

BROWN UNIVERSITY PUBLIC SAFETY
AND EMERGENCY MANAGEMENT

2025 Annual Security Report and Annual Fire Safety Report



BROWN

Public Safety and Emergency Management provides the community with the resources and the education necessary to make informed choices about their safety. Public Safety personnel participate in a wide range of campus events, including University orientations and resource fairs, in an effort to provide all members of the community with valuable and practical safety information. Please visit the Public Safety and Emergency Management [website](#) for further information pertaining to our programs and services.

Public Safety and Emergency Management

For more information about sexual, relationship and gender-based harm, including time-sensitive medical information and confidential support services, please visit BWell Health Promotion at brown.edu/bwell.

24-HOUR EMERGENCY PHONE NUMBERS

Public Safety and Emergency Management/
Emergency Medical Services
401-863-4111
x4111 On campus

Sexual Assault Response Line:
401-863-6000

Providence Police: 911 or 401-272-3121

Rhode Island Victims of Crime Helpline:
800-494-8100

Administrator on Call: 401-863-4111

Public Safety and Emergency Management:
401-863-4111 or 401-863-3322

Investigations unit: 401-863-1663

**TITLE IX RESOURCES
FOR STUDENTS, FACULTY AND STAFF**

Title IX Office

20 Benevolent Street
Providence RI, 02912
401-863-2026
titleixoffice@brown.edu

**Office of Equity Compliance
and Reporting**

equity_reporting@brown.edu

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Public Safety and Emergency Management is committed to the safety and security of the Brown University campus, including students, faculty, staff and visitors. Our approach to this work is influenced by our commitment to transparency, accountability and working in partnership with the community. It is a responsibility we hold in the highest regard, and it is our pleasure to serve.

A MESSAGE FROM THE VICE PRESIDENT FOR PUBLIC SAFETY AND EMERGENCY MANAGEMENT

The Annual Security Report and Annual Fire Safety Reports are available to all members of the Brown community. These reports contain information on campus security, policies and procedures at Brown University, Clery reportable crime statistics reported to Public Safety and Emergency Management and Providence Police, and Clery reportable fire statistics.

The information in these reports is provided in accordance with the Jeanne Clery Campus Security Pact (Clery Act). It is designed to be a resource and to alert the campus community to the current programs, policies and procedures related to crime awareness and reporting at Brown University. The Annual Security Report includes statistics for the previous three years concerning reported crimes that occurred on campus, on property owned or controlled by Brown University and on public property within or immediately adjacent to and accessible from the campus. The Annual Fire Safety report contains fire statistics for fires that occur in on-campus student housing facilities.

The Clery Act is a federal law that requires colleges and universities across the United States to disclose

timely and annual information about campus crime and security policies. Safety is a shared responsibility, and we encourage all members of the Brown University community to use this report as a guide and to take an active role in maximizing personal safety, both on and off campus. The Clery Act also requires statistics for fires occurring in on-campus student housing facilities.

Public Safety and Emergency Management is committed to providing the highest level of professional police and public safety services and works in partnership with several departments and agencies to ensure and maintain a safe learning and working environment.

This publication is made available on October 1 each year and can also be accessed online. To obtain a copy of this report, please email clery@brown.edu or call 401-863-3103.

Rodney Chatman
Vice President for Public Safety and
Emergency Management

STAFFING, AUTHORITY AND JURISDICTION

Brown University Public Safety and Emergency Management is a fully functioning police department and serves the Brown community 24 hours a day, seven days a week, patrolling the campus to deter crime, develop community relations, and respond to calls for service and assistance. The department's mission emphasizes crime prevention, problem solving and joint officer-community responsibility.

Public Safety consists of over 95 highly trained members. Police and public safety officers are charged with protecting the University community and enforcing University rules and regulations. Police officers are required to attend a state-certified police academy, are licensed as Rhode Island special police officers, and have the authority to make arrests. Public Safety police officers also enforce the laws of the state of Rhode Island and the ordinances of the city of Providence and have police jurisdiction on campus and upon the streets and highways adjacent to the campus.

Brown Public Safety and Emergency Management comprises four main units: Police and Patrol Services, Emergency Management, Finance and Administration, and Advocacy, Engagement and Communications.

Police and Patrol Services, the largest unit, is primarily responsible for crime deterrence, crime investigation, dignitary protection, emergency response and handling routine calls for service. Police and Patrol Services also staffs and operates a 24-hour state-of-the-art Dispatch Communication Center. The center handles all emergency and non-emergency calls for service and dispatches officers via a statewide 800 MHz radio system. Police and Patrol Services includes a community engagement team that coordinates safety and educational programs and provides crime victim support and advocacy.

Emergency Management consists of a director, a fire safety officer, a fire safety specialist and several fire safety inspectors. Emergency Management is responsible for planning, implementing and exercising procedures to provide a safe environment for the Brown campus community. This includes developing policies and procedures, running drills, maintaining departmental business continuity plans, inspecting all buildings, maintaining all fire extinguishers on campus, and investigating fires and hazardous situations. The unit also manages the University's emergency preparedness program, BrownReady, which includes written programs and guidance, emergency communication systems, training and response.



Finance and Administration is responsible for strategic and fiscal planning, recruiting and hiring, and human resources administration.

Advocacy, Engagement and Communications provides advocacy and victim assistance for sensitive crimes, ensuring a supportive and confidential environment for students, staff and faculty. In addition, the unit leads educational initiatives and builds collaborative partnerships to promote campus safety. Advocacy, Engagement and Communications manages all communications related to these efforts, maintaining transparency and informing the public of departmental activities and resources.

Public Safety and Emergency Management is a nationally accredited police department through the [Commission on the Accreditation of Law Enforcement Agencies](#), which administers a rigorous accreditation process whereby law enforcement agencies must adhere to over 480 standards, encompassing industry best practices.

PARTNER LAW ENFORCEMENT AGENCIES

Brown Public Safety and Emergency Management maintains a cooperative relationship with the Rhode Island State Police (RISP) and the local law enforcement agency, Providence Police Department (PPD), with whom Public Safety shares a memorandum of understanding. This cooperation includes participation in a police radio and computer network, training programs, special events coordination, assistance with imminent or active threats to the community, investigation of serious crimes, and patrolling areas and responding to incidents involving criminal activity at the off-campus locations of student organizations or housing that are officially recognized by Brown University. Public Safety personnel meet frequently with PPD to discuss campus crimes and other police intelligence matters. Lastly, the RISP, PPD, U.S. Secret Service and FBI work with University police whenever a domestic, national or international dignitary visits campus.

THE CLERY ACT

The Jeanne Clery Campus Safety Act (Clery Act) requires institutions to:

1. Collect, classify and count crime reports and crime statistics;
2. Issue timely warnings for any Clery Act crime that represents an ongoing threat to the safety of students or employees and emergency notifications upon the confirmation of a significant emergency or dangerous situation involving an immediate threat to the health or safety of students or employees occurring on the campus;
3. Provide educational programs and campaigns to promote the awareness of dating violence, domestic violence, sexual assault and stalking;
4. Have procedures for institutional disciplinary action in cases of dating violence, domestic violence, sexual assault and stalking;
5. Publish an Annual Security Report (ASR);
6. Submit crime statistics to the U.S. Department of Education;
7. Keep a daily crime log of alleged criminal incidents that is open to public inspection;
8. Disclose missing student notification procedures that pertain to students residing in on-campus student housing facilities; and
9. Disclose fire safety information related to on-campus student housing facilities, including keeping a fire log

that is open to public inspection, publishing an Annual Fire Safety Report containing policy statements and fire statistics associated with each on-campus student housing facility, and submitting fire statistics to the U.S. Department of Education.

PREPARING THE ANNUAL SECURITY REPORT

In preparing the annual disclosure of crime statistics, it is Brown Public Safety and Emergency Management policy to collect information reported directly to us and also to formally request information about crimes and disciplinary referrals from campus security authorities (campus officials with significant responsibility for student and campus activities). In addition, Public Safety collects statistics from local law enforcement with jurisdiction for areas within Brown's Clery geography.

Note that police departments are not required to provide statistics; however, documentation is required to show a good faith effort was made.

All statistics are reviewed by Public Safety staff members for accuracy and then forwarded to the Vice President for Public Safety and Emergency Management for final review and approval. Once approved, statistics are submitted electronically to the U.S. Department of Education.

By October 1 of each year, Public Safety and Emergency Management sends an email to the entire Brown University community notifying members that both the Annual Security Report and Annual Fire Safety Report are available to view. This email contains a brief description of the information contained in the reports as well as a direct web link to the report.

DAILY CRIME LOG

The Clery Act requires colleges and universities to have a daily crime log. The purpose of this log is to document any criminal or alleged criminal activity reported to the University and surrounding areas. This log includes incident classification, report number, reported date and time, occurrence date and time, location of incident, and disposition and does not include any identifying information about persons involved in an incident. Beyond the daily crime log itself, it is University practice not to include personally identifying information about victims of crimes in any publicly available records, especially for incidents of dating or domestic violence, sexual assault and/or stalking.

Public Safety and Emergency Management is responsible for maintaining this log for the University and for ensuring that the log is updated within two business days of Public Safety being notified of an incident.

To view the log, please visit the Public Safety and Emergency Management [website](#) or visit Public Safety headquarters at 75 Charlesfield St., Providence, RI during normal business hours (Monday through Friday, 8:30 a.m. to 4:30 p.m.).

Public Safety retains daily crime logs for seven years. Requests for logs that are more than 60 days old will be fulfilled within two business days.

Fire Safety maintains a [separate log](#).

CAMPUS SECURITY AUTHORITIES

A campus security authority (CSA) is a term used in the Clery Act to describe someone who has significant responsibility for student and campus activities. The regulations that govern the Clery Act define a CSA as:

1. A campus police department or a campus security department of an institution; and
2. Any individual or individuals who have responsibility for campus security but who do not constitute a campus police or security department, such as an individual who is responsible for monitoring entrance into institutional property; and
3. 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 offenses; and
4. An official of an institution who has significant responsibility for student and campus activities, including but not limited to student housing, student discipline and campus judicial proceedings ("Official" is defined as any person who has the authority and the duty to take action or respond to particular issues on behalf of the institution.).

Pastoral and Professional Counselors on campus are **not** considered to be CSAs when they are acting in the role of pastoral or professional counselors and are not required to report Clery reportable offenses. Clinical staff in Student Health Services are likewise not CSAs, unless specifically designated. Pastoral and professional counselors and clinical staff in Student Health Services are encouraged to inform persons being counseled/treated of procedures to report crimes on a voluntary, confidential basis to a CSA or to Public Safety and Emergency Management.

Pastoral Counselor: An employee who is recognized by that religious order or denomination as someone who provides confidential counseling and who functions within the scope of that recognition as a pastoral counselor

Professional Counselor: An employee whose official responsibilities include providing psychological counseling to members of the institution's community and who also functions within the scope of their license or certification

REPORTING CRIMINAL OFFENSES

As Brown's law enforcement unit, Public Safety and Emergency Management is designated by the University to receive complaints of criminal offenses. Students and employees of Brown should report crimes to the unit by calling 401-863-3322. Prompt and accurate reporting is important to facilitate improved investigation and the preservation of evidence. If an individual prefers not to report alone, they may bring a friend or go through several support offices on campus. Those who prefer to speak with a non-uniformed Public Safety advocate or a member of the Investigation Unit can call 401-863-1663. Reports may form the basis of criminal charges (violations of state or federal law) and/or University discipline cases. The victim's wishes are always taken into consideration.

Reports of criminal offenses occur off campus may also be filed by complainants directly with the [Providence Police Department](#) (PPD) by visiting a station or by calling 401-272-3121. Complainants wishing to file a criminal report with the PPD may request assistance with these procedures from Brown Public Safety or DPS Law Enforcement advocate or a member of the Investigations unit by calling 401-863-1663. To reach Public Safety's on-duty sergeant call 401-863-1663. Once a criminal report is filed with the PPD, the decision to prosecute felony crimes is made at the discretion of the Rhode Island Attorney General and, for misdemeanor cases, by the PPD. Each agency is also responsible for providing the necessary and appropriate follow-up and communication with the complainant.

Public Safety and Emergency Management provides a variety of support services for the victims of sensitive crimes, including hate crimes, sexual assault, assault, robbery, relationship violence and stalking. Public Safety has a law enforcement advocate who works cooperatively with the Investigations unit, Campus Life, Counseling and Psychological Services, BWell Sexual Harm Acute Response and Empowerment (SHARE) Advocates, and University Human Resources to ensure individuals are knowledgeable about their options for personal and workplace safety planning. Public Safety also provides support for survivors in reporting and communicating with other municipal agencies, including PPD, regarding sensitive crimes and case follow-up. Public Safety also coordinates events and programming to raise awareness about sensitive crimes; offers self-defense and safety programs for students and staff; and can direct individuals to other victim service providers in Rhode Island.

