuse to participate in some or all questioning. Employee witnesses are required to participate in the hearing if they are reasonably available. The Decision-maker can only rely on the available Relevant and not impermissible evidence in making the ultimate determination of responsibility. The Decision-maker may not draw any inference solely from a party's or witness's absence from the hearing or refusal to answer any or all questions.

An Advisor may not be called as a witness at a hearing to testify to what their advisee has told them during their role as an Advisor unless the party being advised consents to that information being shared.

18. Hearing Recordings

Seattle University records hearings (but not deliberations) for purposes of review in the event of an appeal. No unauthorized audio or video recording of any kind is permitted during the hearing.

The Decision-maker, the Parties, their Advisors, Appeal Decision-makers, and other appropriate Seattle University officials will be permitted to review the recording or review a transcript of the recording upon request to the Title IX Coordinator. No unauthorized

disclosure, including sharing, copying, or distribution of the recording or transcript, is permitted.

19. Deliberations and Determination

After closing statements from the Parties, the Decision-maker will deliberate in closed session to determine whether the Respondent is responsible for the alleged Policy violation(s) based on the standard of proof. Deliberations are not recorded.

When there is a Finding of responsibility for one or more of the allegations, the Decision-maker may then consider any previously submitted impact and/or mitigation statement(s) provided by the Parties in determining appropriate Sanction(s). The Title IX Coordinator will ensure that any submitted statements are exchanged between the Parties if they are viewed by the Decision maker. Impact or mitigation statements do not influence the Finding; they only potentially influence the Sanctions.

The Decision-maker will then prepare and provide the Title IX Coordinator with a written outcome letter detailing all Findings and Final Determinations, the rationale(s) explaining the decision(s), the Relevant and not impermissible evidence used in support of the determination(s), the evidence not relied upon in the determination(s), any credibility assessments, and any Sanction(s) and rationales explaining the Sanction(s).

This statement will typically be submitted to the Title IX Coordinator within ten (10) business days from the conclusion of the hearing, unless the Title IX Coordinator grants an extension. The Title IX Coordinator will notify the Parties of any extension.

20. Sanctions

For the purposes of Sanctioning, the Decision-maker will consult with the Provost (for Student and Faculty Respondents) or the unit leader and Human Resources (for staff Respondents) to assure that the appropriate Sanction is imposed. Factors considered by the Decision-maker when determining Sanctions and responsive actions may include, but are not limited to:

- The nature, severity of, and circumstances surrounding the violation(s);
- The Respondent's disciplinary history;
- The need for Sanctions/responsive actions to bring an end to the Sex-Based Discrimination, Harassment, and/or Retaliation;
- The need for Sanctions/responsive actions to prevent the future recurrence of Sex Based Discrimination, Harassment, and/or Retaliation;
- The need to remedy the effects of the Sex-Based Discrimination, Harassment, and/or Retaliation on the Complainant and the community;
- The impact on the Parties; and
- Any other information deemed Relevant by the Decision-maker.

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

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

a. Student and/or Student Club or Organizations Sanctions

The following are common Sanctions that may be imposed upon Students singly or in combination. Student and Recognized Student Club or Organization Sanctions are outlined in Section 3.4 of the Code of Student Conduct, and include:

- Disciplinary Warning
- Disciplinary Probation
- Interim Suspension
- Deferred Suspension
- Suspension
- Dismissal
- Residence Hall Suspension or Dismissal
- Limitation or Loss of Privileges
- Parent/Guardian Notification
- Educational and/or Developmental Sanctions
- Withholding Honors and/or Degrees
- Revocation of Admission and/or Degrees
- Restitution, Fines, and/or Fees

b. Employee Sanctions/Responsive/Corrective Actions

Responsive actions for an Employee who has engaged in Sex-Based Discrimination, Harassment, and/or Retaliation include:

- Verbal or Written Warning
- Performance Improvement Plan
- Enhanced Supervision, Observation, or Review
- Required Training or Education
- Denial of Pay Increase
- Loss of Oversight or Supervisory Responsibility
- Demotion
- Transfer
- Schedule adjustments
- Reassignment
- Delay of (or referral for delay of) Tenure Track Progress
- Assignment to New Supervisor
- Restriction of Stipends, Research, and/or Professional Development Resources
- Suspension/Administrative Leave with Pay
- Suspension/Administrative Leave without Pay
- Termination

21. Notice of Outcome

Within ten (10) business days of the conclusion of the Resolution Process, the Title IX Coordinator will provide the Parties with a written outcome notification. The outcome notification will specify the Finding for each alleged Policy violation, any applicable Sanctions that the Seattle University is permitted to share pursuant to state or federal law, and a detailed rationale, written by the Decision-maker, supporting the Findings to the extent Seattle University is permitted by state or federal law to share them.

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

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

22. Withdrawal or Resignation Before Compliant Resolution

a. Students

Should a Student Respondent decide not to participate in the Resolution Process, the process proceeds absent their participation to a reasonable resolution. If a Student Respondent withdraws from Seattle University, the Resolution Process may continue, or Title IX Coordinator may exercise their discretion to dismiss the Complaint. If the Complaint is dismissed, Seattle University will still provide reasonable supportive or remedial measures as deemed necessary to address safety and/or remedy any ongoing effects of the alleged Sex-Based Discrimination, Harassment, and/or Retaliation.

Regardless of whether the Complaint is dismissed or pursued to completion of the Resolution Process, Seattle University will continue to address and remedy any systemic issues or concerns that may have contributed to the alleged violation(s), and any ongoing effects of the alleged Sex Based Discrimination, Harassment, and/or Retaliation.

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

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

b. Employees

Should an Employee Respondent decide not to participate in the Resolution Process, the process proceeds absent their participation to a reasonable resolution. If an Employee Respondent resigns or otherwise departs from Seattle University with unresolved allegations pending, the Resolution Process may continue, or Title IX Coordinator may exercise their discretion to dismiss the Complaint. If the Complaint is dismissed, Seattle University may still provide reasonable Supportive or remedial Measures as deemed necessary to address safety and/or remedy any ongoing effects of the alleged Sex-Based Discrimination, Harassment, and/or Retaliation.

When an Employee resigns and the Complaint is dismissed, the Employee may not return to Seattle University in any capacity. Human resources, the Registrar, and Admissions will be notified, accordingly, and a note will be placed in the Employee's file that they resigned with allegations pending and are not eligible for academic Admission or rehire with Seattle University. The records retained by the Title IX Coordinator will reflect that status.

23. Appeal of the Determination

The Title IX Coordinator will designate a single trained internal or external Appeal Decision-maker to hear the appeal. No Appeal Decision-maker will have been previously involved in the Resolution Process for the Complaint, including in any Supportive Measure or dismissal appeal that may have been heard earlier in the process.

a. Appeal Grounds

Appeals are limited to the following grounds:

1. A procedural irregularity affected the outcome of the matter.
2. New evidence that was not reasonably available at the time of the determination regarding responsibility or dismissal was made, that could affect the outcome of the matter.
3. The Title IX Coordinator, Investigator, or Decision Maker 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.
4. The Sanctions are disproportionate to the outcome, considering the cumulative conduct/disciplinary record of the Respondent.

b. Appeals

Any Party may submit a written request for appeal to the Title IX Coordinator within five (5) business days of the delivery of the Notice of Outcome.

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

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

If any of the grounds in the appeal meet the grounds in this Policy, then the appeal Decision maker will notify all Parties and their Advisors, the Title IX Coordinator, and, when appropriate, the Investigator and/or the original Decision-maker.

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

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

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

c. Appeal Determination Process

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

Appeal decisions are to be deferential to the original determination, making changes to the Finding only when there is clear error and to the Sanction(s)/responsive action(s) only if there is a compelling justification to do so. All decisions are made by majority vote and apply the preponderance of the evidence standard.

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

The appeal Decision-maker may consult with the 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.

d. Appeal Outcome

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

A notice of appeal Outcome letter will be sent to all Parties simultaneously, or without significant time delay between notifications. The appeal outcome will specify the Finding on each ground for appeal, any specific instructions for remand or reconsideration, any Sanction(s) that may result which Seattle University is permitted to share according to federal or state law, and the rationale supporting the essential Findings to the extent Seattle University is permitted to share under federal or state law.

Written notification may be delivered by one or more of the following methods: in person, mailed to the local or permanent address of the Parties as indicated in official institutional records, or emailed to the Parties' Seattle University-issued email or otherwise approved account. Once mailed, emailed, and/or received in person, the appeal outcome will be presumptively delivered.

Once an appeal is decided, the outcome is final and constitutes the Final Determination; further appeals are not permitted, even if a decision or Sanction is changed on remand (except in the case of a new determination). When appeals result in no change to the Finding or Sanction, that decision is final. When an appeal results in a new Finding or Sanction, that Finding or Sanction can be appealed one final time on the grounds listed above and in accordance with these procedures.

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

e. Sanction Status During the Appeal

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

If any of the Sanctions are to be implemented immediately post-determination, but pre-appeal, then the emergency removal procedures (detailed above) for a "show cause" meeting on the justification for doing so must be permitted within two (2) business days of implementation.

24. Long-Term Remedies/Other Actions

Following the conclusion of the Resolution Process, and in addition to any Sanctions implemented or Informal Resolution terms, the Title IX Coordinator may implement additional long-term Remedies or actions with respect to the Parties and/or the Seattle University

community that are intended to stop the Sex-Based Discrimination, Harassment, and/or Retaliation, remedy the effects, and prevent recurrence.

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

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

At the discretion of the Title IX Coordinator, certain long-term Supportive Measures may also be provided to the Parties even if no Policy violation is found.

When no Policy violation is found, the Title IX Coordinator will address any Remedies Seattle University owes the Respondent to ensure no effective denial of educational access.

Seattle University will maintain the confidentiality of any long-term Remedies/actions/measures, provided confidentiality does not impair Seattle University's ability to provide these services.

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

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

Failure to abide by the Sanction(s)/action(s) imposed by the date specified, whether by refusal, neglect, or any other reason, may result in additional Sanction(s)/action(s), including suspension, dismissal, and/or termination from Seattle University. Supervisors are expected to enforce the completion of Sanctions/responsive actions for their Employees.

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

26. Recordkeeping

For a period of at least seven (7) years following the conclusion of the Resolution Process, Seattle University will maintain records of:

a. Each Sex-Based Discrimination, Harassment, and Retaliation Resolution Process, including any Final Determination regarding responsibility or appeal, and any audio or audiovisual recording or transcript required under federal regulation
b. Any disciplinary Sanctions imposed on the Respondent
c. Any Supportive Measures provided to the Parties and any Remedies provided to the Complainant or the community designed to restore or preserve equal access to the Seattle University's education program or activity
d. Any appeal and the result therefrom
e. Any Informal Resolution and the result therefrom
f. All materials used to provide training to the Title IX Coordinator, Title IX Coordinator and designees, Investigators, Decision-makers, Appeal Decision makers, Informal Resolution Facilitator, and any person who is responsible for implementing Seattle University's Resolution Process, or who has the authority to modify or terminate Supportive Measures. Seattle University will make these training materials available for review upon request.
g. All materials used to train all Employees consistent with the requirements in the Title IX Regulations.

Seattle University will also maintain any and all records in accordance with state and federal laws.

IV. ACCOMMODATIONS AND SUPPORT DURING THE RESOLUTION PROCESS

A. Disability Accommodations

Seattle University is committed to providing reasonable accommodations and support to qualified Students, Employees, or others with disabilities to ensure equal access to the Seattle University's Resolution Process.

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

B. Other Support

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

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

V. REVISION OF THESE PROCEDURES

These procedures succeed any previous procedures addressing Sex-Based Discrimination, Harassment, and/or Retaliation for incidents reported after November 14, 2024. The Title IX

Coordinator will regularly review and update these procedures. Seattle University reserves the right to make changes to this document as necessary, and once those changes are posted online, they are in effect.

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

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

These procedures are effective November 12, 2024.

VI. TITLE IX PARTNERS

The Resolution Process relies on a pool of Title IX Partners to carry out the process. Title IX Partners may be Employees of Seattle University or may be externally sourced.

A. Title IX Partner Roles

Title IX Partners are trained annually, and can serve in the following roles, at the discretion of the Title IX Coordinator:

- Appropriate intake of an initial guidance pertaining to Complainants
- Advisor to the Parties
- Informal Resolution Facilitator
- Perform or assist with initial evaluation
- Investigator
- Hearing Facilitator
- Decision-maker for challenges to emergency removal and Supportive Measures
- Decision-maker
- Appeal of Dismissal Decision-Maker
- Appeal Decision-maker

B. Title IX Partner Appointment

The Title IX Coordinator, in consultation with senior administrators as necessary, appoints the Title IX Partners, which act with independence and impartiality. Although Title IX Partners are typically trained in a variety of skills sets and can rotate amongst the different roles listed above in different Complaints, Seattle University can also designate permanent roles for individual Title IX Partners.