A trained law enforcement advocate (non-police position) is available to provide post-crisis support to persons who report they have been a victim of a crime. Services available include:

- Victim advocacy and support
- Individual and workplace safety planning
- Review of RI victims' rights, legal definitions of crimes and related laws and legislation
- Transportation and accompaniment to local courts for pretrial and restraining order hearings
- Information about available resources and referrals to external agencies servicing victims of crime, and their families, in Rhode Island, Connecticut and Massachusetts
- Explanation of options and procedures for reporting
- Explanation of protective orders and related court procedures
- Intimate partner and stalking awareness sessions

These services are available to students, faculty and staff. Undergraduate, graduate and medical students who would like to receive confidential advocacy services may also make an appointment with a BWell SHARE Advocate by calling 401-863-2794 or emailing bwell@health.brown.edu, or online at brown.edu/bwell. Students can also call the Sexual Assault Response Line at 401-863-6000 for 24/7 urgent help from a confidential crisis counselor after an experience of sexual, relationship or gender-based harm. Individuals who wish to become more informed about any of the aforementioned areas, or would like to develop an individualized plan for safety, are also welcome to make an appointment.

Any individual who has experienced conduct prohibited by the University's Title IX Policy or Sexual Misconduct Policy is welcome to reach out directly to the Title IX and Gender Equity Office (the "Title IX Office") to discuss supportive resources and applicable policies and procedures. Doing so does not initiate a criminal process, which is separate from University processes. Such individuals may or may not decide to engage in criminal processes, whether or not they have reported their experience(s) to the Title IX Office. Individuals have the option to notify law enforcement directly, or be assisted in doing so by campus authorities, upon request. In addition, speaking with the Title IX Office does not, in itself, initiate a formal resolution process under University policy.

The Investigations unit plays an integral role in providing support and case follow-up for crime victims at Brown. Members of this bureau are available to assist a community member with filing a criminal complaint and will provide a full overview of the option prior to moving forward. Please call the Investigations unit at 401-863-1663 for assistance.

SILENT WITNESS REPORTING

Anonymous reporting is available on the Public Safety and Emergency Management website via the [Silent Witness form](#), for nonviolent incidents. This is not an approved method to report crime in progress, as the message is received via email and may not be read immediately. **Violent crimes should be reported immediately by calling 401-863-4111 or x4111 from a campus phone.** If the incident can be verified, it will be included in the statistics that appear in this document. Reports made anonymously do not allow contact with the reporting witness and, therefore, the extent to which the incident can be documented is limited.

MISSING STUDENT NOTIFICATION POLICY

In accordance with the Higher Education Opportunity Act of 2008 (20 U.S.C. § 1092(j)), Brown University has adopted a Missing Student Notification Policy for students who reside in on-campus housing.

Registering a Confidential Contact Person

In addition to registering an emergency contact, the Missing Student Notification Policy provides students residing in on-campus housing with the option to [register](#), confidentially, an individual to be contacted by Brown University in the event the student is determined to be missing by the Brown Public Safety and Emergency Management or local law enforcement. This contact information will be maintained confidentially and will only be accessible to authorized Brown officials, and may not be disclosed outside the University except to law enforcement personnel in furtherance of a missing person investigation or as otherwise provided by law.

Missing Student Notification

Anyone who believes that a student might be missing should immediately report the matter to the Public Safety and Emergency Management (401-863-3322). If it is believed to be an emergency situation, call 401-863-4111 (or x4111 from a campus phone). Public Safety and Emergency Management, in collaboration with other institutional officials and external law enforcement authorities, as appropriate under the circumstances, shall promptly conduct an investigation to determine whether the student is missing. A student shall be deemed missing when the student is absent from the University for more than 24 hours without any known reason. As a part of this process, a student's designated confidential contact may be contacted in furtherance of the investigation of a missing person report. If the Public Safety and Emergency Management or local law enforcement investigation determines that the student is missing, the University will notify the student's confidential contact no-later than 24 hours after the student is determined to be missing. If the missing student is under 18 years of age, and not emancipated, the University will notify the custodial parent or guardian, in addition to the confidential contact, within 24 hours of the determination that the student is missing. The University will also notify the appropriate local law enforcement agency within 24 hours of the determination that the student is missing, unless local law enforcement was the entity that made the determination that the student is missing.

Students Living in Off-Campus Housing

While the Missing Student Notification Policy only applies to students residing in on-campus housing facilities, anyone who believes that a student residing in off-campus housing might be missing should immediately report their concern to the Brown Public Safety and Emergency Management and/or local law enforcement. Students living off-campus should maintain current emergency contact information on file with the University to assist in such an event.

EMERGENCY PREPAREDNESS AND EVACUATION

Brown University has recognized the need to prepare for and to respond to emergency incidents that pose a threat to the health and safety of the Brown community. Upon confirmation that a significant emergency or dangerous situation involving an immediate threat to the health or safety of students or employees is occurring on campus, Brown University will provide immediate notification of the emergency or dangerous situation to the campus community.

BrownAlert System

Brown University has implemented an emergency campus alert system (BrownAlert) that can contact thousands of individuals within minutes if there is an urgent situation or crisis. During critical events, Brown University will use the BrownAlert System to deliver advisories and instructions to students, faculty, staff and others via cell phones, land lines, email and other communication devices. The primary method of communicating these alerts is through text messages and email messages. Message templates have been developed for various emergencies which includes initial messaging and predetermined distribution lists to ensure prompt and effective communication. Brown students, faculty and staff can use their personal cell phone number to enable Brown to reach them in the event of an emergency. Personal cell phone numbers will only be used by authorized personnel for emergencies or official business.

BrownSiren System

We have also installed an Emergency Siren Warning System (BrownSiren) on our main campus. The system consists of three strategically placed sirens that will be used to warn the University community in the event of a life threatening emergency. If a life threatening emergency is identified where a campus wide BrownSiren activation is necessary, the Department of Public Safety and Emergency Management will activate the system. The activation will consist of an alert tone and a voice message regarding the nature of the emergency. Additionally the University will utilize [BrownAlert](#) and the emergency web site to provide further information. Once an emergency has been resolved the BrownSiren and other communication methods will be utilized to inform people that the emergency is over. System tests will be announced in advance. When the system is activated for a test, no action is necessary and there is no need to seek shelter. Brown will publicize its emergency response and evacuation procedures in conjunction with at least one test per calendar year.

In 2024, Brown University performed a test of the BrownAlert and BrownSiren systems on April 16, 2024, and on October 22, 2024.

Any such notification will be provided by the following methods:

Please visit the University's Emergency Communications [website](#) and follow the link under BrownAlert for students, faculty, and staff.

1. **Brown Siren** is designed to alert the Brown community of a life threatening emergency on campus such as a hostile intruder, a large chemical release near campus, or a natural disaster where there is no advance warning.

The siren is intended to be heard while outdoors. If you are indoors when the system is activated, it is not expected that you will hear the siren or the voice message that follows. If the siren system is used in an actual emergency, members of the community would be directed to seek shelter indoors and additional information would be sent through the BrownAlert emergency notification system via email, text messages, and updates on the Brown homepage. The Brown Alert and BrownSiren systems are tested periodically. During the test, no action is necessary and there will be no need to seek shelter. Testing for the Brown Siren test is done at a minimum, bi-annually. Testing may be announced or unannounced. A description of the test, date, time and if the Brown community was notified is documented.

2. In the event of a significant emergency, the University will utilize the website to inform and update the community members about an emergency occurring on campus. If there is a significant emergency on campus the webpage will contain information about the nature of the emergency, steps taken to address the situation, the emergency's current status and a cumulative chronology of BrownAlert information, any necessary instructions for the University community, and resources for further information.

Upon confirmation that a significant emergency, or dangerous situation is occurring on campus, the University will, without delay, and taking into account the safety of the community, determine the content of the notification and initiate its notification systems, unless issuing the notification will, in the professional judgment of the Department of Public Safety and Emergency Management, compromise efforts to assist a victim or to contain, respond to, or otherwise mitigate the emergency.

In general, the process the University will follow to confirm that a significant emergency or dangerous situation exists is the following:

1. Brown University police officers will be dispatched to confirm that an emergency situation exists (depending on the nature of the situation, the Department of Public Safety and Emergency Management may be aided by other University offices to confirm the nature and severity of the emergency, e.g., Department of Environmental Health and Safety, Department of Facilities Management.
2. Assessment of the situation by the Department of Public Safety (in collaboration with other University departments as may be beneficial), appropriate actions to be taken, and activating the alert systems and the content of the messages to be conveyed.

Due to the size of the University and the paramount importance of the safety of the members of the University community, notifications are given to the entire community. The Vice President of Public Safety and Emergency Management or their designee has the responsibility to determine the content of this notification and to active the University's notification systems.

In the event of a significant emergency or threat to the health and safety of area residents the University, through its Department of Public Safety will communicate with the City of Providence and its appropriate offices for the purpose of providing notifications to area residents.

System Testing

To ensure the effectiveness of its emergency preparedness, the University regularly engages the University community about its emergency and evacuation plans. The activities take the form of classroom and online training, no less than annual tabletop or disaster exercises, and no less than annual testing of its emergency notification systems. In addition, emergency evacuation procedures (fire drills) are tested at least four times per

year in all student residence halls. Tests of the emergency response and evacuation procedures may be announced or unannounced. The University will document for each test, a description of the exercise, the date and time, and if it was announced or unannounced.

Tests of the BrownAlert and BrownSiren systems will be announced in advance. When the systems are activated for a test, no action is necessary and there is no need to seek shelter. Brown will publicize its emergency response and evacuation procedures in conjunction with at least one test per calendar year.

In 2024, Brown University performed a test of the BrownAlert and BrownSiren systems on April 16, 2024, and October 22, 2024. The Brown community, neighbor groups, city emergency responders as well as city and state emergency management agencies were notified in advance of the tests.

TIMELY WARNING POLICY

Public Safety and Emergency Management will issue a timely warning for Clery Act crimes that occur in areas within Brown University's Clery Act geography that (a) are reported to a campus security authority and (b) considered by the Vice President for Public Safety and Emergency Management or their designee to represent a serious or continuing threat to students and employees. The timely warning will not disclose the name(s) of the victim(s).

CORPORATION POLICY STATEMENT ON EQUAL OPPORTUNITY AND NONDISCRIMINATION

Brown University provides equal opportunity and prohibits discrimination, harassment and retaliation based upon a person's race, color, religion, sex, age, national or ethnic origin, disability, veteran status, sexual orientation, gender identity, gender expression, or any other characteristic protected under applicable law, in the administration of its policies, programs, and activities. The University recognizes and rewards individuals on the basis of qualifications and performance. The University maintains certain affirmative action programs in compliance with applicable law.

CAMPUS SEX CRIMES PREVENTION ACT

The federal Campus Sex Crimes Prevention Act requires colleges and universities to issue a statement advising the campus community where state law enforcement agency information concerning registered sex offenders may be obtained. The act also requires registered sex offenders to notify appropriate state officials of any institution of higher education in the state at which the offender is employed, carries on a vocation, or is a student.

To comply with the federal Campus Sex Crimes Prevention Act, Brown Public Safety and Emergency Management has established a procedure to advise local communities of where they can find current information about registered sex offenders who may be employed or students at Brown University. The unit also informs the campus community each academic year of where they can find information on registered sex offenders, including visiting the Rhode Island Sex Offender Registry [website](#) or calling the Providence Police Department at 401-272-3121, Rhode Island Parole Board at 401-462-0900 or Rhode Island Sex Offender Communication Notification Unit at 401-462-0905.

TITLE IX POLICIES

Brown University's Title IX Policy and Sexual Misconduct Policy (together, the "Title IX Policies") prohibit sex discrimination — including sexual assault, dating and domestic violence and stalking, which may also constitute crimes — as well as retaliation. While these Title IX Policies may use different standards and definitions than Rhode Island law, sex- and gender-based incidents often overlap with crimes of rape, sexual assault, stalking, dating violence and domestic violence. Individuals who have experienced these or related behaviors are recognized under federal law, specifically Title IX and the Clery Act, which mandates the contents of this report.

Please refer to Appendix A to review the Title IX Policies, which include descriptions of prohibited conduct; designated reporting options and resources, including confidential services; related policies; confidentiality and privacy provisions; potential sanctions; support measures; and related information.

TITLE IX PROCEDURES

Brown University's Title IX Grievance Procedure and Sexual Misconduct Grievance Procedure (together, the "Title IX Procedures") are incorporated within the respective Title IX Policies and describe the processes applied when the Title IX and Gender Equity Office (the "Title IX Office") receives a report of alleged prohibited conduct. The Title IX Procedures provide for prompt, fair and impartial responses to complaints of prohibited conduct, from initial review to final resolution.

Please refer to Appendix B to review the Title IX Procedures, which include descriptions of applicable disciplinary proceedings and standard of evidence; training engaged in by individuals involved in Title IX processes; simultaneous notifications to parties involved in a proceeding; and appeal rights.

In addition to the definitions provided in Appendix A and Appendix C (refer to appendix D for the procedures), the Rhode Island General Laws provide that Domestic Violence (RIGL § 12-29-2) includes, but is not limited to, any of the following crimes when committed by one family or household member against another: (1) Simple assault (§ 11-5-3); (2) Felony assaults (chapter 5 of title 11); (3) Vandalism (§ 11-44-1); (4) Disorderly conduct (§ 11-45-1); (5) Trespass (§ 11-44-26); (6) Kidnapping (§ 11-26-1); (7) Child-snatching (§ 11-26-1.1); (8) Sexual assault (§§ 11-37-2, 11-37-4); (9) Homicide (§§ 11-23-1 and 11-23-3); (10) Violation of the provisions of a protective order entered pursuant to § 15-5-19, chapter 15 of title 15, or chapter 8.1 of title 8 where the respondent has knowledge of the order and the penalty for its violation, or a violation of a no contact order issued pursuant to § 12-29-4; (11) Stalking (chapter 59 of title 11); (12) Refusal to relinquish or to damage or to obstruct a telephone (§ 11-35-14); (13) Burglary and unlawful entry (chapter 8 of title 11); (14) Arson (chapter 4 of title 11); (15) Cyberstalking and cyberharassment (§ 11-52-4.2); (16) Domestic assault by strangulation § 11-5-2.3; and (17) Electronic tracking of motor vehicles (§ 11-69-1). The Rhode Island General Laws do not define "dating violence" or "consent."

UNDERSTANDING BROWN'S RESPONSE TO SEXUAL ASSAULT

Filing a report of sexual assault with Public Safety *does not require an individual to pursue criminal charges against the offender*. As a victim of a crime, an individual should be empowered to make their own decisions and consider all their options. The individual's safety is paramount. Public Safety advocates can advise the reporter of their options and can also preserve evidence while they consider their options. Staff can also advise the individual on safety planning techniques. Meeting with clinical staff in Counseling and Psychological Services (CAPS), clinical staff in Student Health Services, SHARE Advocates in BWell Health Promotion or pastoral counselors in the Office of the Chaplains and Religious Life does not constitute a subsequent notification to the Public Safety and Emergency Management in most cases.

Steps Involved with Student Reporting to Public Safety

1. As a response to a student's report, a University police officer will be dispatched to the student's location to gather preliminary information and render assistance. The Administrator on Call will be notified. Responding staff will offer the student the option to speak with a confidential, on-call counselor; inform them of time-sensitive medical options; help make arrangements for medical care, if required; and assist with other safety measures, such as emergency housing. For students who would not like to connect to an on-call crisis counselor in the moment, follow-up contact from a confidential BWell SHARE Advocate will be offered.



2. The responding officer will offer transportation to the Student Health and Wellness Center or the local hospital in an unmarked vehicle.
3. Public Safety places much emphasis on minimizing the number of officers present during this preliminary interview process. The officer will ask the student to provide details about what occurred, as well as information about the offender to the best of the student's ability, at a pace that they are comfortable with. An advocate can be available to accompany the student during this process.
4. A University detective will be available to assist with any follow-up interviews conducted by the Providence Police Department (PPD) to obtain the details of the incident. You may decline to notify such authorities.
5. The student's identity will be kept as private as possible. Although a **timely warning** about the incident may be circulated, every effort will be made to maintain privacy and to respect the legitimate privacy concerns of all involved individuals.
6. The DPS Detectives Bureau, which includes detectives, will be assigned to the case. All members of the bureau have been trained extensively in the investigation of sexual offenses and the impact of the crime on the victim. They will approach each case in a sensitive manner and will be responsible for conducting any in-depth interviews with the reporting party. A University detective will also notify the PPD Special Victims Unit, as PPD is the prosecuting agency, and facilitate communication with the victim.
7. All reports of sexual assault are handled with a great level of sensitivity and the student may opt out of the process at any point. University response will vary on a case-by-case basis depending on the nature of the report (i.e., if the individual is reporting an assault that occurred several days or weeks prior and they are not in crisis or in need of immediate medical intervention).

Additional reporting resources can be found in Appendix A, section 3.3.

Evidence Gathering

When reporting to Public Safety, a student is not expected to make any critical decisions on the spot. However, the gathering and preserving of any available evidence is critical should the student ever decide to pursue the case criminally. In Rhode Island, there is no statute of limitations for filing criminal charges in first-degree sexual assault cases. As a process of the University's response protocol, potential evidence available at the scene of the crime would be protected and preserved, if applicable. The student has the option to have critical evidence gathered and preserved by undergoing a medical examination kit at most local hospitals up to 96 hours after an assault. The student is advised not to change clothes, shower, bathe, eat or drink before this examination. Evidence collection at a local hospital **does not require or obligate the student** to pursue any course of action. A BWell SHARE Advocate can guide the student through medical care options as well as help them understand which hospital may best suit their needs.

Personal Safety

As a result of the experience, the student may be feeling anxious and/or fearful. It may be difficult to move forward when the student feels unsafe. They may have concerns about stalking or intimidation. If a student does have personal safety concerns, a Public Safety law enforcement advocate is available to create a plan with the student's input, which will outline options to address the student's residential and personal safety concerns. The Public Safety advocate will also provide a list of applicable support offices available at Brown and across Rhode Island and outline the individual's reporting options moving forward. Please call 401-863-2542 for assistance.

Students who need urgent help can call the 24-hour Sexual Assault Response Line at 401-863-6000 to speak with a confidential crisis counselor for students. A BWell SHARE Advocate can also provide follow-up care. As confidential campus advocates, BWell SHARE Advocates can support undergraduate, graduate and medical students who are impacted by sexual harm (including gender-based or relationship violence) that has occurred at any time and can assist with safety planning as well as navigating medical, reporting and support measures. To make an appointment with a BWell SHARE Advocate, call 401-863-2794, email bwell@health.brown.edu or visit brown.edu/bwell.

Public Safety Resources

Investigations unit

401-863-1663

Public Safety detectives are on-call and are responsible for meeting with and interviewing victims and witnesses. Detectives also offer case follow-up and assistance with pursuing criminal charges. If a case requires communication with another police agency, Public Safety detectives will coordinate with external police departments to assist a victim. Detectives receive specialized training in the areas of sexual assault and trauma and domestic violence.

Public Safety Law Enforcement Advocate

401-863-1663

A law enforcement advocate is available to provide victim advocacy and support to individuals who report they have been a victim of a crime. Services available include individual and workplace safety planning, review of victim rights, assistance with obtaining restraining orders, and referrals to external victim service providers as warranted.

About Protective Orders:

There are two types of court-ordered protective orders.

A No Contact Order (NCO) is related to a criminal charge and is issued at the time of an offender's arraignment. An NCO is in effect for the entire length of the criminal case, including through the length of the sentence. It can be dropped only at the request of the victim with the approval of a judge.

Restraining orders (civil) can be sought whether or not there is a criminal case. Restraining orders can be issued when there has been physical or sexual abuse, threats of violence, harassment or stalking that leads someone to fear for their physical safety.

For students at Brown, NCOs are initiated through the Office of Student Conduct and Community Standards and the Title IX and Gender Equity Office. These orders are not to be confused with state-issued protective orders. NCOs are temporary directives issued by these specific campus offices that prohibit communication between or among designated students. NCOs are issued when, in the judgment of a Student Conduct dean, or Title IX Coordinator, there is reason to believe that an order would be in the best interest of all parties and the community for promoting peace and civility. NCOs do not become part of a student's conduct record unless they violate the order as determined by the student conduct procedures. NCOs prohibit all forms of communication between designated students, direct or indirect, written, electronic or through a third party. The duration of an NCO is determined by the issuing office. Students may request to have an NCO lifted after an appropriate sustained period of compliance.

The University maintains as confidential any accommodations or protective measures provided, to the extent that maintaining such confidentiality would not impair the ability of the University to provide the accommodations or protective measures.

For more information about protective orders, please contact the Public Safety Law Enforcement Advocate at 401-863-1663 or the RI Restraining Order Office at 401-458-3372.

Third-Party Advocates

Advocacy is a process of supporting and empowering people to express feelings and concerns; access information and services; and explore choices and options.

A third-party advocate, such as through a nonprofit organization like Day One RI, provide support throughout the healing process, after an individual has experienced trauma. Advocates are available to listen and offer information about resources that place the individual on the path to healing.

Day One Advocate

401-421-4100

27/7 Helpline: 800-494-8100

dayoneri.org

info@dayoneri.org

How to Be an Active Bystander

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

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

Risk Reduction

With no intent to victim blame and recognizing that only abusers are responsible for their abuse, the following are some strategies to reduce one's risk of sexual assault or harassment (taken from Rape, Abuse and Incest National Network, rainn.org):

- **Be aware of your surroundings.** Knowing where you are and who is around may help you to find a way to get out of a bad situation.
- **Try to avoid isolated areas.** It is more difficult to get help if no one is around.
- **Walk with purpose.** Even if you don't know where you are going, act like you do.
- **Trust your instincts.** If a situation or location feels unsafe or uncomfortable, it probably isn't the best place to be.

- **Try not to load yourself down** with packages or bags, as this can make you appear more vulnerable.
- **Make sure your cell phone is with you** and charged and that you have cab money.
- **Don't allow yourself to be isolated** with someone you don't trust or someone you don't know.
- **Avoid putting music headphones in both ears** so that you can be more aware of your surroundings, especially if you are walking alone.
- **When you go to a social gathering, go with a group of friends.** Arrive together, check in with one another throughout the evening, and leave together.
- **Trust your instincts.** If you feel unsafe in any situation, go with your gut. If you see something suspicious, contact law enforcement immediately: 401-863-4111 for Brown Public Safety or 911 to reach local authorities.
- **Don't leave your drink unattended** while talking, dancing, using the restroom or making a phone call. If you have left your drink alone, just get a new one.
- **Don't accept drinks from people you don't know or trust.** If you choose to accept a drink, go with a person to the bar to order it, watch it being poured and carry it yourself. At parties, don't drink from punch bowls or other large, common, open containers.
- **Watch out for your friends, and vice versa.** If a friend seems out of it, is way too intoxicated for the amount of alcohol they've had or is acting out of character, get them to a safe place immediately.
- **If you suspect you or a friend has been drugged, contact law enforcement immediately.**
- **If you need to get out of an uncomfortable or scary situation**
 - **Remember that being in this situation is not your fault.** You did not do anything wrong; it is the person is making you uncomfortable who is to blame.
 - **Be true to yourself.** Don't feel obligated to do anything you don't want to do. "I don't want to" is always a good reason. Do what feels right to you and what you are comfortable with.
 - **Have a code word with your friends or family** so that if you don't feel comfortable you can call them and communicate your discomfort without the person you are with knowing. Your friends or family can then come to get you or make up an excuse for you to leave.
 - **Lie.** If you don't want to hurt the person's feelings it is better to lie and make up a reason to leave than to stay and be uncomfortable, scared or worse. Some excuses you could use are: needing to take care of a friend or family member, not feeling well or having somewhere else that you need to be.
- **Try to think of an escape route.** How would you try to get out of the room? Where are the doors and windows? Are there people around who might be able to help you? Is there an emergency phone nearby?
- **If you and/or the other person have been drinking,** you can say that you would rather wait until you both have your full judgment before doing anything you may regret later.

STUDENT VIOLATIONS OF THE CODE OF STUDENT CONDUCT

Student violations of University nonacademic rules and regulations should be reported by filing an online Campus Incident Complaint Form ([CICF.brown.edu](https://cicf.brown.edu)) with the Office of Student Conduct and Community Standards. Once an incident is reported through a CICF, the matter will proceed in accordance with student conduct procedures

as appropriate. Both the respondent and the complainant will be given the opportunity to have an advisor during a formal Investigative Review, a hearing before the Student Conduct Board, an Administrative Hearing, or a Higher-Level Restorative Conference. Outcomes that may result from a Student Conduct Board Hearing or an Administrative Hearing include no community status assigned, or a community status of probation, suspension or expulsion along with any terms deemed appropriate. Outcomes that may result from an Administrative Review Meeting include no community status assigned, or a community status of probation and any terms deemed appropriate. Outcomes that result from a Letter Resolution include no community status assigned along with any terms deemed appropriate.