C. Training

Title IX Partners receive annual training related to their respective roles. This training may include, but is not limited to:

- The scope Seattle University's Policy Prohibiting Sexual Harassment, Discrimination, and Retaliation

- Seattle University's Resolution Process
- How to conduct investigations and hearings that protect the safety of Complainants and Respondents, and promote accountability
- Implicit bias and confirmation bias
- Treating Parties equitably
- Disparate Treatment
- Disparate Impact
- Reporting, confidentiality, and Privacy requirements
- Applicable laws, regulations, and federal regulatory guidance
- How to implement appropriate and situation-specific Remedies
- How to investigate in a thorough, reliable, timely, and impartial manner
- Trauma-informed practices pertaining to investigations and resolution processes
- How to uphold fairness, equity, and due process
- How to weigh evidence
- How to conduct questioning
- How to assess credibility
- Impartiality and objectivity
- How to render Findings and generate clear, concise, evidence-based rationales
- The definitions of all prohibited conduct
- How to conduct an investigation and grievance process, including administrative resolutions, hearings, appeals, and Informal Resolution Processes
- How to serve impartially by avoiding prejudgment of the facts at issue, conflicts of interest, and bias against Respondents and/or for Complainants, and on the basis of Sex, race, religion, and other protected characteristics
- Any technology to be used at a live hearing
- Issues of relevance of questions and evidence
- Issues of relevance and creating an investigation report that fairly summarizes Relevant and not impermissible evidence
- How to determine appropriate Sanctions in reference to all forms of Sex-Based Discrimination, Harassment, and/or Retaliation allegations
- Recordkeeping

D. Additional Training Elements Specific to Title IX

All investigators, Decision-makers, and other persons who are responsible for implementing Seattle University's Title IX policies and procedures will receive training related to their duties under Title IX promptly upon hiring or change of position that alters their duties under Title IX or this part, and annually thereafter. Materials will not rely on sex stereotypes. Training topics include, but are not limited to:

- How to conduct a Sex discrimination resolution process consistent with the Resolution Process for the Policy Prohibiting Sexual Harassment, Discrimination, and Retaliation,

including issues of Disparate Treatment, Disparate Impact, Sexual Harassment, Quid Pro Quo, Hostile Environment Harassment, and Retaliation
- The meaning and application of the term "Relevant" in relation to questions and evidence, and the types of evidence that are impermissible regardless of relevance under the Title IX Regulations
- Training for Informal Resolution facilitators on the rules and practices associated with Seattle University's Informal Resolution process
- The role of the Title IX Coordinator
- Supportive Measures
- Clery Act/VAWA requirements applicable to Title IX
- Seattle University's obligations under Title IX
- How to apply definitions used by Seattle University with respect to Consent (or the absence or negation of Consent) consistently, impartially, and in accordance with Policy
- Reasonable modifications and specific actions to prevent discrimination and ensure equal access for pregnancy or related conditions
- Any other training deemed necessary to comply with Title IX

9 ALCOHOL AND OTHER DRUG USE PREVENTION PROGRAM

Seattle University's Alcohol and Other Drug Use Policies and Prevention Program ("AODPP") reflect the University's commitment to the health, safety, and well-being of each member of the Seattle University Community. In order to further student learning and development, and to promote the University's academic mission, Seattle University fosters an environment of personal and collective responsibility. This means that all members of the University—students, faculty, and staff—have a role in ensuring the wellbeing of our community, particularly as it pertains to the misuse of alcohol and other drugs.

As a Jesuit university, Seattle University is committed to Cura Personalis, or the care for the whole person. This extends to our AODPP. Seattle University recognizes that community members have a choice regarding their personal use of alcohol and other drugs and seeks to provide education that will help community members make informed, evidence-based choices. To this end, Seattle University provides a comprehensive, evidence-based risk reduction education through its programs and services and support to community members interested in or currently engaging in use reduction and/or recovery.

The purpose of this section is to make all members of the Seattle University community aware of the:

- Resources available to students, faculty, and staff who are concerned about their own alcohol or drug use, or that of a friend, family member, or colleague;

- Health risks associated with the use of illegal drugs and alcohol abuse;
- Policies governing the use of alcohol or illegal drugs in the campus community;
- Disciplinary sanctions for failing to adhere to University policies regarding drug or alcohol use; and
- Local, state, and federal laws governing alcohol and drug use.

Consistent with the law, the University conducts biennial reviews of its AODPP to determine the effectiveness of the program and areas for improvement.

The information included in this section will help in making informed decisions about the use of alcohol and other drugs. Careful attention to this information will help students, faculty, and staff promote the University's compliance with the Drug-Free Workplace Act of 1988 and the Drug-Free Schools and Communities Act of 1989.

I. Policies on Drug or Alcohol Use by the Campus Community

A. Policy on Drug or Alcohol Use by Students

The misuse of alcohol and other drugs undermines the University's ability to achieve its central mission—the academic and social development of its students. Seattle University therefore prohibits the illegal and irresponsible use of alcohol and other drugs by students.

Students at Seattle University have the responsibility to conduct themselves in a lawful and appropriate manner consistent with the mission of the University. Each student has the responsibility to know the risks associated with the use and misuse of alcohol and other drugs and to assist the University in creating an environment that promotes health-enhancing attitudes and activities.

i. Alcohol

a) It is illegal in the State of Washington for anyone under the age of 21 to possess, purchase, distribute, consume, or acquire alcoholic beverages, and it is illegal for anyone over the age of 21 to provide alcohol to someone under the age of 21.

b) The possession, sale, distribution, and consumption of alcoholic beverages on the University's campuses or in connection with University-sponsored or related events is permitted only within the limits prescribed by Washington local, state and federal laws, and in accordance with any rules, regulations, policies, and programs that may be established by the University. Examples of those regulations include the Resident Handbook and the Code of Student Conduct.

c) Under the Code of Student Conduct the following behaviors are considered inconsistent with the University's Community Standards, and therefore could subject a student to sanctions: (1) the consumption, possession, purchase, sale, or distribution

of alcoholic beverages except as permitted by law and by University policy; (2) public intoxication; and(3) being in the presence of alcohol while under the age of 21 in Seattle University sponsored housing or on other University premises, except as permitted by law and by University policy.

d) The Resident Handbook prohibits students under the age of 21 from participating in events where alcohol is being served or being in the presence of alcohol in a residence hall room. No alcohol may be consumed, stored, or taken into a room of a student who is under 21, even if the student has a roommate who is over 21. Presence by a student under the age of 21 in a room where alcohol is permitted to be consumed may lead to the conclusion that the underage individual was consuming alcohol, and the underage individual may be held responsible.

e) The Resident Handbook provides that students who are at least 21 years old may consume alcohol responsibly in the privacy of their rooms with the door closed. However, no alcohol may be consumed in the public areas of University housing, such as the hallways, lobbies, and bathrooms.

f) The Resident Handbook prohibits all students, regardless of age, from possessing alcohol drinking devices or playing drinking games designed for the rapid consumption of alcohol.

g) The Resident Handbook provides that students who are noticeably intoxicated and/or disruptive in their residence hall or apartment may be documented for violation of the alcohol policy.

h) The Resident Handbook prohibits deliveries or shipments of alcohol to a student housing facility.

i) The University strictly prohibits the sale, possession, distribution, manufacture, or consumption of alcoholic beverages at any University-sponsored event, except as expressly permitted by the Campus Policy for Alcohol Use at Events (see Section 1.C).

j) The University strictly prohibits any person from bringing alcoholic beverages into University housing or consuming alcoholic beverages within University housing, except as expressly permitted by the regulations established by Residence Life and Housing's Resident Handbook and the student Housing Agreement.

k) Except as permitted by the Campus Policy for Alcohol Use at Events, open containers of alcohol are prohibited in all public areas of the University campuses. This includes any holder or receptacle of alcohol where the seal has been broken and/or holders that

allow unobstructed, unrestricted, or otherwise open access to alcohol. This includes, but is not limited to cans, cups, bottles, kegs, and flasks.

l) State law and the University strictly prohibit the possession, use, sale, furnishing, or manufacture of false identification by students for the purpose of obtaining alcoholic beverages.

m) The University strictly prohibits aiding or abetting an underage person in the purchase or consumption of alcoholic beverages.

The University will not excuse acts of misconduct committed by students whose judgment is impaired by consumption of alcohol or drugs. Students are expected to assume responsibility for their own behavior and must understand that being under the influence of drugs or alcohol in no way lessens their accountability to the University community. Violations of the law, University community standards, or University rules or policies relating to drug or alcohol use will result in sanctions up to and including dismissal as described in the Code of Student Conduct. In general, students will be disciplined if their use of alcohol or drugs is illegal or threatens to create public disorder, public disturbances, danger to themselves or others, or property damage. In addition, the University has the right to refer suspected unlawful drug or alcohol-related incidents to appropriate federal, state, or local legal authorities.

ii. Drugs

a) The University strictly prohibits the manufacture, sale, possession, distribution, dispensing, or use by a student of a controlled or illegal substance not medically authorized.
b) The University strictly prohibits the manufacture, sale, possession, distribution, or dispensing by a student of drug paraphernalia.
c) The University prohibits public intoxication by any drug.
d) The University prohibits students from consuming, possessing, purchasing, selling, distributing, or misusing marijuana/cannabis, as well as public intoxication from use of marijuana/cannabis. All students are prohibited from storing, providing, being in the presence of, or using marijuana/cannabis on University premises or at official University functions, regardless of location.

Resources

Code of Student Conduct

Resident Handbook

Student Housing Agreement

Counseling and Psychological Services (CAPS)

(206) 296-6090
caps@seattleu.edu

Student Health Center

Bellarmine Hall #107
(206) 296-6300
studenthealthcenter@seattleu.edu

Wellness and Health Promotion Student Center 380

(206) 296-8450
wellness@seattleu.edu

TimelyCare

B. Policy on Drug or Alcohol Use by Employees

Seattle University employees have the responsibility to perform their jobs in a safe, conscientious, and effective manner. University employees must be able to work in a drug-free environment and themselves be free from the effects of illegal substances. Accordingly, in connection with all workplace or University-related activities, the following rules apply:

i. Alcohol

The consumption of alcohol is prohibited except where a legal permit or advance consent from the University has been obtained. Consumption of alcohol by any employee under the age of 21 is strictly prohibited.

Violations of the policies on alcohol use by employees will result in disciplinary action up to and including immediate termination of employment. In addition, the University has the right to notify local, state, or federal legal authorities of suspected illegal activity relating to drugs or alcohol. The University encourages employees who observe or have knowledge that an employee is impaired by drugs or alcohol while at work or while participating in University activities to report such condition to the appropriate supervisor.

In some instances, substance misuse may be considered a disability covered by federal, state, and local laws. The University complies with the Americans with Disabilities Act, Section 504 of the Rehabilitation Act, and state and local laws that extend protection from discrimination in employment to qualified individuals with disabilities. The University also provides reasonable accommodations for individuals with disabilities. Any employee who suspects they have a drug or alcohol use problem is encouraged to seek assistance through the employee's own efforts before the problem affects the employee's employment status. The University provides an Employee Assistance Program to assist employees who seek help.

The University's Human Resources Office also maintains a list of agencies that provide rehabilitative and counseling services, in compliance with the federal Drug-Free Workplace Act of 1988, and the Drug-Free Schools and Communities Act Amendments of 1989. In addition, the University pays in full for an independent, confidential Employee Assistance Program.

Contact information for campus and community services is provided in Section III of this section.

ii. Drugs

The University strictly prohibits the manufacture, sale, possession, distribution, dispensing, or use by an employee of a controlled substance or drug not medically authorized, and the University strictly prohibits the use by an employee of a controlled substance (e.g., prescription medication) that affects job performance or poses a hazard to the safety and welfare of the employee or others.

The Drug-Free Workplace Act requires an employee who is convicted of any workplace- related criminal drug violation to report the conviction to the Office of Human Resources within five (5) calendar days after the conviction. Recipients of grants ("grantees"), whether the University or the individual, must report in writing to the contracting or granting agency within 10 calendar days of receiving notice of the conviction.

Resources

Human Resources

Employment Policies
1313 E. Columbia Building
(206) 296-5870

C. Campus Policy on Alcohol Use at Events

To serve or sell alcohol on campus, an event sponsor must complete an Alcohol Service Request Form ("ASRF") for an event and obtain a state permit, subject to limited exceptions. Please visit the University Events ("UE") website for a description of the type of permit you will need. If UE grants permission for alcohol service, it will sign the license application and return it to the event sponsor, who must mail it to the Washington State Liquor Control Board ("WSLCB") with a check for the required fee. The permit/license must be posted during the event near the alcohol service area.