Violations of Brown's Code of Student Conduct may or may not constitute a violation of criminal laws, thus the filing of a CICF is not synonymous with the filing of a criminal report with Public Safety. If you believe a criminal act has occurred and you wish to proceed through the Rhode Island criminal courts, you must file a criminal report with Brown Public Safety or PPD.

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

ALCOHOL AND DRUG POLICIES AND DISCLOSURES

In accordance with the Drug-Free Schools and Communities Act of 1989, this Annual Security Report includes the following statements regarding Brown University programs to prevent the unlawful possession, use or distribution of illicit drugs and alcohol by students and employees on its property or as part of any of its activities.

Alcohol Use and Underage Drinking

University [policies](#) prohibit the unlawful possession, use or distribution of alcohol by Brown University students, faculty and staff on its property or as part of any of its activities. Students, faculty and staff are expected to fulfill their obligations and responsibilities pursuant to institutional policy and federal, state and local laws and regulations.

It is unlawful for individuals who have not attained the age of 21 to purchase, possess or consume alcoholic beverages. It is also unlawful to deliver alcoholic beverages to a person under the age of 21, or misrepresent oneself as having attained the age of 21 to procure alcoholic beverages. There are no exceptions to these laws that are applicable to members of the Brown University community.

For Students:

Brown University students are expected to comply with all federal, state and local laws pertaining to alcohol. The illegal possession, use, manufacture, distribution, provision or sale of or possession with the intent to sell alcohol is prohibited by University policies. Students seeking to sponsor activities where alcoholic beverages are to be served must have all required University approvals and abide by established University procedures.

Students violating University policies with respect to alcohol will be disciplined in accordance with Brown University's Code of Student Conduct and a disciplinary action may include the completion of an appropriate rehabilitation program.

A student who is in violation of Brown University's policies on alcohol shall be subject to sanctions in accordance with University policies and procedures. Disciplinary action involving alcohol violations by students may result in the imposition of a range of terms as specified in the Code of Student Conduct, up to and including expulsion.

Any disciplinary action imposed by the University may be in addition to any penalty imposed by an off-campus authority. Students are subject to prosecution under applicable local, state or federal laws.

For Faculty, Staff and Student Employees:

Brown University employees (faculty, staff and student employees) are expected to comply with all federal, state and local laws pertaining to alcohol. All Brown employees are prohibited from unlawful manufacture, distribution, possession or use of alcohol (except as is lawful, and permissible under Rhode Island law and University policies), on the property of Brown University, or as part of any of its activities.

Employees violating University policies with respect to alcohol will be disciplined in accordance with procedures outlined in Brown University's policies and/or the faculty rules and regulations. Additionally, this discipline may include the completion of an appropriate rehabilitation program. Disciplinary action involving alcohol violations by employees will result in disciplinary actions up to and including termination of employment. Any disciplinary action imposed by the University may be in addition to any penalty imposed by an off-campus authority. Employees are subject to prosecution under applicable local, state or federal laws.

With respect to students employed by the University, nothing in Brown policy shall be construed as precluding the University from disciplining students pursuant to the University's Code of Student Conduct/policies, or from taking appropriate action against students pursuant to the University's emergency powers.

Prohibition of Illegal Drugs

In accordance with the federal Drug-Free Schools and Communities Act of 1989, Brown University policies prohibit the unlawful possession, use or distribution of controlled substances/illicit drugs by Brown University students, faculty and staff on its property or as part of any of its activities. Students, faculty and staff are expected to fulfill their obligations and responsibilities pursuant to institutional policy and federal, state and local laws and regulations. Under state and federal law, it is unlawful, except as expressly authorized by law, to manufacture, distribute, dispense, or possess with intent to manufacture, distribute or dispense a controlled substance/illicit drug. More severe criminal sanctions are assessed in instances where a person 18 years of age or older unlawfully distributes a controlled substance/illicit drug to a person under 21 years of age (federal law) or under 18 years of age (state law).

For Students:

Brown University students are expected to comply with all federal, state and local laws pertaining to drugs. The illegal possession, use, distribution, provision, sale or possession with the intent to sell of drugs and/or drug paraphernalia, is prohibited by University regulations on Brown property or as part of any of its activities. Students violating University policies with respect to drugs will be disciplined in accordance with Brown University's Code of Student Conduct and a disciplinary action may include the completion of an appropriate rehabilitation program. A student who is in violation of Brown University's policies on drugs shall be subject to sanctions in accordance with Brown University policies and procedures. Any disciplinary action imposed by the University may be in addition to any penalty imposed by an off-campus authority. Students are subject to prosecution under applicable local, state or federal laws.

For Faculty, Staff and Student Employees:

As a term and condition of employment with Brown University, all employees (faculty, staff and student employees) are prohibited from the unlawful manufacture, dispensing, possession or use of a controlled substance upon the property of Brown University or as part of any of its activities. All employees of the University must abide by the terms of Brown's policy and notify their immediate supervisor and University Human Resources of their conviction for a criminal drug statute violation occurring in the workplace no later than five days after such conviction.

Any violations of Brown's policy by an employee will result in the University taking appropriate personnel action against such an employee, up to and including termination of employment, and/or requiring the employee to participate satisfactorily in an approved drug assistance or rehabilitation program. Any disciplinary action imposed by the University may be in addition to any penalty imposed by an off-campus authority. Employees are subject to prosecution under applicable local, state or federal laws.

With respect to students employed by the University, nothing in Brown's policy shall be construed as precluding the University from disciplining students pursuant to the University's Code of Student Conduct/policies, or from taking appropriate action against students pursuant to the University's emergency powers.

Federal, State and Local Laws and Sanctions

Controlled Substances

Any person who manufactures, delivers, or possesses with the intent to manufacture or deliver a Schedule I or II controlled substance may be imprisoned to a term up to life, and/or fined \$10,000 to \$500,000. For Schedule III or IV controlled substances, such person may be imprisoned for up to twenty (20) years and/or fined up to \$40,000. For Schedule V controlled substances, such person may be imprisoned up to one (1) year and/or fined up to \$10,000. Any person who knowingly or intentionally possesses a Schedule I, II, III, IV, or V controlled substance in the absence of a valid prescription may be imprisoned for up to three (3) years, and/or fined \$500 to \$5,000. R.I.G.L. § 21-28-4.01.

Alcoholic Beverages

Sanctions for misrepresentation of age include (i) a mandatory fine of \$100 to \$500, thirty (30) hours of community service, and suspension of driving privileges for thirty (30) days for the first offense; (ii) a mandatory fine of \$500 to \$750, forty (40) hours of community service, and suspension of driving privileges for three (3) months for the second offense; and (iii) a mandatory fine of \$750 to \$1,000, fifty (50) hours of community service, and suspension of driving privileges for one (1) year for the third and subsequent offenses. R.I.G.L. § 3-8-6.

Sanctions for possession of alcoholic beverages by underage persons include thirty (30) hours of community service, minimum sixty (60) day suspension of driving privileges, and (i) fines of \$150 to \$750 for the first offense, (ii) fines of \$300 to \$750 for the second offense, and (iii) fines of \$450 to \$950 for the third and subsequent offenses. R.I.G.L. § 3-8-10.

Sanctions for furnishing or procuring alcoholic beverages for underage persons include (i) fines of \$350 to \$1,000 and/or imprisonment up to six (6) months for the first offense, (ii) fines of \$750 to \$1,000 and/or imprisonment up to one (1) year for the second offense, and (iii) fines of \$1,000 to \$2,500 and/or imprisonment up to three (3) years for the third or subsequent offenses. R.I.G.L. §§ 3-8-11.1 – 3-8-11.2.

In addition to the examples above, additional criminal penalties for violations of federal, state, and local drug and alcohol laws may be found on websites below. There may be other provisions of federal, state, and local laws related to drugs and alcohol that are not included in this list.

Federal Drug Trafficking Penalties

DRUG/SCHEDULE	QUANTITY	PENALTIES	QUANTITY	PENALTIES
Cocaine (Schedule II)	500–4999 grams mixture	First Offense: Not less than 5 yrs, and not more than 40 yrs. If death or serious injury, not less than 20 or more than life. Fine of not more than \$5 million if an individual, \$25 million if not an individual. Second Offense: Not less than 10 yrs, and not more than life. If death or serious injury, life imprisonment. Fine of not more than \$8 million if an individual, \$50 million if not an individual.	5 kgs or more mixture	First Offense: Not less than 10 yrs, and not more than life.
Cocaine Base (Schedule II)	28–279 grams mixture		280 grams or more mixture	If death or serious injury, not less than 20 or more than life.
Fentanyl (Schedule II)	40–399 grams mixture		400 grams or more mixture	Fine of not more than \$10 million if an individual, \$50 million if not an individual.
Fentanyl Analogue (Schedule I)	10–99 grams mixture		100 grams or more mixture	Second Offense: Not less than 15 yrs, and not more than life. If death or serious injury, life imprisonment. Fine of not more than \$20 million if an individual, \$75 million if not an individual.
Heroin (Schedule I)	100–999 grams mixture		1 kg or more mixture	
LSD (Schedule I)	1–9 grams mixture		10 grams or more mixture	
Methamphetamine (Schedule II)	5–49 grams pure or 50–499 grams mixture		50 grams or more pure or 500 grams or more mixture	2 or More Prior Offenses: Not less than 25 years. Fine of not more than \$20 million if an individual, \$75 million if not an individual.
PCP (Schedule II)	10–99 grams pure or 100–999 grams mixture		100 gm or more pure or 1 kg or more mixture	

PENALTIES		
Other Schedule I and II drugs (and any drug product containing Gamma Hydroxybutyric Acid) Flunitrazepam (Schedule IV)	Any amount 1 gram	First Offense: Not more than 20 yrs. If death or serious injury, not less than 20 yrs, or more than life. Fine \$1 million if an individual, \$5 million if not an individual. Second Offense: Not more than 30 yrs. If death or serious bodily injury, life imprisonment. Fine \$2 million if an individual, \$10 million if not an individual
Other Schedule III drugs	Any amount	First Offense: Not more than 10 years. If death or serious injury, not more than 15 yrs. Fine not more than \$500,000 if an individual, \$2.5 million if not an individual. Second Offense: Not more than 20 yrs. If death or serious injury, not more than 30 yrs. Fine not more than \$1 million if an individual, \$5 million if not an individual.
All other Schedule IV drugs	Any amount	First Offense: Not more than 5 yrs. Fine not more than \$250,000 if an individual, \$1 million if not an individual. Second Offense: Not more than 10 yrs. Fine not more than \$500,000 if an individual, \$2 million if other than an individual.
Flunitrazepam (Schedule IV)	Other than 1 gram or more	
Heroin (Schedule I)	Any amount	First Offense: Not more than 1 yr. Fine not more than \$100,000 if an individual, \$250,000 if not an individual. Second Offense: Not more than 4 yrs. Fine not more than \$200,000 if an individual, \$500,000 if not an individual.

Federal Trafficking Penalties: Marijuana

DRUG	QUANTITY	1st OFFENSE	2nd OFFENSE *
Marijuana (Schedule I)	1,000 kg or more marijuana mixture; or 1,000 or more marijuana plants	Not less than 10 yrs. or more than life. If death or serious bodily injury, not less than 20 yrs., or more than life. Fine not more than life. Fine not more than \$10 million if an individual, \$50 million if other than an individual.	Not less than 15 yrs. or more than life. If death or serious bodily injury, life imprisonment. Fine not more than \$20 million if an individual, \$75 million if other than an individual.
Marijuana (Schedule I)	100 kg to 999 kg marijuana mixture; or 100 to 999 marijuana plants	Not less than 5 yrs. or more than 40 yrs. If death or serious bodily injury, not less than 20 yrs., or more than life. Fine not more than life. Fine not more than \$5 million if an individual, \$25 million if other than an individual.	Not less than 10 yrs. or more than life. If death or serious bodily injury, life imprisonment. Fine not more than \$8 million if an individual, \$50 million if other than an individual.
Marijuana (Schedule I)	More than 10 kgs hashish; 50 to 99 kg marijuana mixture More than 1 kg of hashish oil; 50 to 99 marijuana plants	Not less than 20 yrs. If death or serious bodily injury, not less than 20 yrs., or more than life. Fine \$1 million if an individual, \$5 million if other than an individual.	Not less than 30 yrs. If death or serious bodily injury, life imprisonment. Fine \$2 million if an individual, \$10 million if other than an individual.
Marijuana (Schedule I)	Less than 50 kg marijuana (except 50 or more marijuana plants regardless of weight); 1 to 49 marijuana plants	Not more than 5 yrs. Fine not more than \$250,000, \$1 million if other than an individual	Not more than 10 yrs. Fine \$500,000 if an individual, \$2 million if other than individual
Hashish (Schedule I)	10 kg or less	Not more than 5 yrs. Fine not more than \$250,000, \$1 million if other than an individual.	Not more than 10 yrs. Fine \$500,000 if an individual, \$2 million if other than individual
Hashish Oil (Schedule I)	1 kg or less	Not more than 5 yrs. Fine not more than \$250,000, \$1 million if other than an individual.	Not more than 10 yrs. Fine \$500,000 if an individual, \$2 million if other than individual

*The minimum sentence for a violation after two or more prior convictions for a felony drug offense have become final is not less than 25 years imprisonment and a fine of up to \$20 million if an individual and \$75 million if other than an individual.

Penalties for Violations of Rhode Island's Drug and Alcohol Laws

rilin.state.ri.us/Statutes/TITLE3/INDEX.HTM (alcoholic beverages);
rilin.state.ri.us/Statutes/TITLE11/INDEX.HTM (criminal offenses);
rilin.state.ri.us/Statutes/TITLE21/INDEX.HTM (food and drugs);
and rilin.state.ri.us/Statutes/TITLE31/INDEX.HTM (motor and other vehicles).

Penalties for Violations of the City of Providence's Drug and Alcohol Ordinances

municode.com/resources/gateway.asp?pid=11458&sid=39

Health Risks Associated with Alcohol and Drug Use

From the National Institute on Alcohol Abuse and Alcoholism:

niaaa.nih.gov/alcohols-effects-health/alcohols-effects-body

Drinking too much — on a single occasion or over time — can take a serious toll on your health. Here's how alcohol can affect your body:

Brain: Alcohol interferes with the brain's communication pathways and can affect the way the brain looks and works. These disruptions can change mood and behavior and make it harder to think clearly and move with coordination.



Heart: Drinking a lot over a long time or too much on a single occasion can damage the heart, causing problems including:

- Cardiomyopathy — Stretching and drooping of heart muscle
- Arrhythmias — Irregular heart beat
- Stroke
- High blood pressure

Liver: Heavy drinking takes a toll on the liver and can lead to a variety of problems and liver inflammations including:

- Steatosis, or fatty liver
- Alcoholic hepatitis
- Fibrosis
- Cirrhosis

Pancreas: Alcohol causes the pancreas to produce toxic substances that can eventually lead to pancreatitis, a dangerous inflammation and swelling of the blood vessels in the pancreas that prevents proper digestion.

Cancer: According to the National Cancer Institute: “There is a strong scientific consensus that alcohol drinking can cause several types of cancer. In its Report on Carcinogens, the National Toxicology Program of the U.S. Department of Health and Human Services lists consumption of alcoholic beverages as a known human carcinogen.

The evidence indicates that the more alcohol a person drinks — particularly the more alcohol a person drinks regularly over time — the higher their risk of developing an alcohol-associated cancer. Even those who have no more than one drink per day and binge drinkers (those who consume four or more drinks for women and five or more drinks for men in one sitting) have a modestly increased risk of some cancers. Based on data from 2009, an estimated 3.5% of cancer deaths in the United States (about 19,500 deaths) were alcohol related.”

For more information regarding specific types of cancer, please visit the National Cancer Institute page “Alcohol and Cancer” at cancer.gov/about-cancer/causes-prevention/risk/alcohol/alcohol-fact-sheet (page was last reviewed on May 2, 2025).

Immune System: Drinking too much can weaken your immune system, making your body a much easier target for disease. People who drink chronically are more liable to contract diseases like pneumonia and tuberculosis than people who do not drink too much. Drinking a lot on a single occasion slows your body’s ability to ward off infections — even up to 24 hours after getting drunk.

From the National Institute on Drug Abuse:

Many drugs can alter a person’s thinking and judgment, and can lead to health risks, including addiction, drugged driving, infectious disease, and adverse effects on pregnancy. Information on commonly used drugs with the potential for misuse or addiction can be found here: drugabuse.gov/drug-topics/commonly-used-drugs-charts

On-Campus Resources for Alcohol and Other Drugs

For Students:

Brown University is committed to the maintenance of a campus environment that supports all students in achieving their academic goals. To that end, the University dedicates resources to support students in recovery

from addiction. The following services are available to all Brown students for individual care related to substance use or abuse:

BWell Health Promotion | 401-863-2794

Meet with a staff member for a confidential appointment to explore your relationship with substances and collaborate on developing a schema about the effects of substance use. These conversations can be a powerful tool in helping to make informed decisions, reduce harm, prevent relapse or connect with additional resources. Call or request an appointment online at brown.edu/bwell.

Brown Emergency Medical Services (EMS) | 401-863-4111

Counseling and Psychological Services (CAPS) | 401-863-3476

Provides treatment for a range of psychological concerns, including drug and alcohol use issues, in a confidential setting, and a goal-focused, collaborative framework

The Dean for Recovery and Substance-Free Student Initiatives

The Dean for Recovery and Substance-Free Student Initiatives hosts the Early Recovery Group for students who are committed to abstinence.

Student Health Services | 401-863-3953

Confidential health care for Brown students is available at the Student Health and Wellness Center, 450 Brook St.



Nursing Services | 401-863-1330

Nurses are available for phone consultation during business hours.

Student Support Deans | 401-863-3145

Student Support Deans can help students who encounter a wide range of issues, connecting them to resources that fit their situation and serving as a sounding board to explore options and develop plans to help them manage the issue and its impact on their time at Brown.

Campus Life Advisory Board

The Campus Life Advisory Board for Alcohol and Other Drugs collaborates to oversee best practices within a comprehensive ecological framework to address alcohol and other drug use at Brown. Below is an overview of the programming offered, which is in addition to the individual appointments available to all students.

Pre-arrival

Students complete two online courses before they arrive at Brown. The courses introduce students to the global concepts of consent, sexual violence prevention, and health and safety and substance use.



Orientation

The Culture of Consent and Community Care class meeting is held a day or two after students arrive on campus. Through personal narratives and a series of videos, returning students orient the incoming class to Brown's commitments and values and the expectations of them as the newest members of Brown's community. Community meetings are held a day or two after the class meeting in Bruno Leader communities. The small-group meetings build students' skills — around consent, bystander intervention and support for survivors — for application in their residential communities, friend groups and intimate relationships.

Ongoing

- BWell Health Promotion uses population-based health behavior interventions that empower students with information and access to pro-health skills through in-person and social media outreach as well as curriculum-based workshops.
- Public health messaging, including alcohol education and information on campus resources, is distributed regularly throughout campus via print and social media, with a focus on residence halls and program houses.
- Educational, evidence-based workshops covering alcohol physiology led by a BWell facilitator are conducted throughout the year within community settings on campus.

For Faculty and Staff:

The following services are available to Brown faculty and staff related to substance use or abuse:

Brown University Employee Assistance Program

Sometimes personal problems arise and you need to seek outside professional advice, but you are not sure where to turn. Employee Assistance Program (EAP) is a benefit that is designed to help employees and their families handle personal problems. This program provides confidential problem assessment and, in many cases, referral for a specific course of treatment. To access the program directly, employees or their immediate family members may call 1-855-629-0554 or email careteam@springhealth.com and indicate that they are covered by the Brown contract.

Local and National Resources for Alcohol and Other Drugs

The following local and national resources are available to everyone, including students, faculty and staff:

[Alcoholics Anonymous](#) | 401-438-8860

Anonymous 12-step recovery program

[Butler Hospital](#) | 800-433-6888 (inside RI) or 800-272-9699 (outside RI)

When you or someone you know is ready to commit or re-commit to recovery, the patient assessment team at Butler can assist in finding the right program.

[Narcotics Anonymous](#) | 866-624-3578

Anonymous 12-step recovery program that focuses on the disease of addiction rather than any particular drug

[RI Department of Behavioral Health Care, Developmental Disabilities and Hospitals](#)

The BHDDH website offers a listing of licensed substance use treatment agencies throughout Rhode Island. The list includes agencies licensed to provide detox, residential, outpatient and medication-assisted treatment services.

RI Recovery Support Line | 401-942-STOP (7867)

This support line connects people to treatment and recovery services 24 hours/day, seven days/week, 365 days/year.

SAMHSA's National Helpline | 800-662-HELP (4357), TTY: 800_487-4889

This helpline managed by the Substance Abuse and Mental Health Services Administration (SAMHSA) provides 24-hour, free and confidential treatment referral and information about mental and/or substance use disorders, prevention and recovery, in English and Spanish.

[ZenCare](#)

This website allows you to review local (Providence and Boston area) therapists. You can filter options by selecting alcohol, substance use or recovery focuses. You can also filter by insurance accepted and schedule a phone consultation to see if it is a right fit.

PERSONAL SAFETY AND CRIME PREVENTION PROGRAMS

The Advocacy, Engagement, and Communications Team is responsible for coordinating programming, communications, outreach events and other informational sessions as it relates to the safety and security of the Brown community. The team also monitors crime trends nationwide and locally and will gear programming accordingly. Team members participate in University orientation programs, give presentations to residential units, distribute a monthly newsletter, offer personal and workplace safety sessions and keep the community informed about recent crime trends through social media, morning mail, campus postings and tailored safety sessions. Public Safety representatives also participate as requested by University students, staff and faculty in numerous events throughout the academic year. Public Safety also manages community policing initiatives that facilitate interaction between Public Safety officers and various members of the community and are geared toward safety and problem solving. For information about community policing initiatives, visit the [Public Safety and Emergency Management website](#) or contact the Program Coordinator at 401-863-9043.

Public Safety and Emergency Management offers programs to inform and encourage students and employees to be knowledgeable and proactive about safety procedures and practices, risk reduction strategies, crime awareness and the security of the Brown campus. Full-time crime prevention and community policing staff members are available to facilitate presentations and discussions to groups of any size. A comprehensive list of programs is provided on the Public Safety and Emergency Management website and listed below. The website also contains a calendar of events, weekly incident summary, safety tips and videos, support phone numbers, a daily crime log and an up-to-date crime map.

Information on the crime map is compiled from the Public Safety incident reports. These summary reports do not include general service, medical assist or alarm calls. The previous months' maps are also listed. Please note, the daily crime log can also be viewed on DPS' website or during normal business hours at Public Safety and Emergency Management headquarters, 75 Charlesfield St.

Operation ID: Operation Identification is a nationally recognized property identification program open to all members of the Brown University community. As a crime prevention program, its goal is to deter the thefts and aid in the recovery of stolen property. This is accomplished by applying decals to mark valuable property and tracking important identifying information about such property. Marked items are difficult for a thief to resell, and these items can be traced to the rightful owner. Laptops, tablets, cell phones, bikes and other items of value may be registered with Public Safety. A numbered decal will be applied to each item for easy identification. To make an appointment to have your items registered, please contact Crime Prevention at 401-863-1663 and 401-863-9637 during normal business hours.

U-Lock or U-Lose Bike Registration and U-Lock Upgrade: This campaign was developed in response to a bicycle theft crime trend on campus. Crime data and analysis show that a contributing factor to thefts is stolen bikes being locked with a cable lock or not locked at all. The U-Lock or U-Lose program is designed to inform community members about the crime trend, get members to register their bikes and upgrade their cable lock to a new U-Lock. U-Locks are available on a first-come, first-served basis to all Brown students.

Safewalk: Safewalk was formed at Brown in 1988 in response to women's safety concerns on campus and has since been expanded to include for all members of the community. Safewalk is staffed by student employees who provide point-to-point walking escorts for fellow community members. Each two-person team patrols the campus, along the Brown OnCall Shuttle route, acting as additional "eyes and ears" for community safety. Safewalk stations a team at the Rockefeller Library and the Watson Center for Information Technology, to accommodate those who study late. The teams can be identified by their distinctive Safewalk vests with reflective strips, and photo IDs. Each team is equipped with a two-way portable radio to communicate to University police dispatch at any time. If you see a Safewalk team on campus, feel free to ask them to walk with you if you are feeling unsafe. Safewalk operates during the academic year, on weekdays from 9 p.m. to 2:15 a.m. and on weekends from 10:15 p.m. to 2:15 a.m. Call 401-863-1079 to request service.