The event sponsor is responsible, along with individuals directed to serve the alcohol, for compliance with all applicable laws (including the acquisition of all required permits), ordinances, and University policies pertaining to the use, sale, furnishing, or possession of

alcohol. The license application must be submitted to the WSLCB at least 45 days prior to the event.

Under Washington law, alcohol may not be served to any person under the age of 21. A separate alcohol serving area may be required at events where persons under 21 will be present. The event's sponsor will also be required to devise a system by which picture identification will be checked to verify legal age.

Washington law also requires that alcohol be served and monitored and not left unattended so as to allow free access. All service of alcohol to guests must stop 30 minutes prior to the ending time of the event. No alcoholic beverages may be consumed in public areas or on University property without the University's prior written approval. In addition, no open containers of alcohol are permitted on University property at any time, except within the area covered by a valid liquor permit. Non-alcoholic beverages and food must be available and featured prominently at the event. Name brand beverages, high protein, and low salt foods are encouraged.

No event shall include any form of "drinking contest" or "drinking game" in its theme, activities, or promotion. Alcohol should not be used as an inducement to participate in a campus event.

Event sponsors (persons who sign for the banquet permit/special occasion license) and the individuals directed to serve the alcohol are responsible and obligated to refuse alcohol to anyone whom they believe has had too much to drink. The person named on the permit/license can and will be held responsible for all alcohol-related incidents.

"BYOB" events, kegs, or hard liquor of any kind are not permitted in University facilities or anywhere on campus. The University reserves the right to deny or limit the consumption of alcoholic beverages on the campus. For events where alcohol is served, the event sponsor is required to hire, at its own expense, and use alcohol servers who are employees of the University's food services manager.

For additional information, contact University Events at (206) 296-5620.

Resources Related to Campus Events

University Events

https://www.seattleu.edu/office-directory/university-events/
1313 E. Columbia Building
(206) 296-5620
rooms@seattleu.edu

Internal Event Request form:

https://reservations.seattleu.edu/EMSWebApp/

External Event Request form:

https://reservations.seattleu.edu/EMSWebApp/

D. Redhawks Care Policy – Medical Amnesty

At Seattle University, the health, safety, and welfare of our students and community are paramount concerns. All students are expected to inform appropriate officials in the event of any health or safety risk or emergency—specifically those involving alcohol or drug use—even if violations of the Code may have occurred in connection with such a risk or emergency. Because the University understands that concern about possible disciplinary action may deter requests for emergency assistance, the University has adopted the Redhawks Care Policy to alleviate such concerns and promote responsible action on the part of students.

In a situation involving imminent threat or danger to the health or safety of any individual(s), students are expected to:

1. Contact Public Safety by calling 206-296-5911 and/or 911 to report the incident on-campus and 911 off-campus;
2. Remain with the individual(s) needing emergency treatment and cooperate with emergency officials; and
3. Meet with appropriate University officials after the incident and cooperate with Integrity Formation procedures following the incident.

To encourage reporting and participation in the process, the University may offer amnesty from certain policy violations, such as underage alcohol consumption or the use of illicit drugs, related to the incident. Granting amnesty is a discretionary decision made by the Office of the Dean of Students, and amnesty does not apply to more serious allegations, such as physical abuse of another or illicit drug distribution. The Office of the Dean of Students will consider the positive impact of taking responsible action in an emergency situation by the reporting student and/or the impact of the emergency on the impacted student when determining the appropriate response for alleged violations of the Code. This response can include not initiating an integrity formation process for a student. The policy does not preclude or prevent actions by policy or other legal authorities.

A student's failure to take responsible action in a risky or emergency situation, however, may void all protections under this provision, may constitute an aggravating factor for purposes of sanctioning, and may lead to further disciplinary actions when such failure to act otherwise constitutes a violation of University rules, regulations or policies.

E. State and Federal Laws and Sanctions

Please see Appendix A for information regarding state and federal laws and sanctions.

II. Health Risks of Alcohol and Drug Use

Alcohol and illegal drug use poses many physical and mental health risks. For family, friends, and coworkers, the ability to recognize the physical, behavioral, and psychological signs of substance misuse can be helpful to intervene and/or report as appropriate.

A. Physical, Behavioral, and Psychological Signs of Alcohol and Drug Misuse

Physical and health warning signs of alcohol or drug misuse:

- Eyes that are bloodshot or pupils that are smaller or larger than normal
- Frequent nosebleeds could be related to snorted drugs (meth or cocaine)
- Changes in appetite or sleep patterns
- Sudden weight loss or weight gain
- Seizures without a history of epilepsy
- Deterioration in personal grooming or physical appearance
- Injuries/accidents and they won't or can't tell you how they got hurt
- Unusual smells on breath, body, or clothing
- Shakes, tremors, incoherent or slurred speech, impaired or unstable coordination

Behavioral Signs of Alcohol or Drug Misuse:

- Drop in attendance and performance at work or school; loss of interest in extracurricular activities, hobbies, sports or exercise; decreased motivation
- Complaints from co-workers, supervisors, teachers, or classmates
- Unusual or unexplained need for money or financial problems, borrowing or stealing, missing money or valuables
- Silent, withdrawn, engaged in secretive or suspicious behaviors
- Sudden change in relationships, friends, favorite hangouts, and hobbies
- Frequently getting into trouble (arguments, fights, accidents, illegal activities)

Psychological warning signs of alcohol or drug misuse:

- Unexplained change in personality or attitude
- Sudden mood changes, irritability, angry outbursts, or laughing at nothing
- Periods of unusual hyperactivity or agitation
- Lack of motivation, inability to focus, appears lethargic or "spaced out"
- Appears fearful, withdrawn, anxious, or paranoid, with no apparent reason

It is important to recognize that while significant changes in academic performance, work performance, and interpersonal relationships are warning signs, persons with substance use disorders may have developed strategies to mask these warning signs. Persons with substance use disorders may be very successful and high functioning members of the community. Social

biases about functioning and productivity should not be criteria to dismiss signs of a potential substance use disorder.

B. Health Effects of Common Drugs of Misuse

The following list is adapted from www.drugabuse.gov, which has a comprehensive list of the effects of commonly used drugs. The list below includes the drugs that most frequently effect the lives of college students, faculty, and staff.

Prescription stimulants and opioids are included in the list. The University affirms that when used as directed and under the care and supervision of a licensed medical provider these medications are safe and provide important therapeutic benefits. Individuals to whom these medications are prescribed are encouraged to regularly communicate with their medical provider regarding any side effects, unexpected changes in mood or behavior, and signs of misuse or addiction. The University encourages individuals who are using opioids or stimulants without a prescription to seek support and help (see Section III: Resources for Education and Treatment).

- **Alcohol** - Stimulant effects in small doses (BAC < .05) and depressant effects in larger doses (BAC > .05); common effects at larger doses include difficulty walking, blurred vision, slurred speech, slowed reaction times, and impaired memory and judgement; excessive alcohol consumption can result in permanent brain and other physical injury or death. Long-term misuse is known to cause issues with heart, liver, and pancreas and weakened immune responses.
- **Cannabis** - Short term use may result in enhanced sensory perception and euphoria followed by drowsiness/relaxation. Common responses to use include slowed reaction time, problems with balance and coordination, increased heart rate and appetite, problems with learning and memory, and anxiety. Long-term use is linked to increased likelihood of mental health concerns (depression, anxiety, and psychosis), chronic cough, and frequent respiratory infections.
- **Cocaine** - Effects of short-term use include narrowed blood vessels; enlarged pupils; increased body temperature, heart rate, and blood pressure; headache; abdominal pain and nausea; euphoria; increased energy; alertness; insomnia; restlessness; anxiety. Even with brief use cocaine may cause erratic and violent behavior, panic attacks, paranoia, psychosis; heart rhythm problems, heart attack; stroke, seizure, coma. Long term use effects include loss of sense of smell; nosebleeds; nasal damage and trouble swallowing from snorting; infection and death of bowel tissue from decreased blood flow; poor nutrition and weight loss; lung damage from smoking. Combination with alcohol increases likelihood of cardiac toxicity.
- **Heroin** - Short term effects include euphoria, dry mouth, itching, nausea, vomiting, analgesia, and slowed breathing and heart rate. Long-term use effects include collapsed veins, abscesses (swollen tissue with pus), infection of the lining and valves in the heart, constipation and stomach cramps, liver or kidney disease, and

pneumonia. Combination with alcohol may cause dangerous slowdown of heart rate and breathing, coma, and/or death.

- **3,4-Methylenedioxy-Methamphetamine (MDMA; Extacy; Molly)** - Short-term effects include lower inhibition, enhanced sensory perception, increased heart rate and blood pressure, muscle tension, nausea, chills and sweating, and sharp rise in body temperature leading to kidney failure or death. Long-term use contributes to confusion; depression; problems with attention, memory, and sleep; increased anxiety; impulsiveness; and disinterest in sex. Combination with alcohol increases risk of neurotoxic effects.
- **Opioids (prescription)** - Short-term effects include pain relief, drowsiness, nausea, constipation, euphoria, slowed breathing, and possibility of death with misuse. Long-term use concerns include addiction and increased risk of overdose and death.
- **Stimulants (prescription)** - Commonly prescribed as Adderall, Amphetamine, Concerta, Ritalin, and Methylphenidate. Short-term effects include increased alertness, attention, energy; increased blood pressure and heart rate; narrowed blood vessels; increased blood sugar; opened-up breathing passages. At high doses, dangerously high body temperature and irregular heartbeat, heart disease, seizures. Long-term misuse risks include heart problems, psychosis, anger, paranoia.
- Tobacco/Nicotine and Vaping - Short-term use increases blood pressure, breathing, and heart rate, exposes lungs to a variety of chemicals and to metallic vapors created by heating the coils in the device. Long-term use greatly increases risk of cancer, especially lung cancer when smoked and oral cancers when chewed, chronic bronchitis, emphysema, heart disease, leukemia, cataracts, and pneumonia.

For a more comprehensive listing of the effects of commonly used drugs, please see https://nida.nih.gov/drug-topics/commonly-used-drugs-charts.

Resources Related to Substance Use Health Effects

National Institute on Drug Abuse

National Institute on Alcohol Abuse and Alcoholism

Learn About Cannabis Washington

College Drinking

Alcohol eCheckup to Go for Seattle University Students

Cannabis eCheckup to Go for Seattle University Students

Wellness and Health Promotions Substance Use Education Site

III. Resources for Education and Treatment

A. Campus Services for Students

1. Consultation for problems with alcohol and other drug related use is provided by the Student Health Center ("SHC"), Counseling and Psychological Services ("CAPS"), and Wellness and Health Promotion. Students who believe they have a problem or who have a concern about another person are encouraged to seek assistance.
2. SHC and CAPS staff are available for confidential consultation.
3. If screening indicates substance misuse or dependency requiring more focused treatment, individuals will be referred to appropriate community health resources. SCH and CAPS keep a list of community agencies meeting a range of needs and financial capacities. Individuals are responsible for costs incurred for off-campus services.

Campus Support Resources

Counseling and Psychological Services (CAPS)

(206) 296-6090
caps@seattleu.edu

Student Health Center

Bellarmine Hall #107
(206) 296-6300
studenthealthcenter@seattleu.edu

Wellness and Health Promotion

Student Center 380
(206) 296-8450
wellness@seattleu.edu

B. Opioid Overdose Prevention Program

Prescription opioids, such as oxycodone, hydrocodone, and fentanyl are medications prescribed by doctors to treat moderate to severe pain, but that also have serious risks and side effects, including the risk of dependence, addiction, and accidental death by overdose. Yet opioids are increasingly misused recreationally for their pain relieving and other psychological and physiological effects.

Additionally, counterfeit pills made to look like other substances (e.g., hydrocodone, oxycodone, MDMA, Extacy, Molly) but laced with fentanyl have been surfacing in communities everywhere and can be potentially fatal. Therefore, as part of the University's ongoing

commitment to the health and safety of students, faculty, staff, visitors, and local community members, the University is introducing the availability of naloxone (brand name: Narcan) in strategic locations throughout campus. Beginning in September 2023, community members will notice that AED ("Automated External Defibrillator") cabinets across campus have been affixed with distinctive purple stickers indicating the presence of opioid overdose kits. There are 36 AED cabinets in buildings across campus; 24 of these cabinets are stocked with opioid overdose kits. Additionally, Public Safety officers have additional units of naloxone available in the event of an emergency.