Public Safety 101 (formally DPS 101): This course provides an introductory overview of various aspects of public safety, including the roles and responsibilities of our personnel, daily functions, safety strategies and resources offered to the community.

Bystander Intervention Course: This course focuses on empowering individuals to safely and effectively intervene in situations where they witness harmful or potentially harmful behavior. It teaches strategies for recognizing problematic situations (like harassment, bullying or escalating conflict) and provides tools for de-escalation, direct intervention, seeking help or distracting from the situation, all while prioritizing personal safety.

Situational Awareness Course: This course trains individuals to observe and understand their environment to identify potential threats or risks. It covers topics such as recognizing suspicious behavior, understanding patterns, assessing environments for exits and potential dangers, and using all senses to gather information. The goal is to improve decision-making and responses in various situations by being more attuned to surroundings.

Assertiveness Course: This course helps individuals develop the communication skills to express their thoughts,

feelings and needs clearly and respectfully, without being aggressive or passive. It teaches techniques for setting boundaries, saying “no,” expressing opinions and advocating for oneself or others effectively in various personal and professional contexts.

Self-Defense Course: This course provides practical techniques and strategies for physically defending oneself against an attacker. It covers an understanding of crime and violence, situational awareness and basic strikes and maneuvers.

Public Safety Academy: This program offers community members an in-depth, behind-the-scenes look at the daily operations, training and various functions of the University police department. Participants learn about topics such as patrol procedures, firearms and use of force, crime scene investigation and community engagement. The aim is to foster greater understanding and build stronger relationships between law enforcement and the community.

Brown Building Security Initiative (BBSI): BBSI is a campus security program that seeks to promote voluntary efforts to enhance workplace security by developing and maintaining collaborative partnerships with various academic and nonacademic department chairs in order to enhance the security of University buildings and address possible factors that may compromise the safety of the Brown community and Brown facilities.

BBSI objectives include:

- To assess the of the security of academic departments and physical spaces;
- To offer a mechanism to efficiently address issues that may potentially compromise the security of University facilities;
- To develop and enhance partnerships within the community and further advance community policing and crime prevention efforts into various academic and nonacademic spaces across campus; and
- To streamline communications with staff and faculty about safety awareness and security issues.

Public Safety and Emergency Management firmly believes that success in achieving greater safety and security on campus is dependent upon the involvement and active participation of many individuals and departments.

Public Safety and Emergency Management also offers general BBSI information sessions for staff and faculty, as well as for academic and administrative departments. General information sessions provide an overview of the program’s objectives, introduce participants to the general concepts of hostile intruder awareness and provide guidelines for how individuals can play an active role in enhancing building security at Brown. Department sessions are typically offered following the completion of a security assessment.

If you would like to discuss a security assessment for your department/building, please call 401-863-9593 for additional information.

Listening Session Initiative for Students: Public Safety and Emergency Management offers informal opportunities for an intimate conversation with department leadership. The intent is to be fully present and to listen: no cameras, no media, no agenda. Within the listening session format, students are encouraged to share thoughts and recommendations regarding matters that have the potential to impact police-community relations and campus safety programming on Brown’s campus. Public Safety staff members strive to take an active role in discussions and programming that promote partnerships, understanding and trust with the community at Brown. While this work can be challenging, it is vital to building community relationships. Students also have the opportunity to learn about the department’s Diversity and Inclusion Action Plan and to provide feedback. Student organizations and groups are encouraged to take full advantage of this unique opportunity. Small group discussions are preferred.

For more information or to schedule a session for your student constituency, please call, 401-863-2542.

Transaction Safe Space: Public Safety welcomes Brown students and staff to utilize the front lobby for processing exchanges from online transactions. There is a phone in the lobby that auto-dials to the Public Safety's Communication Center in case of an emergency.

Personal Safety Alarms (PAL): Any student, faculty or staff member may obtain a PAL device to carry and use for alerting individuals nearby that they are in danger. The personal alarm can be carried in a purse or pocket or attached to a keychain. It can be used in an emergency situation to call for help, draw attention to an unsafe situation or scare off an attacker.

For your free alarm, please email: campus_safety@brown.edu or call 401-863-9593.

Brown Guardian: Brown Guardian is a mobile app, contracted by the University through Rave Mobile Safety, that enhances personal safety on campus. It is available for free to all students, staff and faculty. It can be downloaded as Rave Guardian by Rave Mobile Safety from Google Play or iTunes or by navigating to getrave.com/forwardToGuardianAppStore.do from your phone's browser.

The Brown Guardian app includes the following features:

- A Call Directory with quick call options for the 24-hour Sexual Assault Response Line and Counseling and Psychological Services (CAPS)
- A University Resources button with direct links to important campus resources
- Instant location sharing and streaming option, even while in anonymous mode
- An enhanced two-way text option allowing users to send anonymous tips to Public Safety
- A content portal that may be populated with University campus safety information

Important note: This service does not replace the standard practice of dialing 401-863-4111 or 3-4111 from any campus phone to report campus-based police, fire or medical emergencies to the Public Safety.

Safety-Related Workshops: Public Safety and Emergency Management provides the community with the resources and education necessary to make informed choices about their safety. Department Personnel participate in a wide range of campus events, including University orientations, resource fairs and Community Coordinators trainings. This information is also imparted through workshops geared toward relevant national awareness and emergency campaigns. Programs offered include:

- Cyberstalking
- Stalking Awareness
- Identity Fraud
- Stop the Bleed, Save a Life
- Emergency Preparedness Training table-top exercises
- Run, Hide, Fight

Be Safe Brown! and National Night Out are two annual campus and community safety resource campaigns featuring a wide range of offices and resources that promote campus, personal, environmental and public safety. “Be Safe Brown!” is offered annually in October to kick off Crime Prevention Month activities. “National Night Out” is an annual community-building campaign that promotes police-community partnerships and neighborhood camaraderie to make neighborhoods safer, more caring places to live. This family-friendly night of entertainment is held in August and is free and open to the public.

PRIMARY PREVENTION AND AWARENESS PROGRAMS FOR ALL INCOMING STUDENTS

According to the American College Health Association, sexual violence prevention programs on college campuses should take a holistic approach, incorporating all levels of the socioecological system. At Brown, BWell Health Promotion uses a public health framework to provide orientation programming on both the individual and community levels.

BWell’s Orientation program, Culture of Consent and Community Care, provides multiple opportunities for students to engage with each component building upon the previous interventions and interactions. This scaffolding approach allows students to interact with the material as they are ready and develop knowledge and skills over time.

The BWell Orientation program is designed with the following core principles:

1. Based on research and informed by best practices in the field of health promotion to maximize the potential for students to gain knowledge, shift attitudes and change behaviors
2. Recognizes social justice and the social determinants of health as foundational to individual and community well-being
3. Honors students’ lived experiences, empowering them to change Brown for the better

Online Courses

Students complete the first part of two online courses before they arrive at Brown: AlcoholEdu and RespectEdu. The courses introduce students to the global concepts of consent, sexual violence prevention, health and safety, and substance use. About 30 days after students arrive on campus, they are invited to complete the second part of each course.

AlcoholEdu Course Objectives

After taking this online course, first-year students will be able to:

- Recognize the impact of relationships and choices on personal goals and overall health
- Develop self-reflection skills through journaling
- Recognize how personal choices align with values and goals
- Define and understand the multiple dimensions of well-being
- Describe alcohol and its basic biological effects on the body, including:
 - Blood alcohol content (BAC) levels and measurement
 - Standard drink measurements

- Long-term health impacts
- Identify warning signs of problematic alcohol use
- Develop strategies for maintaining healthy boundaries
- Identify support resources and strategies for maintaining sobriety (e.g., Recovery Path)
- Recognize signs of unhealthy stress and anxiety
- Identify healthy coping mechanisms for stress management
- Access appropriate campus and community support resources
- Identify when and how to access appropriate campus and community support resources
- Recognize the importance of support systems in managing stress and substance use
- Recognize signs of social isolation and its impact on well-being
- Identify healthy alternatives to using alcohol for social connection
- Understand the relationship between identity and social choices
- Create personal strategies for maintaining social well-being
- Identify signs of substance misuse and alcohol overdose
- Apply the five Ds of bystander intervention in various situations
- Acknowledge the legal implications of substance use
- Demonstrate appropriate emergency response procedures
- Access appropriate support resources for themselves and others
- Identify their “why” — their purpose for maintaining long-term well-being
- Access appropriate campus and community support services
- Develop personal intentions for healthy choices



RespectEdu Course Objectives

After taking this online course, first-year students will be able to:

- Identify and apply the four key components of the social toolkit while recognizing how they interconnect in relationship building
- Demonstrate understanding of both personal boundaries and social awareness in sexual and interpersonal contexts
- Practice active listening and clear communication techniques for expressing needs and preferences in relationships
- Define and recognize the key characteristics of valid sexual consent
- Demonstrate understanding of bodily agency and its relationship to consent
- Apply clear communication techniques for obtaining, giving and maintaining ongoing consent
- Identify and challenge common assumptions that can compromise valid consent
- Recognize specific situations where consent cannot be given or assumed
- Apply strategies to avoid coercive behaviors and maintain clear communication about consent
- Develop healthy coping strategies for managing rejection and disappointment in romantic contexts
- Apply self-regulation techniques and emotional intelligence concepts to challenging situations
- Demonstrate understanding of perspective-taking and healthy emotional processing
- Apply bystander intervention techniques in various scenarios
- Identify and overcome common barriers to intervention
- Recognize enabling behaviors and develop strategies to prevent harmful situations
- Identify and utilize available support resources both on and off campus
- Demonstrate understanding of the reporting process and available options for seeking help
- Develop effective strategies for supporting friends who have experienced sexual assault while maintaining appropriate boundaries

Class Meeting

The Culture of Consent and Community Care class meeting is held during Orientation. Through personal narratives and a series of videos, returning students orient the incoming class to Brown's commitments and values and the expectations of them as the newest members of Brown's community.

Objectives

After participating in this class meeting, first-year students will be able to:

- Describe two ways that consent and bodily autonomy are cultural norms for the Brown community in everyday interactions
- Describe two ways to articulate, recognize and respect boundaries within sexual interactions
- Identify two resources for interpersonal violence response on campus
- Describe two ways that help-seeking behaviors are valued within the Brown community
- Identify two resources for seeking help with substance abuse
- Articulate two ways to make informed decisions around alcohol and other drug use
- Describe two ways that alcohol and other drug use may positively and/or negatively contribute to social

well-being (sense of belonging and making connections)

- Identify two ways to support and demonstrate respect for students who choose to be substance free

Structure and Methodology

The class meeting includes content delivered through live student testimonials, videos of consent scenarios and campus resources. A cast of five to seven returning students write and deliver testimonials about personal experiences that illustrate the class meeting's objectives, discuss and frame the videos, and welcome the new class.

The meeting is structured as follows:

- Opening
- Sophomore — Importance of Meeting Testimonial (Objectives 1, 4)
- Consent Videos and Debrief (Objectives 1, 2)
- Culture of Consent Testimonial (Objectives 1, 2, 4)
- Resources Video (Objectives 3, 5)
- Alcohol and Being True to Self Testimonial (Objectives 6, 7)
- Sub Free at Brown Testimonial (Objectives 4, 5, 6, 7, 8)
- Alcohol and Community Care Testimonial (Objectives 6, 7)
- Closing

Community Meetings

Community meetings are held a day or two after the class meeting in Bruno Leader communities. The small group meetings build students' skills — around consent, bystander intervention and support for survivors — for application in their residential communities, friend groups and intimate relationships.

Objectives

After participating in the community meeting, first-year students will be able to:

- Identify the five elements of consent — that consent is: 1) freely given, 2) reversible, 3) informed, 4) engaged and 5) specific
- Identify language for clear communication about consent during a sexual interaction
- Discuss indicators of harmful situations that require intervention and brainstorm safe and effective methods to intervene
- Name four best practices for supporting a survivor of sexual violence

Structure and Methodology

During Orientation, and following the class meeting, Bruno Leader groups gather and are led in activities and discussion by a facilitation team of one Bruno Leader (student orientation leader) and one BWell student leader. The facilitation teams are trained by BWell professional staff to deliver the one-hour curriculum.

The community meetings are structured as follows, with interactive learning activities and guided discussion for each section:

- Communication and Consent (Objectives 1, 2)
- Bystander Intervention (Objective 3)
- Supporting Survivors (Objective 4)

Other BWell Programs

BWell Health Promotion supports the development of skills for lifelong, holistic health and well-being for all Brown students by offering interventions that are both community- and evidence-informed, and rooted in social justice to empower growth and the ability to thrive, prevent health disparities and respond to emergent needs. BWell actively contributes to creating a University that fosters a safe, supportive and inclusive learning and living environment. This is achieved through theory-driven and evidence-informed educational interventions that identify the interplay of power, privilege and oppression and seek to address the roots of interpersonal violence and increase positive relationships for students.

A central focus of BWell is to design, implement and evaluate empowerment and prevention education through programming and awareness campaigns for Brown students as well through peer education programs: Sexual Assault Prevention Education (SAPE), Sexual Health Awareness Group (SHAG) and the B-TEAM (Brown Transforming, Exploring and Affirming Masculinities).

Types of Intervention

- Support Groups: Weekly harm and healing group for survivors
- Trainings for student leaders and paraprofessionals at Brown (community counselors, EMTs, peer advisors and educators) addressing consent, sexual violence prevention and/or response, bystander intervention, trauma-informed practices, fulfilling relationships, masculinity and gender roles
- BWell staff- and peer-led workshops and Culture of Consent Orientation program addressing consent, sexual violence prevention and/or response, fulfilling relationships, masculinity and gender
- Professional development, supervision and mentorship of peer educators providing primary and secondary prevention roles
- Passive awareness campaigns, including print and digital social marketing campaigns on the elements of consent, where to get support and to report, bystander intervention skills, and dynamics of coercive and healthy relationships

Blue Light Emergency Phones

There are approximately 150 outdoor emergency phones located on or near the exterior of all residence halls and most University buildings. They are also located on campus walkways and parking garage. Additionally, there are 45 elevator phones in various campus buildings.

Outdoor emergency phones are housed in gray or yellow Lexan cases, are mounted directly to buildings or stanchions, and have a blue light above them. These phones can be used to place calls through the University phone system and have a direct speed-dial button (marked in red) with an automatic identifier so that the Communications Dispatch Center will know the caller's location. When getting acquainted with the campus, new students, staff and faculty should try to note the locations of these phones.

How to Use the Blue Light Emergency Phone:

- To activate the emergency phone, press the **RED** emergency button and the phone will automatically dial Public Safety. Wait for the dispatcher to answer and explain the problem. A blue light will flash above the

phone so that responding personnel can more easily locate you.

- To place an on-campus call, press the black button and wait for a dial tone, then dial the extension number and press the black button when completed.

View or download a campus map showing the locations of blue light emergency phones at facilities.brown.edu/maps.

Public Safety Technology

Public Safety Technology, within the Office of Information Technology (OIT), provides strategic planning, system development and support for Public Safety and Emergency Management and all the University's public safety systems and initiatives. The functional areas of this team include but are not limited to:

- oversight, physical support and maintenance of the University's access control system, CCTV video security system and other building security systems;
- strategic planning and roadmaps;
- administration of public safety applications; and
- strategic partnership with Public Safety to enhance public safety systems, computing and networking.

Access Control

Access to most University facilities is intended to be restricted to students, staff and faculty of Brown or those with legitimate business with the University. Any person on University property must be able to show proper identification upon request. During evening and weekend hours, most University facilities are kept locked, and both key and card access are restricted to individuals who obtain authorization through proper administrative channels.

Security of both personal and property in residence halls relies greatly on the precautions taken by student residents. Room doors, exterior doors, basements, adjacent fire escapes and fire doors on every floor should be kept locked at all times. Fire doors should be closed. Alarms will be generated within the security systems for any exterior doors propped open where the door is controlled by card access. Do not prop doors open. Close any doors you find propped open. Report immediately to Public Safety any thefts, or attempted thefts, as well as suspicious activity, so that officers may be dispatched to investigate.

A campus-wide access control system has been installed in all residential dorms and in administrative buildings on campus. There is 24-hour monitoring of the system and an officer is dispatched if a door is propped, or held open too long, or forced open. As with all technology, the system is not infallible, and all students are advised to remain vigilant with regard to security matters.

CAMPUS CRIME REPORT

Definition of Categories

Aggravated assault is 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.

Arrest is defined as persons processed by arrest, citation or summons.

Arson is 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 is the unlawful entry of a structure to commit a felony or a theft.

Dating violence is defined as 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. Dating violence includes, but is not limited to, sexual or physical abuse or the threat of abuse. Dating violence does not include acts covered under the definition of domestic violence.

Destruction/damage/vandalism of property is 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.

Domestic violence is defined as 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; and/or by any other person against an adult or youth victim who is protected from that person's acts under the domestic or family violence laws of the jurisdiction in which the crime of violence occurred.

Drug abuse violations are defined as the violation of laws prohibiting the production, distribution and/or use of certain controlled substances and the equipment or devices utilized in their preparation and/or use. This includes the unlawful cultivation, manufacture, distribution, sale, purchase, use, possession, transportation or importation of any controlled drug or narcotic substance, and arrests for violations of state and local laws, specifically those relating to the unlawful possession, sale, use, growing, manufacturing and making of narcotic drugs.

Hate crime is a criminal offense that manifests evidence that the victim was intentionally selected because of the perpetrator's bias against the victim. Under the Clery Act, the following categories are reported: race, religion, sexual orientation, gender, gender identity, ethnicity, national origin and disability. Hate crimes include any of the following offenses that are motivated by bias: murder and non-negligent manslaughter, rape, fondling, incest, statutory rape, robbery, aggravated assault, burglary, motor vehicle theft, arson, larceny-theft, simple assault, intimidation, and destruction/damage/vandalism of property.

Intimidation is 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 is the unlawful taking, carrying, leading or riding away of property from the possession or constructive possession of another.

Liquor law violations are defined as 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.

Manslaughter by negligence is defined as the killing of another person through gross negligence.

Motor vehicle theft is the theft or attempted theft of a motor vehicle.

Murder and non-negligent manslaughter is defined as the willful (non-negligent) killing of one human being by another.

Referred for disciplinary action is defined as the referral of any person to any official who initiates a disciplinary action of which a record is established and which may result in the imposition of a sanction.

Robbery is the taking or attempting to take anything of value from the care, custody or control of a person or persons by force or threat of force or violence and/or by putting the victim in fear.

Sexual assault (sex offenses) is any sexual act directed against another person, without consent of the victim, including instances where the victim is incapable of giving consent.

Rape is 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.

Fondling is the touching of the private body parts of another person for the purpose of sexual gratification, without the consent of the victim, including instances where the victim is incapable of giving consent because of their age or because of their temporary or permanent mental incapacity.

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

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

Simple assault is 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.

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

Weapons violation (carrying, possessing, etc.), is defined as the violation of laws or ordinances prohibiting the manufacture, sale, purchase, transportation, possession concealment, or use of firearms, cutting instruments, explosives, incendiary devices or other deadly weapons. This classification encompasses weapons offenses that are

regulatory in nature.

Clery Geographic Definitions

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

On-campus student housing facilities include is any student housing facility that is owned or controlled by the institution, or is located on property that is owned or controlled by the institution, and is within the reasonably contiguous geographic area that makes up the campus.

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

Non-campus includes any building or property owned or controlled by a student organization that is officially recognized by the institution; or any building or property owned or controlled by an institution that is used in direct support of, or in relation to, the institution's educational purposes, is frequently used by students, and is not within the same reasonably contiguous geographic area of the institution.

Brown's Approach to Reporting Sexual and Gender-Based Violence Statistics

Brown University takes a proactive approach to addressing the serious national issue of sexual- and gender-based harassment and violence on college campuses.

In October 2019 — four years after playing a key role in the nation's first comprehensive climate survey of college students on sexual assault and misconduct — the University released the results of a follow-up study in which Brown students reported increased trust in the University and knowledge of resources related to sexual and gender-based misconduct. In the years prior to the study, Brown transformed its approach to prevention; adopted a unified policy that applies to the entire campus community; implemented a new approach to investigating and resolving complaints in a prompt, fair and impartial manner; and created a Title IX and Gender Equity Office to oversee efforts.

As part of this work, Brown has proactively encouraged a culture in which students report incidents of sexual assault and misconduct and seek support and assistance from the University. In addition, while some confidential resources are not required by the Clery Act to report Clery crimes, at Brown confidential staff members are encouraged to inform persons being counseled/treated of procedures to report crimes on a voluntary, confidential basis to a campus security authority. The University provides statistics on reported incidents through both an annual Title IX and Gender Equity Office report and through this Annual Security Report. Brown expects that in some years, its number of reports of sex offenses may exceed those of other institutions, given encouragement of reporting of these types of incidents.

BROWN UNIVERSITY CRIMINAL OFFENSE STATISTICS

January 1, 2022 to December 31, 2024

Criminal Offenses	2024				2023				2022				Student Housing Facility Included with On-Campus		
	On-Campus	Non-Campus	Public Property	Total	On-Campus	Non-Campus	Public Property	Total	On-Campus	Non-Campus	Public Property	Total	2024	2023	2022
Murder/Non-Negligent Manslaughter	0	0	0	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	0	0	0
Rape	10	0	0	10	20	0	0	20	21	0	0	21	9	16	17
Fondling	2	0	1	3	12	0	0	12	11	0	1	12	2	2	8
Incest	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Statutory rape	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Robbery	0	0	0	0	0	0	2	2	0	0	2	2	0	0	0
Aggravated assault	1	0	0	1	1	0	3	4	0	0	28	28	1	1	0
Burglary	7	0	0	7	6	0	0	6	9	0	0	9	4	2	4
Motor vehicle theft	22	0	2	24	24*	0	0	24*	17	0	1	18*	0	0	0
Arson	3	0	0	3	0	0	0	0	1	0	0	1	3	0	1
Domestic violence	6	0	0	6	12	0	0	12	1	0	0	1	5	11	1
Dating violence	1	0	0	1	4	0	1	5	6	0	0	6	1	2	4
Stalking	9	0	0	9	8	0	0	8	12	0	0	12	5	1	4

*2024, 2023, and 2022 motor vehicle theft statistics include electric bicycles and electric scooters

UNFOUNDED REPORTS

2024 - zero 2023 - zero 2022 - zero

BROWN UNIVERSITY HATE CRIME STATISTICS

2024	1-On Campus/Vandalism/Gender 1-Public Property/Intimidation/ Gender Identity 2-On Campus/Intimidation/Religion 1-Public Property/Intimidation/ Ethnicity	2023	1-Student Housing/Simple Assault/ Sexual Orientation 1-Public Property/Vandalism/Religion 1-On Campus/Vandalism/Religion	2022	1-Public Property/Aggravated Assault/Sexual Orientation 1-Public Property/Vandalism/Religion 1-On Campus/Vandalism/Religion 1-Public Property/Intimidation/ Religion
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ARRESTS FOR WEAPONS, DRUG ABUSE AND LIQUOR LAW VIOLATIONS

January 1, 2022 to December 31, 2024

	2024				2023				2022				Student Housing Facility Included with On-Campus		
	On- Campus	Non- Campus	Public Property	Total	On- Campus	Non- Campus	Public Property	Total	On- Campus	Non- Campus	Public Property	Total	2024	2023	2022
Weapons	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Drug abuse	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Liquor law	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