If a community member observes someone on campus who appears to be experiencing an opioid overdose, they should first call Public Safety at 206-296-5911 or call 911 and stay with the person until help arrives. Public Safety officers have been trained on how to properly administer naloxone and how to take steps to prevent possible secondary exposure. University community members are not expected to administer naloxone; however, if they choose to do so while awaiting help from Public Safety and emergency medical personnel, they should follow the guidelines for administering the medication available on the American Medical Association's website. Written instructions are also available inside the opioid overdose kits.

C. Community Services

A variety of community organizations in the greater Seattle area offer resources that can be used by Seattle University students, faculty, or staff. We have divided them into three categories for ease of reference: 24-hour emergency numbers, self-help groups, and alcohol and drug treatment programs. Resources are also listed on the Student Health Center website. These resources have not been screened by Seattle University and the University makes no specific endorsement of or recommendations to any one program.

Emergency, Crisis, and Referral Lines and Support Groups

Emergency and Crisis Lines

Crisis Connections 24-Hour Crisis Line
(206) 461-3222
1-866-427-4747

Alcohol and Drug 24-Hour Helpline
(206) 722-3700
1-800-562-1240

Domestic Violence 24-Hour Hotline
1-800-562-6025

King County Sexual Assault Resource Center
1-888-998-6423 (24-Hour)
(425) 226-5062 (English)
(425) 282-0324 (Spanish)
(425) 282-0324 (TTY)

HIV/AIDS 24-Hour Hotline
1-800-342-2437 (English)
1-800-344-7432 (Spanish)
1-800-243-7889 (TTY)

Referral Lines

Washington 2-1-1

211 (Washington State) provides the most current and comprehensive database of community resources in the State of Washington (over 27,000 listings), which serves as a central access point for connecting Washington's 7.1 million residents to community resources. By simply dialing the number 2-1-1 or searching the website, people can connect to help when they need it regardless of who provides the services or where the services are located.

SAMHSA
1-800-662-HELP (4357)

The Washington Recovery Helpline
1.866.789.1511

Support Groups

Al-anon/Alateen/Alatot
(206) 625-0000

Alcoholics Anonymous
(206) 587-2838

Marijuana Anonymous
(206) 414-9270

Nar-Anon

Narcotics Anonymous
(206) 790-8888

Alcohol and Drug Treatment

Greater Seattle

Alcohol and Drug 24-Hour Helpline
Crisis Intervention/Referral Information
(206) 722-3700

Addiction Recovery Services
Inpatient
Swedish Medical Center - Ballard 5300 Tallman Ave. NW
Seattle, WA 98107
(206) 781-6209

Catholic Community Services
Outpatient
100 23rd Ave. South Seattle, WA 98122
(206) 323-6336

Central Seattle Recovery Center
Outpatient
1401 E. Jefferson, Suite 300
Seattle, WA 98122
(206) 322-2970

Central Youth and Family Services
Outpatient
1901 Martin Luther King Jr. Way South Seattle, WA 98144
(206) 322-7676

Consejo Counseling and Referral
Outpatient, Bilingual (Spanish)
3808 South Angeline
Seattle, WA 98118
(206) 461-4880

Residence XII
Inpatient/Outpatient
12029 113th Ave. NE
Kirkland, WA 98034
(425) 823-8844

Seattle Indian Health Board
Inpatient/Outpatient
611 12th Ave South
Seattle, WA 98144
(206) 324-9360

Therapeutic Health Services
Outpatient
1116 Summit
Seattle, WA 98101
(206) 323-0930

Veterans Administration
Assessment/Evaluation
Medical Center
1660 S. Columbian Way Seattle, WA 98108
(206) 762-1010
1-800-329-8387

A Positive Alternative
Outpatient
4649 Sunnyside Ave. N., Suite 200
Seattle, WA 98103
(206) 547-1955

Eastside

Therapeutic Health Services - Eastside
Outpatient
1412 140th Pl NE
Bellevue, WA 98005
(425) 747-7892

Lakeside Milam Recovery Center Inc.
Inpatient/Outpatient
10322 NE 132nd St.
Kirkland, WA 98034
(425) 823-3116

Snohomish County

Evergreen Health Monroe Alcoholism and Drug Recovery Center
Inpatient/Outpatient
14701 179th Ave SE
Monroe, WA 98272
(360) 794-1405

Pierce County

Tacoma-Pierce County Health Department
Referral Listing

The Center Metropolitan Development Council
Outpatient
721 South Fawcett, Suite 203
Tacoma, WA 98402
(253) 383-3921

These treatment centers have not been screened by Seattle University and the University makes no specific endorsement of or recommendations to any one program.

9.1 State and Federal Laws & Sanctions Concerning Drugs and Alcohol

In addition to Seattle University alcohol and drug policies and disciplinary sanctions, all students, faculty and staff should be aware that federal, state, and local laws treat illegal use, possession, sale, distribution or manufacture of drugs or alcohol as serious crimes. Conviction can result in strict penalties including imprisonment and fines. Felony or other convictions can prevent you from entering fields of employment or professions and may have to be disclosed on applications for employment or admission to graduate or professional schools.

Listed below is a summary of federal, state, and local laws and sanctions concerning drugs and alcohol.

A. Federal Drug Laws

Federal law prohibits the possession, use, distribution, or manufacturing of illegal drugs. (Controlled Substances Act, 21 U.S.C. § 801, et seq.). There are strict penalties for drug convictions, including mandatory prison terms for many offenses. The following information provides a brief overview of federal penalties for first convictions. All penalties are doubled for any subsequent drug conviction.

i. Denial of Federal Benefits (21 U.S.C. § 862)

A federal drug conviction may result in the loss of federal benefits, including school loans, grants, scholarships, contracts, and licenses. Federal drug trafficking convictions may result in denial of federal benefits for up to five years for a first conviction. Federal drug convictions for possession may result in denial of federal benefits for up to one year for a first conviction and up to five years for subsequent convictions.

ii. Forfeiture of Personal Property and Real Estate (21 U.S.C. § 853)

Any person convicted of a federal drug offense punishable by more than one year in prison shall forfeit to the United States any personal or real property related to the violation, including houses, cars, and other personal belongings.

iii. Federal Drug Trafficking Penalties (21 U.S.C. § 841)

Penalties for federal drug trafficking convictions vary according to the quantity of the controlled substance involved in the transaction. The list below is a sample of the range and severity of federal penalties imposed for first convictions. Penalties for subsequent convictions are twice as severe.

If death or serious bodily injury results from the use of a controlled substance which has been illegally distributed, the person convicted on federal charges of distributing the substance faces a mandatory life sentence and fines ranging up to $8 million.

Persons convicted on federal charges of drug trafficking within 1,000 feet of a University (21 -U.S.C. § 860) face penalties of prison terms and fines which are twice as high as the regular penalties for the offense, with a mandatory prison sentence of at least one year.

Penalty – Prison: 10 years – life Fine: Up to $10 million

Heroin – 1 kg or more

Cocaine – 5 kg or more

Crack Cocaine – 280 gm or more

Methamphetamine – 50 gm or more

PCP – 100 gm or more

LSD – 10 gm or more

N-Phenyl-N-Propanamide – 400 gm or more

Penalty – Prison: 5 years – 40 years Fine: Up to $5 million

Heroin – 100 – 999 gm

Cocaine – 500 – 4,999 gm

Crack Cocaine – 28 – 279 gm

Methamphetamine – 5 – 99 gm

PCP – 10 – 99 gm

LSD – 1 – 9 gm

N-Phenyl-N-Propanamide – 40 – 399 gm

Penalty – Prison: Up to 3 years Fine: Up to $250,000

Amphetamines – Any Amount

Barbiturates – Any Amount

Marijuana

Prison: Up to 5 years Fine: Up to $250,000 – Less than 50 kg

Prison: Up to 20 years Fine: Up to $1 million – 50 – 99 kg

Prison: 5 years – 40 years Fine: Up to $5 million – 100 – 999 kg

Prison: 10 years – life Fine: Up to $10 million – 1000 kg or more

iv. Federal Drug Possession Penalties (21 U.S.C. § 844)

Persons convicted on federal charges of simple possession of any controlled substance face penalties of up to one year in prison and a mandatory fine of no less than $1,000 up to a maximum of $100,000. Second convictions are punishable by not less than fifteen days but not more than two years in prison and a minimum fine of $2,500. Subsequent convictions are punishable by not less than ninety days but not more than three years in prison and a minimum of $5,000.

B. Washington State Drug and Alcohol Laws

Listed below is a summary of Washington State laws concerning drugs and alcohol.

i. Washington Alcohol Beverage Control Law (Title 66 RCW)

- Sell, give, or supply liquor to any person under the age of 21.
  - Prison: Not more than 364 days
  - Fine: Not more than $5,000
- Possession, consumption, or acquisition of liquor by any person under the age of 21 (e.g., minor in possession).
  - Prison: Not more than 364 days
  - Fine: Not more than $5,000
- Purchase or attempted purchase of liquor by any person under the age of 21.
  - Prison: Not more than 90 days
  - Fine: Not more than $1,000 ($250 if between 18 and 20 old)

ii. Washington Uniform Controlled Substances Act (RCW 69.50, et seq.)

- Manufacture, deliver, or sell less than 2 kg of a Schedule I or Schedule II Narcotic.
  - Amount: Less than 2 kg
  - Prison: Not more than 10 years
  - Fine: Not more than $25,000
- Manufacture, deliver, or sell more than 2 kg of a Schedule I or Schedule II Narcotic.
  - Amount: More than 2 kg or more
  - Prison: Not more than 10 years
  - Fine: Not more than $100,000 for the first 2 kg and $50,000 for each additional gram.
- Manufacture, deliver, or sell any other controlled substance classified in Schedule I, II, III, IV, or V.
  - Amount: Any
  - Prison: Not more than 5 years
  - Fine: Not more than $10,000
- Possession of a controlled substance
  - Amount: Any
  - Prison: Not more than 90 days
  - Fine: Not more than $1,000

iii. Washington State Marijuana Law

On November 6, 2012, voters in Washington State passed Initiative 502, allowing people over the age of 21 years to possess small amounts of marijuana for personal use. While this is a significant change in state law, Seattle University's policy remains unchanged: use and possession of marijuana on campus or during any University-sponsored or affiliated activity or program is prohibited. Seattle University's policy is in compliance with the federal Drug-Free Schools and 113 Communities Act that went into effect in 1990. Under this federal law, as a condition of receiving federal funds, an institution of higher education such as Seattle University must certify that it has adopted and implemented a program to prevent the unlawful possession, use or distribution of illicit drugs and alcohol by students and employees on campus and as part of its activities and programs. At the federal level, this law includes any amount of marijuana.

I-502 creates a conflict between state and federal laws. When state and federal laws are in conflict, federal law takes precedence. If Seattle University does not comply with federal law and regulations on marijuana possession and use on campus and in University programs and activities, it risks losing federal funds for student financial aid, faculty research, and in other areas. Consequently, the Seattle University community must continue to abide by federal laws and regulations and University policy barring the use or possession of any amount of marijuana on campus or in association with University-sponsored or affiliated activities.

10 SEATTLE UNIVERSITY FIREARMS AND WEAPONS POLICY

Seattle University is committed to ensuring a safe and secure environment for the University community. This policy is a proactive step towards reducing the risk of injury or death associated with intentional or accidental use of firearms and weapons.

Policy

All members of the Seattle University community, including faculty, staff, students and visitors are prohibited from possessing, discharging, or otherwise using firearms, explosives, or weapons ("weapons") on University premises without the expressed authorization of the Director of Campus Public Safety, whether or not the person has been issued a federal or state license to possess such weapons.

All members of the Seattle University community are also prohibited from possessing weapons while working or attending University or University-related events, whether or not the event is on University premises.

Any person violating this policy will be subject to disciplinary action including but not limited to suspension, expulsion, termination, removal from University premises or events and/or criminal prosecution.

Suspected violations of this policy should be reported immediately to the Department of Campus Public Safety at (206) 296-5911.

Exceptions

The following exceptions apply to this policy:

- Commissioned law enforcement officers in performance of their official duties.
- Military personnel in performance of their official duties.
- Armored vehicle guards.
- An individual using or possessing a weapon in connection with a scheduled educational, recreational or training program or activity authorized in writing by the Director of Campus Public Safety and under the supervision of a University employee.
- Additional exceptions to this policy may be requested in writing to the Director of Campus Public Safety. The Director will review requests on a case-by-case basis with University Counsel.

Definitions

• **Firearm** - Any device that shoots a bullet, pellet, flare, tranquilizer, dart, or other projectile, whether loaded or unloaded, including those powered by CO2. This includes but is not limited

to guns, air guns, dart guns, pistols, revolvers, rifles, shot guns, cannons, and any ammunition for any such device.

• **Weapon** - Any device that is designed to or traditionally used to inflict serious bodily injury. This includes but is not limited to:

- Firearms, slingshots, switchblades, daggers, swords, blackjacks, brass knuckles, bows and arrows, tasers, hand grenades, knives with blades three (3) inches or longer, nunchucks, and throwing stars; or
- Any object that could be reasonably construed as a weapon; or
- Any object legally controlled as a weapon or treated as a weapon under the law.

• **Explosives** - Any dangerous chemicals, substances, mixtures or compounds capable of or intended to cause injury to another or possessed in negligent disregard for the safety of self and others. This includes but is not limited to firecrackers, gunpowder and dynamite.

11 SEX OFFENDER REGISTRY AND ACCESS TO RELATED INFORMATION

Incarceration may remove a sex offender from the streets, but it does nothing to prevent the offender from committing another crime when released.

The federal Campus Sex Crimes Prevention Act, enacted on October 28, 2000 went into effect October 28, 2002. The law requires institutions of higher education to issue a statement advising the campus community where law enforcement agency 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, of each institution of higher education in that state at which the person is employed, carries on a vocation, or is a student.

In the state of Washington, convicted sex offenders must register in accordance with all applicable state laws, including but not limited to:

• RCW 9A.44.130

• RCW 9A.44.138

• RCW 9A.44.140

To obtain information about sex offenders in any county in the state of Washington, including King County, access the Washington State Sex Offender Registry website. The National Sex Offender Public Website is also available. Additional information on sex offender registration in the state of Washington is available online from the Washington Association of Sheriffs & Police Chiefs.

12 MISSING STUDENT NOTIFICATION POLICY AND PROCEDURES

This policy is established by Seattle University in compliance with the *Higher Education Opportunity Act of 2008* and applies to residential students at the college. For the purposes of this policy, a student may be considered to be a *"missing person"* if the person's absence from campus is contrary to his/her usual pattern of behavior and unusual circumstances may have caused the absence. Such circumstances could include, but not be limited to, a report or suspicion that the person may be a victim of foul play, has expressed suicidal thoughts, is drug dependent, is in a life threatening situation, has been with persons who may endanger the student's welfare, or is overdue to return to campus and is not heard from after giving a specific return time to friends or family.

Designation of emergency contact information

a. **Students age 18 and above and emancipated minors**
   Students will be given an opportunity during the annual registration process to designate an individual to be contacted by the college no more than 24 hours after the time that the student is determined to be missing. This information is part of the University registration and is protected under FERPA. This information is accessible by Housing and Public Safety. This information will not be disclosed outside of a missing person investigation. The designation will remain in effect until changed or revoked by the student.
b. **Students under the age of 18**
   If a student under the age of 18 is determined to be missing, the college is required to notify a custodial parent or guardian no more than 24 hours after the student is determined to be missing.
c. **All residential students (both a and b above)**
   If a student is determined to be missing, the University will notify the appropriate law enforcement agency not later than 24 hours after the determination has been made.

Missing Student Procedure

a. Any individual on campus who has information that a residential student may be a missing person must notify the Seattle University Department of Public Safety immediately.
b. The Department of Public Safety (DPS) will gather all essential information about the missing resident student from the reporting person, from the student's acquaintances and from University personnel and official University information sources. Such information will include a physical description, cellular phone number, clothes last worn, where the student might be, who the student might be with, vehicle description, information about the physical and emotional well-being of the student, an up-to-date

photograph, a class schedule, when last attended class, last use of their Campus Card, etc.

c. Appropriate campus staff including the On-call DPS Administrator; DPS Supervisor on Duty; Dean of Students and Residence Life Staff will be notified to aid in the search and location of the student. Contact with the student should be attempted using physical searching; text messaging; cellular phone calls; and e-mail.
d. If search efforts are unsuccessful in locating the student in a reasonable amount of time OR it is apparent immediately that the student is a missing person (e.g. witnessed abduction), OR it has been determined that the student has been missing for more than 24 hours, the Department of Public Safety will contact the Seattle Police Department (appropriate local law enforcement agency) to report the student as a missing person. The Seattle Police Department will take charge of the investigation with assistance from University officials.
e. No later than 24 hours after determining that a residential student is missing, the Dean of Students or the Vice Provost for Student and Campus Life will notify the emergency contact previously identified by the student (for students 18 and over) or the custodial parent/guardian (for students under the age of 18) and advise that the student is believed to be missing.

Communications about missing students

a. In accordance with established college emergency guidelines procedures, the V.P. University Affairs will be part of the University administrative response team and is the designated spokesperson to handle media inquiries concerning a missing student.
b. The law enforcement agency responsible for the investigation, in the jurisdiction the student is reported missing from, and the law enforcement public information officer (PIO) will be consulted by the Vice President and University Counsel; University Director of Public Safety; and the University AVP of Marketing and Communication, prior to any information release from the University so as not to jeopardize any investigation.
c. Information provided to the media to elicit public assistance in the search for the missing person will be handled by the local law enforcement agency.

Student notification of this policy

- Included on the Seattle University Housing website.
- Discussed at the beginning of the quarter in Housing meetings.
- Included in the annual Campus Security Report.
- Sent to students by University email.
- Included on the Public Safety website.
- Included on the Vice Provost for Student and Campus Life website.
- Included in the annual paper version of the Student Handbook.

13 TIMELY WARNING NOTIFICATION POLICY

In compliance with the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act (the "Clery Act"), 20 U.S.C. 1092 (f), Seattle University issues timely warning notifications to alert the campus community to Clery Act crimes that the University determines represent a serious and ongoing threat to the campus. The University may distribute timely warning notifications using a variety of means, including emails, text messages, fliers, and website announcements posted on the Campus Public Safety website.

A. What circumstances require issuing a timely warning?

Timely warning notifications are issued on a case-by-case basis for Clery Act crimes reported to Campus Public Safety, Campus Security Authorities, or local police agencies that pose a "serious and ongoing threat" to students and employees on campus or in the immediate campus area. In deciding whether to issue a timely warning notification, the University considers all of the facts surrounding the incident such as the nature of the crime, the continuing danger to the campus community, and the possible risk of compromising law enforcement efforts. Incidents that may result in issuing a timely warning notification include the following Clery Act crimes:

- **Criminal Homicide**
  - Murder and Non-negligent manslaughter
  - Manslaughter by negligence

- **Sexual Assault**
  - Rape
  - Fondling
  - Incest
  - Statutory Rape

- **Robbery**

- **Aggravated Assault**

- **Burglary**

- **Motor Vehicle Theft**

- **Arson**

B. When will timely warning notifications be issued?

The University will issue a timely warning notification as soon as it determines there is a serious and ongoing threat to students or employees on campus and/or in the immediate campus area. The determination will be made based on the information that Campus Public Safety has available to it at the time.

C. What department or individual is responsible for issuing the timely warning?

The Director of Campus Public Safety or their designee is responsible for preparing and distributing timely warning reports. Campus Public Safety may be reached at (206) 296-5990.

D. How are timely warning notifications distributed?

In most instances, the timely warning will be issued through the University's email system to students, faculty and staff. Depending on the particular circumstances of the crime or threat, Campus Public Safety may also notify the campus community through text messages, fliers posted at residence halls, academic buildings, and/or the Student Center, announcements posted on the Campus Public Safety website, and/or statements in The Spectator student newspaper.

E. What is included in a timely warning notification?

The intent of a timely warning notification is to enable members of the campus community to protect themselves. A timely warning will include information that promotes safety and aids in the prevention of similar crimes, such as the following information:

- A brief statement of the incident
- Possible connection to other incidents, if applicable
- Physical description of any suspect(s), if available
- Photo or composite drawing of any suspect(s), if available
- Date and time of the incident
- Other relevant information

F. How should a crime be reported?

Anyone with information about a Clery Act crime or other serious incident should report the circumstances to Campus Public Safety, by phone at (206) 296-5911 or in person at Campus Public Safety in the Columbia Building (1313 E. Columbia St., Seattle, WA 98122). To report a crime or an emergency off-campus, dial 911. You may also use the emergency "blue light" phones stationed around campus.

G. Are there confidential reporting procedures?

If you are the victim of or witness to a crime and do not want to pursue action within the University system or the criminal justice system, you may still want to consider making a confidential report. The purpose of a confidential report is to comply with your wish to keep the matter confidential, while taking steps to ensure the future safety of yourself and others. With such information, the University can keep accurate records of the number of incidents involving students, determine where there is 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 counted and disclosed in the University's annual crime statistics and may result in a timely warning notification.

14 EMERGENCY PROCEDURES

Seattle University is committed to the safety of our campus community and meeting the requirements of the Clery Higher Education Act. Notification to the campus community about immediate threats to health and safety are the responsibility of the University's Department of Public Safety. The senior on- duty Public Safety employee or their designee, under the direction of the Director of Public Safety, will be responsible for determining if emergency notification to the campus or portions of the campus should be made and ensuring that the communication is sent. Should the University's Department of Public Safety become aware of an emergency situation affecting the larger community, notification would be made directly to the Seattle Police Department and/or other government authorities responsible for disseminating emergency information to the public.

14.1 Reporting Health and Safety Emergencies

The University's Department of Public Safety is available 24 hours a day and housed on campus in the lower level of the Columbia Building (1313 E. Columbia St., Seattle, WA 98122) and reachable by telephone at (206) 296-5990 or on the campus emergency phone number (206) 296-5911. Any campus community member who becomes aware of an incident that affects the immediate health and safety of the community (such as, but not limited to: a gas leak, bomb threat, armed intruder, chemical/hazardous material spill, fire) should immediately seek a safe location and contact the Department of Public Safety at (206) 296-5911 and report the information.

14.2 Emergency Notification Policy

Upon notification that a significant threat to the campus community exists, the senior on-duty Department of Public Safety employee or their designee will immediately begin to verify if a threat exists through available resources on campus or by confirmation with the local city and county partners (Seattle Police, Seattle Fire Department, or King County Public Health would be the usual consulting partners). Upon confirmation that an immediate significant threat to the community or a portion of the community exists, the senior on-duty Department of Public Safety employee or their designee will, without delay and taking into account the safety of the campus community, determine what information to release about the situation and will initiate emergency communication to the campus community or those specifically in danger. The communication method(s) used will be tailored to specific incident and may include but are not limited to:

- SMS text messaging through the Omnilert service (available to every campus community member)
- Computer desktop pop-up alerts (available on most University workstations)
- University email
- Local building voice evacuation systems or alarms

The senior Public Safety employee on duty or their designee will use those systems which are most effective at reaching the affected on- and off-campus community members and notifying them of the threat. In the case of emergencies that require notifications of the larger neighborhood or community, the Seattle Police and Fire departments will be notified, depending on the type of emergency, so their community safety notification systems can be activated.

Seattle University will not immediately issue a notification to the campus community for a confirmed emergency or dangerous situation when doing so would compromise efforts to assist a victim, contain the emergency, respond to the emergency, or otherwise mitigate the emergency. The University will request assistance from local emergency services and local media to alert the local community to significant threats that are determined to have impact beyond the immediate campus community.

14.3 Emergency Operations

The Department of Public Safety maintains a 24-hour communications center, Emergency Operations Center (EOC), and Public Safety patrol staff on campus. Public Safety patrol staff are trained to respond to campus emergencies, assist in medical aid, assist in the evacuation of campus buildings, and to coordinate the response of the local Seattle Police and Seattle Fire Departments for significant life safety emergencies. Public Safety officers are trained in the FEMA incident command structure to assist them in responding in a standard and coordinated manner with local agencies. In the event of a significant, large-scale or long-duration emergency, the University may activate the EOC as necessary to support emergency response and coordination with external agencies.

Campus evacuation and safety information is available on the Public Safety website and in the following sections of this report. In addition, Seattle University maintains a Building Marshal program to provide trained resource persons at evacuation areas should a building need to be evacuated. These people will be able to provide guidance to those in the evacuation and are trained to be a communication resource between Seattle University Public Safety and those in the evacuation area.

Seattle University designates several areas on campus as evacuation locations. These are spaces that are generally open areas where the community can gather should evacuation be required from a campus building. A map of the campus evacuation areas is found in Section 15.8. These are suggested areas for evacuation and unforeseen events may make an evacuation area unsafe. Should a community member find a safety hazard at an evacuation area, they should proceed to one of the other evacuation sites and not put themselves in danger.

14.4 General Building Evacuation Plan

In general, the campus community should follow these instructions when an evacuation is required, including in the case of a fire alarm.

Emergency Evacuation — IF THE FIRE ALARM IS ACTIVATED OR PUBLIC SAFETY STAFF ISSUES AN EVACUATION ORDER THEN:

- Proceed to the nearest exit. Help those who need assistance in exiting the building. DO NOT USE ELEVATORS.
- If you are in a room when the alarm sounds, check surface of door and/or doorknob for heat before opening the door. Check bottom of door for signs of smoke.
- If there is no evidence of heat or smoke, slowly open door, keeping the door between you and the corridor. Make a visual observation of corridor for fire or smoke.
- If no smoke or fire is observed, proceed to the nearest exit or stairway. If the nearest exit or stairway is blocked, proceed to the next nearest exit or stairway. CLOSE ALL DOORS BEHIND YOU.
- If all exits or stairways are blocked, go to the nearest room and close the door. If the room has a window, turn the lights on, open the blinds, and use masking tape to mark a large X across the entire window, or tape a large bright colored item onto the window, to signal that the room is occupied. Use wet towels or clothes to block at the bottom of the door to prevent smoke from entering. Don't open the windows as smoke is likely to be drawn into the room.
- If there is a telephone available call ext. 5911 and give the dispatcher your room number, remain calm, stay on the line, and wait for assistance.
- If smoke enters the room, stay as close to the floor as possible to avoid breathing the smoke. DOORS MUST REMAIN CLOSED UNTIL HELP ARRIVES.
- After evacuating the building, move to your Evacuation Assembly Area, located near the building you are evacuating from. Move well away from the building to facilitate movement of emergency response equipment. Do not attempt to re-enter the building until told to do so by Public Safety staff. Should you need to shelter in place for a chemical emergency, follow the Shelter in Place plan.

14.5 General Building Shelter-in-Place Plan

In general, the campus community should follow these instructions when it is necessary to shelter in place, or when evacuation is not an option.

Emergency Action — IF THE SEATTLE EMERGENCY MANAGEMENT OFFICE, LOCAL AUTHORITIES, OR PUBLIC SAFETY STAFF ISSUE A SHELTER-IN-PLACE ALERT THEN:

- Stay indoors. Do not exit the building. Remain calm. All occupants should seek safety in bathrooms.

- Close and secure all doors and windows in the room. Seal door seams with paper, wet clothing, tape, or available material, which will provide an insulation effect.

- Monitor campus email, voicemail, text message, and desktop alerts using a cell phone or computer.

- Turn on any computer and log onto the campus e-mail or check for messages sent on the campus text message alerts. If a radio is available turn a local emergency channel;

KIRO AM 710 or FM 97.3, KOMO AM 1000 or FM 97.7. Wait until the 'All Clear Signal' is given before leaving safety.

- If necessary, cover your mouth and nose with a wet cloth.

14.6 Violent Intruder Plan

Should you encounter an armed intruder or violent person, you must choose your best option to avoid serious harm:

- Run: If safe, RUN. Leave your belongings behind. Do not run in a straight line.

- Hide: Turn off lights and lock the doors. Remain Silent. Get on the floor and move to a safe area. Hide behind large items (e.g., cabinets, desks). Call ext. 5911. Do not activate fire alarm pull stations. Do not move wounded people. When police arrive, put up your hands. Follow police instructions.

- If your life is in danger, Fight: Fight the intruder as a group. Throw things at the intruder. Use improvised weapons. If possible, take the intruder to the ground. Control the intruder's weapon.

14.7 Campus-Wide Drills

At least once a year, Seattle University completes a campus-wide drill to exercise campus emergency communication systems and emergency procedures. Drills commonly include earthquake scenarios, building evacuations, or shelter-in-place practice. Each drill is announced via University email to all students, faculty and staff approximately two weeks in advance and again on the day of the drill before it commences. Included in the announcements are reminders to the campus community of the relevant emergency procedures and the University's emergency communications systems.

During each drill, Public Safety officers, staff from other involved departments (such as Facilities and Housing & Residence Life), and campus volunteers (including Building Marshals) are positioned throughout campus to assist in verifying proper functionality of emergency communications systems and student, faculty, and staff participation. This also serves as an opportunity for those involved departments to review their internal emergency procedures and communications systems.

In preparation for and during each drill, Public Safety staff review campus-wide emergency communications systems and emergency plans to verify their functionality and effectiveness. Following each drill, Public Safety staff identify any deficiencies for immediate correction and/or areas for future improvement in emergency systems and procedures.

Public Safety maintains records including a description of each drill conducted, the date and time each drill was started and concluded, if each drill was announced or unannounced, as well as the resulting outcomes, deficiencies, and/or recommendations for improvements. This documentation is kept with Public Safety as a document of record for at least seven years.

SEATTLE UNIVERSITY

Emergency Procedures

Evacuation

1. Evacuate the building using exit stairs.
2. Do not use the elevators.
3. Take important personal belongings.
4. Follow directions given by emergency personnel.
5. Assist persons with special needs.
6. Go to the evacuation assembly area and check in.
7. If necessary, emergency personnel may direct you from the evacuation assembly area to an evacuation camp at Championship Field.

Power Outage

1. Remain calm.
2. Provide assistance to others.
3. Turn off or unplug all electronics.
4. Move cautiously to a well-lit area.
5. Evacuate the building.

Earthquake

1. Drop, cover, and hold on. Use desks, tables or the inside wall for cover.
2. After the shaking stops, check for injuries.
3. Evacuate to the assembly area.
4. Report to emergency personnel at the evacuation site.

Fire

1. Activate the nearest fire alarm pull station.
2. Call ext. 5911.
3. Evacuate the building.
4. If your clothing catches fire: STOP, DROP, and ROLL.
5. If there is smoke, stay low and cover your mouth and nose with clothing.
6. If trapped, seal the door and call ext. 5911 or signal from a window for help.

Violent Intruder

Run —

1. If safe, RUN.
2. Leave your belongings behind.
3. Do not run in a straight line.

Hide —

1. Turn off lights and lock the doors.
2. Remain silent.
3. Get on the floor and move to a safe area.
4. Hide behind large items (e.g., cabinets, desks)
5. Call ext. 5911.
6. Do not activate fire alarm pull stations.
7. Do not move wounded people.
8. When police arrive, put up your hands.
9. Follow police instructions.

If your life is in danger, FIGHT —

1. Control the intruder's weapon.
2. Fight the intruder as a group.
3. Throw things at the intruder.
4. Use improvised weapons.
5. If possible, take the intruder to the ground.

Suspicious Activity or Object

Suspicious Activity

1. Do not let anyone into a locked building or room without authorization.
2. Do not physically confront the person.
3. Do not block the person's access to an exit.
4. Call ext. 5911. Provide as much information as possible about the person and their location.

Suspicious Object

1. Do not touch or disturb object.
2. Call ext. 5911.
3. Notify your instructor or supervisor.
4. Be prepared to evacuate.
5. Check-in with your instructor or supervisor.

Hazardous Material

1. Call ext. 5911.
2. Leave the hazardous area.
3. Follow emergency personnel instructions.
4. Alert others to stay clear.
5. Notify emergency personnel if you have been exposed.

Emergency Contacts

Seattle University
Department of Public Safety

Emergencies
(206) 296-5911
or 5911 from a campus phone

Non-Emergencies
(206) 296-5990
or 5990 from a campus phone

seattleu.edu/safety
for more information

Assembly Area

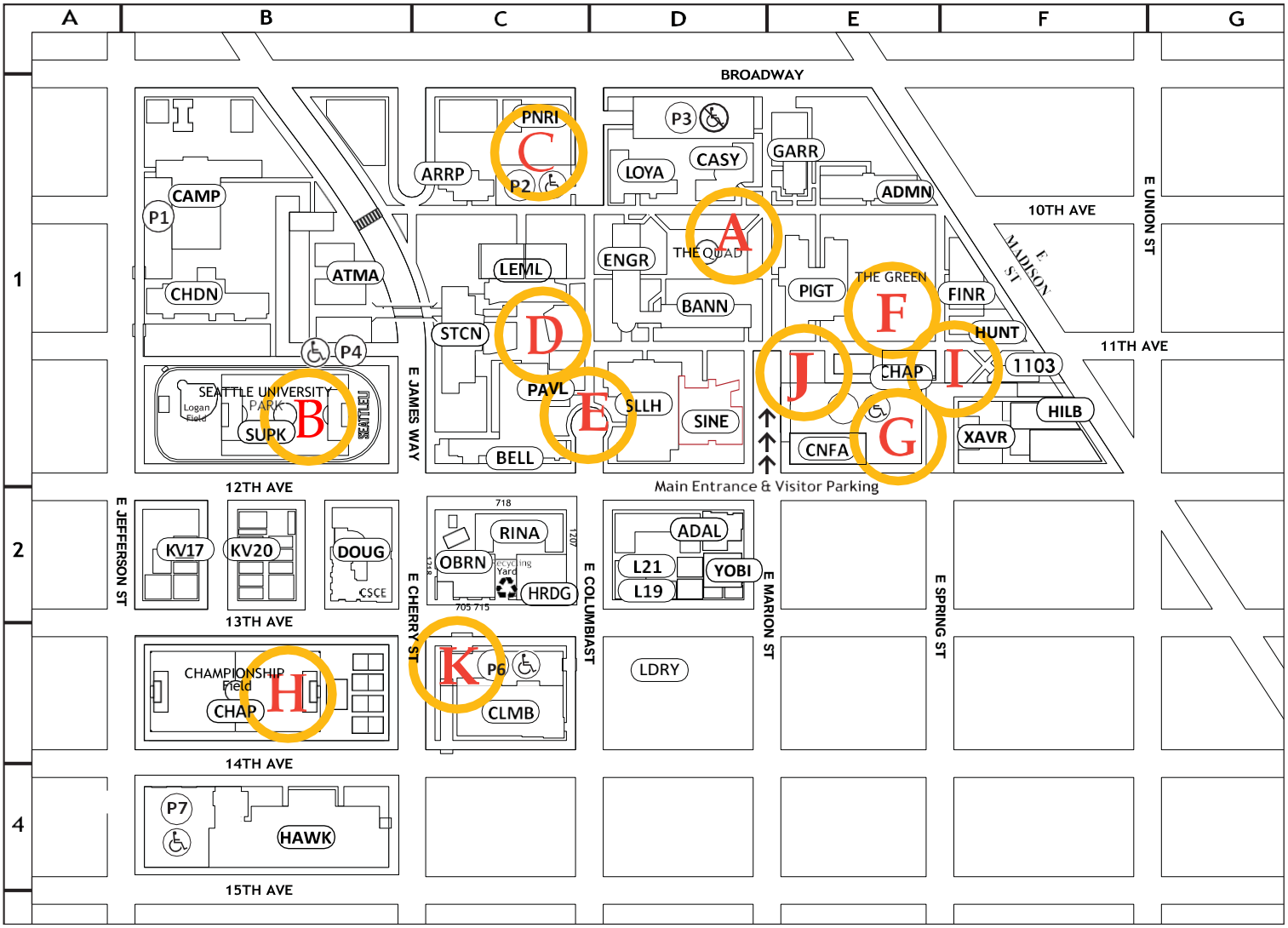
In an evacuation proceed the designated **Evacuation Assembly Area** for your building. Check the large poster at building entrances for a locator map or refer to the map on the back.

1103	I	CHAP	I	HILB	I	OBRC	K
ADAL	J	CHDN	B	HRDG	K	PAVL	E
ADMN	A	CLMB	K	HUNT	F	PIGT	J/F
ARRP	C	CNFA	G	JEFF	H	RINA	K
ATMA	B	DOUG	H	KV17/20	H	SINE	J
BANN	D	ENGR	D	L19/21	K	SLLH	E
BELL	E	FINR	F	LDRY	K	STCN	D
CAMP	B	GARR	A	LEML	C	UNIN	I
CASY	A	HAWK	H	LOYA	A	XAVR	F
						YOBI	F

SEATTLE UNIVERSITY

Emergency Procedures

Evacuation Assembly Areas



1103 E Madison	1103	I	Engineering Building	ENGR	D	Pigott Building	PIGT	A / F
1313 E Columbia Building	CLMB	K	Fine Arts Building	FINR	F	Pigott Pavilion	PAVL	E
Administration Building	ADMN	A	Garrand Building	GARR	A	Redhawk Center	HAWK	H
Advancement & Alumni Building	ADAL	J	Harding Building	HRDG	K	Rianna Building	RINA	K
Arrupe Jesuit Residence	ARRP	C	Hunthausen Hall	HUNT	F	Sinegal Center	SINE	J
Bannan Building	BANN	D	Kolvenbach Residences	KV17/KV20	H	St. Ignatius Chapel	CHAP	I
Bellarmine Hall	BELL	E	Laundry Building	LDRY	K	Student Center	STCN	D
Campion Hall	CAMP	B	Lemieux Library	LEML	C	Sullivan Hall	SLLH	E
Casey Building	CASY	A	Logan Residences	L21/L19	K	Vi Hilbert Hall	HILB	F
Center for Fine Arts	CNFA	G	Loyola Hall	LOYA	A	Xavier Hall	XAVR	F
Chardin Hall	CHDN	B	Murphy Apartments	ATMA	B	Yobi Apartments	YOBI	F
Douglas Apartments	DOUG	H	O'Brien Center	OBRC	K			

15 HAZING PREVENTION AND RESPONSE

Policy Statement

Seattle University is committed to providing for the safety, security, health, and welfare of the entire campus community. The University therefore strictly prohibits hazing in all forms.

Hazing is a dangerous and sometimes even deadly practice that harms and humiliates its victims psychologically and physically, even when victims are willing participants. Additionally, it is prohibited by law and can subject perpetrators to criminal and civil sanctions. Consequently, hazing has no place in the Seattle University community.

This policy applies to all University community members, including all University sponsored organizations and teams and their individual members, coaches, and advisors; academic cohorts; and individual University faculty, staff, volunteers, and contractors.

Definition of Hazing

Hazing includes any act committed as part of a person's recruitment, initiation, pledging, admission into, or affiliation with a student organization, athletic team, or living group, or any pastime or amusement engaged in with respect to such an organization, athletic team, or living group that causes, or is likely to cause, bodily danger or physical harm, or serious psychological or emotional harm, to any student or other person attending a public or private institution of higher education or other postsecondary educational institution, including causing, directing, coercing, or forcing a person to consume any food, liquid, alcohol, drug, or other substance which subjects the person to risk of such harm, regardless of the person's willingness to participate. Hazing does not include customary athletic events or other similar contests or competitions. Hazing activities include but are not limited to the following: abuse of alcohol or drugs during new member activities; striking another person whether by use of any object or one's body; creation of excessive fatigue, isolation, or physical or psychological shock; and morally degrading or humiliating games or activities that create a risk of bodily, emotional, or mental harm.

Reporting Hazing

- General Referral Form (online)
- EthicsPoint: 1-888-393-6824 Online Portal

Primary Contacts:

- Dr. anton ward-zanotto, Dean of Students | 206-296-6060
- Chris Van Liew, Senior Vice President for Strategic Initiatives and Interim Director of Human Resources | vanliew@seattleu.edu
- Department of Public Safety
  - 206-296-5990 (non-emergency)
  - 206-296-5911 (emergency)

Investigation and Response Procedures
The Office of the Dean of Students receives and reviews written complaints alleging hazing violations. Upon initial review, the Dean of Students or designee will assess the complaint, conduct preliminary conversations as needed, request further investigation by appropriate staff, refer to other offices when necessary, or initiate the integrity formation process. All investigations are conducted in accordance with the university's Code of Student Conduct.

Sanctions and Accountability
Students, Faculty and Staff who violate this policy are subject to disciplinary action up to and including dismissal. University-recognized organizations that violate this policy are subject to sanctions including revocation of university recognition, as outlined in the Club Handbook and Student Athlete Handbook.

Prevention and Education
Seattle University implements comprehensive hazing prevention strategies:

- Educational Modules for all students regarding the University's policy prohibiting hazing, and on identifying, preventing, and reporting hazing through the "Voices for Change" system.
- Annual training for all faculty and staff (including contractors and volunteers) regarding the University's policy prohibiting hazing, and on identifying, preventing, and reporting hazing via EngageSU.
- Specialized content for clubs and club advisors.
- New student orientation programming.

All educational training materials are publicized in accordance with state law.

Support Resources
Students, faculty, and staff affected by hazing have access to:

- Counseling and Psychological Services
- Student Health Center
- Victim Advocacy Services
- Academic Support Services
- Employee Assistance Program (for faculty and staff)

Legal Framework
Seattle University's hazing policy aligns with Washington State law (RCW 28B.10, et seq.) and federal requirements. The university cooperates fully with law enforcement investigations when criminal behavior is suspected.

Additional Resources:

- University Hazing Policy Website
- Code of Student Conduct
- HazingPrevention.org
- StopHazing.org

16 ANNUAL DISCLOSURE OF CRIME STATISTICS

DPS is responsible for the compilation of the annual crime statistics. The crime statistics found in Section 17 represent crimes which occurred on the Seattle University campus or within our reporting area during the three- year reporting period (2023, 2024, and 2025). Sources of crime reports and statistics include: reports made directly with DPS by any person, statistical data provided by Seattle Police, qualitative data provided by Seattle Police or found in their incident reports, Campus Security Authority reports, third party reports through other on-campus departments, and statistical data provided by other on-campus departments. All statistics received from outside of DPS are carefully compared with existing DPS reports in order to ensure accurate and complete reporting. In compliance with the Clery Act's implementing regulations, Seattle University made a reasonable, good faith effort to obtain statistics for reportable offenses that occurred on or within the institution's Clery geography for 2025 by requesting statistical data from the Seattle Police Department ("SPD") on 1/23/2026. Although the SPD provided Seattle University with certain statistical data for reportable offenses, it did not provide sufficient information for Seattle University to confirm in time to publish this report whether the reported offenses were within its Clery geography. Therefore, Seattle University has included reportable offense statistics furnished by SPD only where it has independently confirmed through cross-referencing its own data that the offenses identified by SPD were reportable under the Clery Act (i.e., within the University's Clery's geography).

All campus crimes are to be reported to DPS. Means of reporting to campus public safety include:

1. In person at the DPS office, open 24 hours a day and located on campus in the lower level of the Columbia Building (1313 E. Columbia St., Seattle, WA 98122).

2. You may also telephone ext. 5990 for non-emergency calls ((206) 296-5990 off campus), and ext. 5911 for emergencies ((206) 296-5911 off campus). Reporting crimes to DPS will result in the inclusion of those crimes in the annual disclosure of crime statistics. Such reporting may also facilitate the Timely Warning of others on campus should the situation call for notifying others. Any individual who wishes to report a crime on a voluntary, confidential basis for inclusion in the annual disclosure of crime statistics may do so by contacting Public Safety.

3. If you are a Seattle University Campus Security Authority (CSA), you are required to report Clery Act reportable crimes to DPS as soon as possible, even if the crime victim wishes to not report the incident to the University or wishes to remain anonymous, as a campus security authority you are required to report the incident. Use the CSA incident reporting form on the DPS website or call Public Safety directly.

16.1 Campus Security Authorities (CSAs)

The law defines the following categories of Campus Security Authorities (CSAs):

- Public Safety administrators, supervisors, patrol officers, student safety staff, including building support staff and escort staff.

- Non- Public Safety positions or offices responsible for campus security—residence life student assistants, residence hall front desk staff, and Fitness Center front desk staff.

- Officials with significant responsibility for student and campus activities. Some examples of CSAs in this category include but are not limited to: academic deans; student affairs residential life officials; athletic administrators, including directors, assistant directors and coaches; student activities coordinators and staff; student conduct officials; faculty and staff advisors to student organizations; student center building staff; student peer education advisors; new student program orientation advisors, and administrators at branch campuses.

- 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.

Who is Not a CSA? The following non-CSA positions and functions include, but are not limited to:

- Faculty members without responsibility for student and campus activity beyond the classroom

- Physicians/nurses in Student Health who only provide care for students

- Clerical or administrative support staff

- Cafeteria staff

- Facilities maintenance staff

- Information technology staff

- Licensed mental health or pastoral counselors when acting within the scope of their license or certificate

- Roles with like functions listed above

Pastoral and professional counselors are encouraged, if and when the counselor deems appropriate, to inform the person they are counseling of the procedures necessary to report crimes on a voluntary, confidential basis for inclusion in the annual disclosure of crime statistics. DPS administrators are available to assist pastoral and professional counselors, and

victims of a crime, with information regarding second and third person reporting of criminal incidents.

16.2 Clery Act Reportable Offenses

- **Aggravated Assault** - An unlawful attack by one person upon another for the purpose of inflicting severe or aggravated bodily injury. This type of assault usually is accompanied by the use of a weapon or by means likely to produce death or great bodily harm.

- **Arson** - Any willful or malicious burning or attempt to burn, with or without intent to defraud, a dwelling, house, public building, motor vehicle or aircraft, personal property of another, etc.

- **Burglary** - The unlawful entry of a structure to commit a felony or a theft.

- **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 length of the relationship, the type of relationship, and the frequency of interaction between the persons involved in the relationship.

- **Domestic Violence** - A felony or misdemeanor crime of violence committed—
  - by a current or former spouse or intimate partner of the victim;
  - by a person with whom the victim shares a child in common;
  - by a person who is cohabitating with, or has cohabitated with, the victim as a spouse or intimate partner;
  - by a person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction in which the crime of violence occurred; or by any person against an adult or youth victim who is protected from that person's acts under the domestic violence laws of the jurisdiction in which the crime of violence occurred.

- **Drug Abuse Violation** - The violation of laws prohibiting the production, distribution and/or use of certain controlled substances and the equipment or devices utilized in their preparation or use. The unlawful cultivation, manufacture, distribution, sale, purchase, use, possession, transportation or importation of any controlled drug or narcotic substance. Arrests for violations of state and local laws, specifically those relating to the unlawful possession, sale, use, growing, manufacturing and making of narcotic drugs. Note: drug abuse violations are only reported if they resulted in an arrest or a referral for disciplinary action.

- **Fondling** - The touching of the private body parts of another person for the purpose of sexual gratification, without the consent of the victim, including instances where the

victim is incapable of giving consent because of his/her age or because of his/her temporary or permanent mental incapacity.

- **Hate Crime** - A criminal offense that manifests evidence that the victim was intentionally selected because of the perpetrator's bias against the victim. Note: the Clery Act categories of bias that can constitute a hate crime are the victim's actual or perceived: race, religion, gender, gender identity, sexual orientation, ethnicity, national origin, and/or disability. Any Clery Act crime that fits this definition will also be counted as a hate crime. Additionally, the following crimes will be counted only if they fit the definition of a hate crime:

    - **Intimidation -** To unlawfully place another person in reasonable fear of bodily harm through the use of threatening words and/or other conduct, but without displaying a weapon or subjecting the victim to actual physical attack.
    - **Larceny-Theft (Except Motor Vehicle Theft)** - The unlawful taking, carrying, leading, or riding away of property from the possession or constructive possession of another.
    - **Simple Assault** - An unlawful physical attack by one person upon another where neither the offender displays a weapon, nor the victim suffers obvious severe or aggravated bodily injury involving apparent broken bones, loss of teeth, possible internal injury, severe laceration, or loss of consciousness
    - **Destruction Damage Vandalism of Property** - To willfully or maliciously destroy, damage, deface, or otherwise injure real or personal property without the consent of the owner or the person having custody or control of it.

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

- **Liquor Law Violation** - 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. Note: liquor law violations are only reported if they resulted in an arrest or a referral for disciplinary action.

- **Manslaughter by Negligence** - The killing of another person through gross negligence.

- **Motor Vehicle Theft** - The theft or attempted theft of a motor vehicle.

- **Murder and Non-negligent Manslaughter** - The willful (non-negligent) killing of a human being by another.

- **Rape** - The penetration, no matter how slight, of the vagina or anus, with any body part or object, or oral penetration by a sex organ of another person, without the consent of the victim. This offense includes the rape of both males and females.

- **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.

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

- **Stalking** - Engaging in a course of conduct directed at a specific person that would cause a reasonable person to—
    - fear for the person's safety or the safety of others; or
    - suffer substantial emotional stress.

- **Weapons** - The violation of laws or ordinances prohibiting the manufacture, sale, purchase, transportation, possession, concealment, or use of firearms, cutting instruments, explosives, incendiary devices or deadly weapons. This classification encompasses weapons offenses that are regulatory in nature. Note: weapons violations are only reported if they resulted in an arrest or a referral for disciplinary action.

17 CAMPUS CRIME STATISTICS

The University's crime statistics are filed with the Department of Education and then posted on the Department of Education's website. In accordance with the Campus Security Act of 1990, Seattle University publishes and distributes this annual campus security report that is also made available to prospective students and employees as well as the public

You will find Seattle University's most recent stats online at the Department of Education website and at the Public Safety website. Annual reports are completed each September and include Clery Act crime statistics for the prior three calendar years. To receive a hard copy of the Annual Security Report, you can call Public Safety at 206-296-5990.

17.1 First Hill Campus – Clery Crime Statistics

Campus Crime Statistics (First Hill Campus / Seattle)

Criminal Offenses	On Campus			On Campus Student Housing			Public Property			Non-Campus		
	2023	2024	2025	2023	2024	2025	2023	2024	2025	2023	2024	2025
Murder & Non-negligent Manslaughter	0	0	0	0	0	0	0	0	0	0	0	0
Manslaughter by Negligence	0	0	0	0	0	0	0	0	0	0	0	0
Rape	3	0	3	3	0	3	0	1	0	0	0	0
Fondling	2	1	3	2	1	2	0	0	0	0	0	0
Incest	0	0	0	0	0	0	0	0	0	0	0	0
Statutory Rape	0	0	0	0	0	0	0	0	0	0	0	0
Robbery	2	0	0	0	0	0	7	7	1	0	0	0
Aggravated Assault	1	2	2	0	1	1	2	1	2	0	0	0
Burglary	14	27	14	6	4	0	0	0	0	0	0	0
Motor Vehicle Theft	10	15	16	0	0	0	3	7	1	0	0	0
Arson	0	0	0	0	0	0	0	0	0	0	0	0
Hate Crimes	On Campus			On Campus Student Housing			Public Property			Non-Campus		
	2023	2024	2025	2023	2024	2025	2023	2024	2025	2023	2024	2025
Total	0	0	0	0	0	0	0	0	2	0	0	0
VAWA Offenses	On Campus			On Campus Student Housing			Public Property			Non-Campus		
	2023	2024	2025	2023	2024	2025	2023	2024	2025	2023	2024	2025
Domestic Violence	0	2	0	0	1	0	0	1	0	0	0	0
Dating Violence	1	3	2	0	3	2	0	0	0	0	0	0
Stalking	2	7	3	0	4	2	0	0	0	0	0	0
Arrests	On Campus			On Campus Student Housing			Public Property			Non-Campus		
	2023	2024	2025	2023	2024	2025	2023	2024	2025	2023	2024	2025
Weapons Carrying/Possession	0	1	1	0	0	1	0	0	1	0	0	0
Drug Abuse Violations	0	0	1	0	0	0	0	0	0	0	0	0
Liquor Law Violations	0	0	0	0	0	0	0	0	0	0	0	0
Disciplinary Referrals	On Campus			On Campus Student Housing			Public Property			Non-Campus		
	2023	2024	2025	2023	2024	2025	2023	2024	2025	2023	2024	2025
Weapons Carrying/Possession	0	0	0	0	0	0	0	0	0	0	0	0
Drug Abuse Violations	69	32	20	69	30	18	0	0	0	0	0	0
Liquor Law Violations	105	149	109	105	147	106	0	0	0	0	0	0
Unfounded Crimes	On Campus			On Campus Student Housing			Public Property			Non-Campus		
	2023	2024	2025	2023	2024	2025	2023	2024	2025	2023	2024	2025
Total	0	0	0	0	0	0	0	0	0	0	0	0
Hazing Incidents	On Campus			On Campus Student Housing			Public Property			Non-Campus		
	2023	2024	2025	2023	2024	2025	2023	2024	2025	2023	2024	2025
Total	n/a	n/a	0	n/a	n/a	0	n/a	n/a	0	n/a	n/a	0

Detailed Information Regarding Hate Crimes 2023 – 2025

For 2023 the following hate-related crimes were reported in the First Hill Campus reporting area:

- On-Campus
  - 0 incidents
- On-Campus Student Housing
  - 0 incidents
- Public Property
  - 0 incidents
- Non-Campus
  - 0 incidents

For 2024 the following hate-related crimes were reported in the First Hill Campus reporting area:

- On-Campus
  - 0 incidents
- On-Campus Student Housing
  - 0 incidents
- Public Property
  - 0 incidents
- Non-Campus
  - 0 incidents

For 2025 the following hate-related crimes were reported in the First Hill Campus reporting area:

- On-Campus
  - 0 incidents
- On-Campus Student Housing
  - 0 incidents
- Public Property
  - 1 incident of simple assault with race bias
  - 1 incident of destruction/damage/vandalism of property with national origin bias
- Non-Campus
  - 0 incidents

SEATTLE UNIVERSITY CLERY ACT GEOGRAPHY MAP – First Hill

On Campus

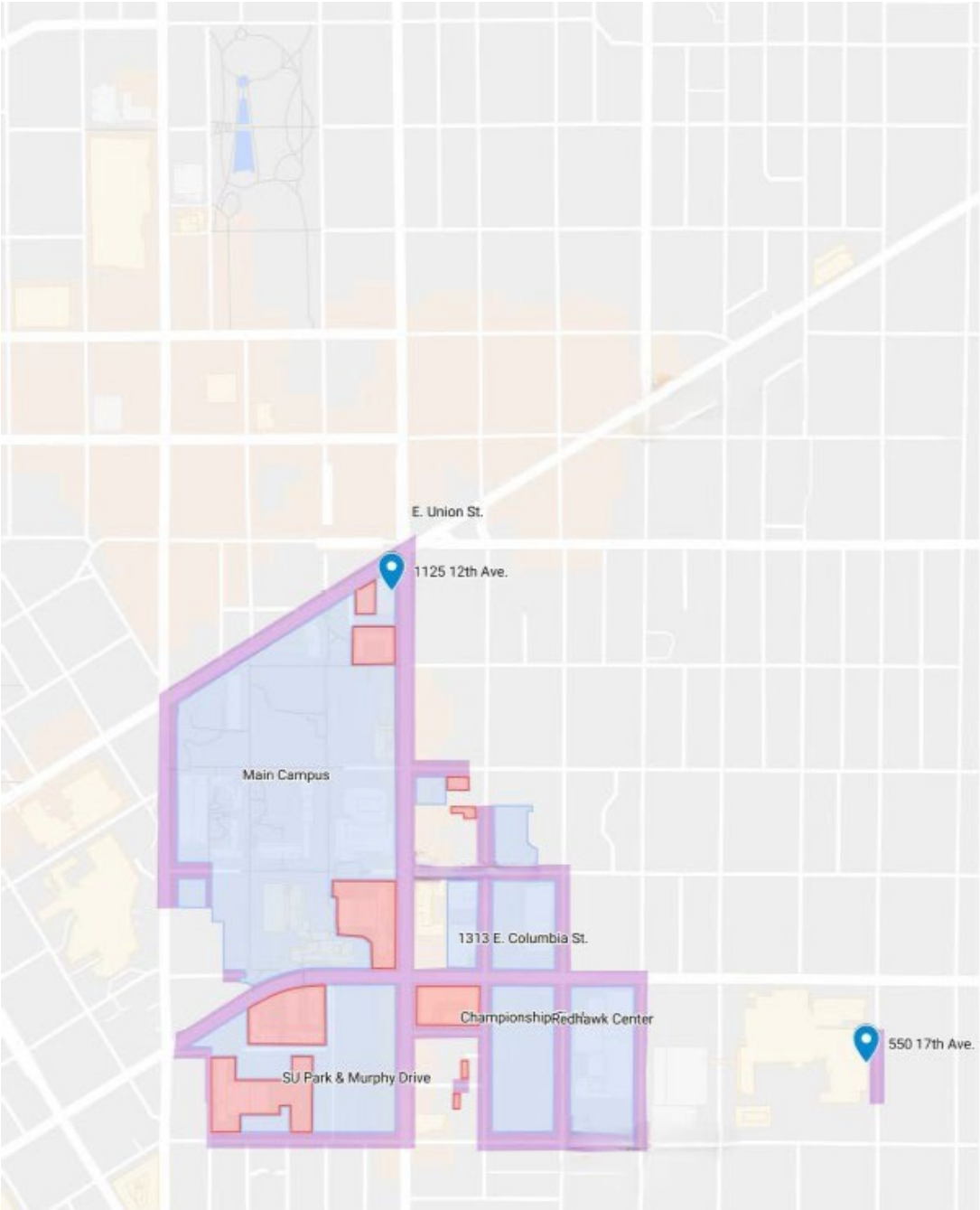
- Main Campus
- Community Garden
- SU Park & Murphy Drive
- Championship Field
- Redhawk Center
- 1313 E. Columbia St.
- 1300 E. Columbia St.
- Harding Building & O'Brien Center
- Admissions and Alumni
- Campion South Lot / Chardin Loading Dock
- 1125 12th Ave.
- 550 17th Ave

Adjacent Public Property

- Public Property

On Campus Residence

- Logan Town Homes
- Douglas
- Bellarmine
- Xavier
- Yobi
- 1220 E. Barclay Ct.
- 1217 E. Barclay Ct.
- Campion and Chardin
- Murphy Apartments (All Buildings)
- Vi Hilbert Hall



17.2 South Lake Union Campus – Clery Crime Statistics

Campus Crime Statistics (South Lake Union Campus / Seattle)												
Criminal Offenses	On Campus			On Campus Student Housing			Public Property			Non-Campus		
	2023	2024	2025	2023	2024	2025	2023	2024	2025	2023	2024	2025
Murder & Non-negligent Manslaughter	0	0	0	0	0	0	0	0	0	0	0	0
Manslaughter by Negligence	0	0	0	0	0	0	0	0	0	0	0	0
Rape	0	0	1	0	0	1	0	0	0	0	0	0
Fondling	2	1	2	0	0	2	0	0	0	0	0	0
Incest	0	0	0	0	0	0	0	0	0	0	0	0
Statutory Rape	0	0	0	0	0	0	0	0	0	0	0	0
Robbery	0	1	0	0	0	0	0	0	1	0	0	0
Aggravated Assault	0	0	0	0	0	0	0	0	0	0	0	0
Burglary	0	2	0	0	0	0	0	0	0	0	0	0
Motor Vehicle Theft	0	1	0	0	0	0	0	2	0	0	0	0
Arson	0	0	0	0	0	0	0	0	0	0	0	0
VAWA Offenses	On Campus			On Campus Student Housing			Public Property			Non-Campus		
	2023	2024	2025	2023	2024	2025	2023	2024	2025	2023	2024	2025
Domestic Violence	0	0	0	0	0	0	0	0	0	0	0	0
Dating Violence	0	0	3	0	0	3	0	0	0	0	0	0
Stalking	0	0	1	0	0	1	0	0	0	0	0	0
Arrests	On Campus			On Campus Student Housing			Public Property			Non-Campus		
	2023	2024	2025	2023	2024	2025	2023	2024	2025	2023	2024	2025
Drug Abuse Violations	0	0	0	0	0	0	0	0	0	0	0	0
Liquor Law Violations	0	0	0	0	0	0	0	0	0	0	0	0
Weapons Carrying/Possession	0	0	0	0	0	0	0	0	0	0	0	0
Disciplinary Referrals	On Campus			On Campus Student Housing			Public Property			Non-Campus		
	2023	2024	2025	2023	2024	2025	2023	2024	2025	2023	2024	2025
Drug Abuse Violations	4	3	2	2	1	1	0	0	0	0	0	0
Liquor Law Violations	2	4	1	2	2	1	0	0	0	0	0	0
Weapons Carrying/Possession	0	0	0	0	0	0	0	0	0	0	0	0
Hate Crimes	On Campus			On Campus Student Housing			Public Property			Non-Campus		
	2023	2024	2025	2023	2024	2025	2023	2024	2025	2023	2024	2025
Total	0	0	0	0	0	0	0	0	0	0	0	0
Unfounded Crimes	On Campus			On Campus Student Housing			Public Property			Non-Campus		
	2023	2024	2025	2023	2024	2025	2023	2024	2025	2023	2024	2025
Total	0	0	0	0	0	0	0	0	0	0	0	0
Hazing Incidents	On Campus			On Campus Student Housing			Public Property			Non-Campus		
	2023	2024	2025	2023	2024	2025	2023	2024	2025	2023	2024	2025
Total	n/a	n/a	0	n/a	n/a	0	n/a	n/a	0	n/a	n/a	0

Detailed Information Regarding Hate Crimes 2023 - 2025

For 2023 the following hate-related crimes were reported in the South Lake Union Campus reporting area:

- On-Campus
  - 0 incidents
- On-Campus Student Housing
  - 0 incidents
- Public Property
  - 0 incidents
- Non-Campus
  - 0 incidents

For 2024 the following hate-related crimes were reported in the South Lake Union Campus reporting area:

- On-Campus
  - 0 incidents
- On-Campus Student Housing
  - 0 incidents
- Public Property
  - 0 incidents
- Non-Campus
  - 0 incidents

For 2025 the following hate-related crimes were reported in the South Lake Union Campus reporting area:

- On-Campus
  - 0 incidents
- On-Campus Student Housing
  - 0 incidents
- Public Property
  - 0 incidents
- Non-Campus
  - 0 incidents

END OF ASFSR 2026