DISCIPLINARY REFERRALS FOR WEAPONS, DRUG ABUSE AND LIQUOR LAW VIOLATIONS

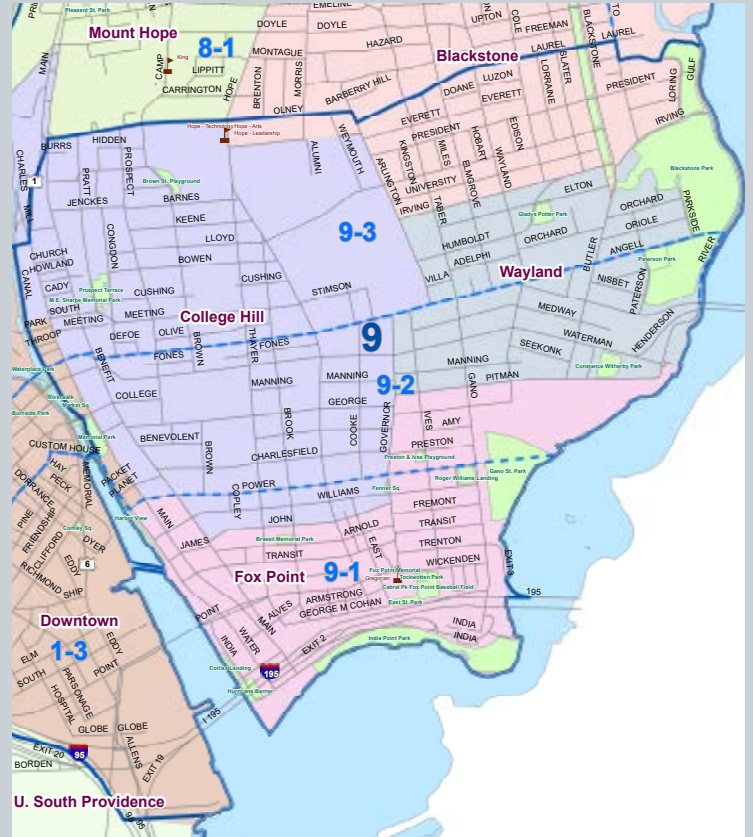
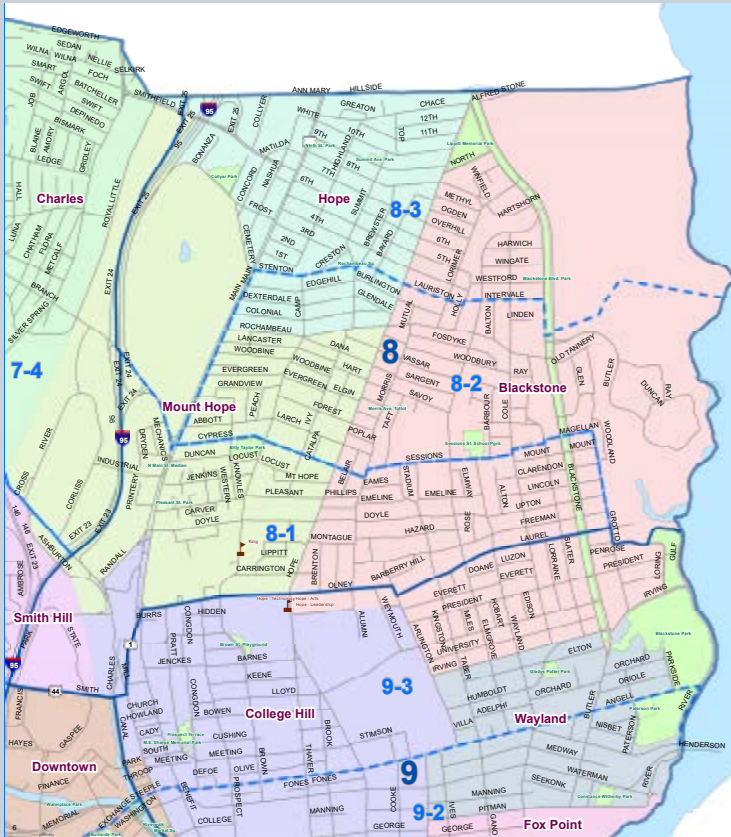
January 1, 2022 to December 31, 2024

	2024				2023				2022				Student Housing Facility Included with On Campus		
	On- Campus	Non- Campus	Public Property	Total	On- Campus	Non- Campus	Public Property	Total	On- Campus	Non- Campus	Public Property	Total	2024	2023	2022
Weapons	1	0	0	1	1	0	0	0	1	0	0	1	0	0	1
Drug abuse	12	0	0	12	8	0	0	20	8	0	0	8	8	20	6
Liquor law	110	0	0	110	62	3	3	96	153	0	0	153	62	73	129

PROVIDENCE POLICE DEPARTMENT CRIMINAL OFFENSE STATISTICS
East Side of Providence

	District 8-1			District 8-2			District 8-3			District 9-1			District 9-2			District 9-3		
	2024	2023	2022	2024	2023	2022	2024	2023	2022	2024	2023	2022	2024	2023	2022	2024	2023	2022
Homicide	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Rape	3	2	0	1	3	1	1	1	3	8	1	0	2	3	1	0	5	0
Fondling	0	0	0	4	0	1	0	1	0	0	0	0	0	0	0	0	0	1
Incest	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Statutory rape	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Robbery	0	0	2	0	0	2	0	1	3	1	0	0	0	1	0	0	0	4
Aggravated assault	6	0	5	3	6	3	7	4	6	7	4	6	3	1	0	1	4	6
Burglary	6	12	12	2	9	10	1	4	11	8	8	34	6	8	25	9	16	30
Motor vehicle theft	13	14	13	6	6	9	4	5	13	10	7	15	10	5	14	9	5	22
Arson	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Weapons violation	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Drug abuse violation	0	0	0	0	0	0	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	0	0	0	0	0	0
Hate crimes	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Domestic violence	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Dating violence	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Stalking	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

PROVIDENCE POLICE DEPARTMENT DISTRICT MAP East Side of Providence



Providence statistics are referenced by the specific district servicing the indicated area.

Providence Police Department statistics may include reports also counted by the Brown University Department of Public Safety.

Visit [Providence Police Department's website](https://www.providencepolice.org/) for further information.

LOCAL POLICE CRIMINAL STATISTICS FOR OFF-CAMPUS HOSPITAL RESEARCH AND TRAINING SITES

	RI Hospital/Woman & Infants (Providence)			Roger Williams Medical Ctr (Providence)			Bradley Hospital (East Providence)			Miriam Hospital (Providence)			Butler Hospital (Providence)		
	2024	2023	2022	2024	2023	2022	2024	2023	2022	2024	2023	2022	2024	2023	2022
Homicide	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Sex offenses	4*	*2	*3	0	0	**2	0	0	0	0	0	0	0	0	0
Robbery	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0
Aggravated assault	14	16	12	5	13	4	0	0	0	0	0	0	0	0	0
Burglary	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Motor vehicle theft	2	2	5	1	0	5	0	0	0	0	0	0	0	0	0
Arson	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Weapons violation	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Drug abuse violation	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Liquor law violation	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Hate crimes	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Domestic violence	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Dating violence	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Stalking	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

2024 *includes 4 rape offenses

2023 *includes 1 rape and 1 fondling offense

2022 *includes 2 rapes and 1 fondling offense **includes 2 rape offenses

APPENDIX A

Title IX Policy

1.0 Policy Purpose

This policy prohibits Sexual Harassment, Sexual Assault, Dating Violence, Domestic Violence, and Stalking, in addition to Retaliation against an individual for making a Report of conduct prohibited under this policy or for participating in an investigation of an alleged violation of this policy. It also defines Prohibited Intimate Relationships between individuals where one individual has power or authority over another which could create a hostile environment.

This policy is in accordance with Title IX of the Education Amendments of 1972; relevant provisions of the Violence Against Women Act; Title VII of the Civil Rights Act of 1964; the Jeanne Clery Campus Safety Act; their implementing regulations; and other applicable federal and Rhode Island state laws and regulations.

Concerns about Brown's application of this policy may also be addressed to the **United States Department of Education, Office for Civil Rights**, at OCR@ed.gov or (800) 421-3481 or the Rhode Island Commission for Human Rights.

2.0 To Whom the Policy Applies

This policy applies broadly to the entire Brown University ("Brown" or "the University") community including applicants, employees, invitees, students, and contractors collectively known as "Covered Persons." This policy pertains to acts of Prohibited Conduct committed by or against Covered Persons when:

- (i.) the conduct occurs, in the United States, on property owned, leased, or controlled by Brown University; and/or
- (ii.) the conduct occurs off-campus, in the United States, involving locations, events, or circumstances over which Brown exercises substantial control over both the Respondent and the context in which the alleged Prohibited Conduct occurred, including but not limited to off-campus research, internships, mentorships, summer sessions, clerkships, graduate student fellowships, or other affiliated programs.

3.0 Policy Statement

This policy aims to establish and maintain an inclusive learning, living, and working environment where healthy, respectful, and consensual conduct represents a campus cultural norm that is free from discrimination and harassment. To that end, this policy requires Covered Persons to act in a manner that does not intentionally or unintentionally discriminate against or create a hostile environment for another on the basis of their actual or perceived gender, gender-identity and gender-expression, and sexual orientation (Sexual Harassment). It also prohibits certain relationships of a sexual or intimate nature between Students and Employees (Prohibited Intimate

Relationships). Sexual Assault, Dating Violence, Domestic Violence, and Stalking as defined in the Violence Against Women's Act (VAWA) are prohibited by this policy. This policy is written and interpreted broadly to include online and cyber manifestations of Prohibited Conduct. Additionally, this policy prohibits retaliation against an individual for making a report of conduct prohibited under this policy or for participating in an investigation of an alleged violation of this policy (Retaliation). These behaviors will be collectively known as Prohibited Conduct and are actions that undermine the character and purpose of Brown University and will not be tolerated.

It is the responsibility of every member of the Brown University community to foster an environment free from discrimination and harassment. Covered Persons must be respectful of power dynamics and privilege associated with their role, position, rank, or identity and avoid actions that would leverage that power to compel others to consent to unwanted behavior or deny others equal access to the programs and activities of Brown. Abusing or taking advantage of one's power, supervision, or authority over another is unacceptable and may create a hostile environment for the individuals involved, and the community at large, that seriously undermines the atmosphere of trust essential to the academic enterprise.

All University community members are encouraged to take reasonable and prudent actions to prevent or stop the conduct prohibited by this policy. This may include direct intervention when safe to do so, enlisting the assistance of others, contacting law enforcement, or seeking assistance from a person in authority. University community members who choose to exercise this positive responsibility will be supported by Brown University and protected from retaliation.

3.1 Reporting

3.1.1 Designated Reporting Locations

The University encourages individuals harmed or targeted by or witnesses of Prohibited Conduct to report incidents to Mindy Wirges, Brown's Title IX Coordinator. The Title IX Coordinator oversees the University's response to these reports. Individuals can report incidents directly to the:

Title IX and Gender Equity Office

20 Benevolent Street
titleixoffice@brown.edu
(401) 863-2026
(401) 863-5140

[Online reporting form](#)

Deputy Title IX Coordinators

Yolanda Castillo-Appollonio, Deputy Title IX Coordinator for Students;
Senior Associate Dean and Director of Student Conduct and Community Standards
(401) 863-2653

Lindsay Orchowski, Deputy Title IX Coordinator for the Medical School and
Associate Professor of Psychiatry and Human Behavior (Research)
(401) 444-7021

Maria E. Suarez, Deputy Title IX Coordinator for Graduate Students;
Associate Dean of Student Support Services
(401) 863-1802

Anne Windham, Deputy Title IX Coordinator for Faculty;
Senior Associate Dean of the Faculty
(401) 863-5410

Reports that involve an imminent safety risk should go to:

Public Safety and Emergency Management

75 Charlesfield Street
Emergency Line: (401) 863-4111
Non-Emergency Line: (401) 863-3322

In all cases in this process, when the term “Title IX Coordinator” or other University official is referenced, the term shall also mean a designee.

3.1.2 On-Campus Resources

Individuals may speak with or seek services from on-campus resources to learn the available Support Measures. The following offices are considered private but not confidential:

Student Support Services

(401) 863-3145

Administrator On Call (AOC)

(401) 863-3322
Page-Robinson Hall, Fifth Floor

Public Safety

(401) 863-4111
Emergency Line: (401) 863-4111
Non-Emergency Line: (401) 863-3322

Office of International Student and Scholar Services (OISSS)

(401) 863-2427
Page-Robinson Hall, Fourth Floor

3.1.3 Confidential Support Services

Individuals may also speak with a confidential resource to learn the available support measures and complaint options. The following offices are confidential resources and are under no obligation to disclose the content of conversations with the Title IX and Gender Equity Office. Disclosure to a confidential resource does not constitute a report or actual knowledge to the University. Confidential resources are:

Athletic Trainers

(401) 863-3851
OMAC
235 Hope Street

Counseling and Psychological Services (CAPS)

(401) 863-3476
Page-Robinson Hall 512

Brown Emergency Medical Services (EMS)

401-863-4111

Employee Assistance Program (Spring Health)

(855) 629-0554 / (844) 773-1425

Office of the Chaplains and Religious Life

(401) 863-2344
Page-Robinson Hall 410

Sexual Assault Response Line

(401) 863-6000

Sexual Harm Acute Response and Empowerment (SHARE) Advocates

(401) 863-2794
450 Brook Street

Student Health Services

(401) 863-3953
Student Health and Wellness Center
450 Brook Street

University Ombuds

(401) 863-6145
Brown-RISD Hillel Building, Third Floor

3.1.4 Community Resources

Brown University also strongly encourages anyone who becomes aware of an alleged incident of Prohibited Conduct which may constitute a violation of Rhode Island state law to report the incident to local law enforcement, and will provide support, resources, and assistance to those who do so.

Providence Police Department

Emergency: 911
Non-Emergency: (401) 272-3121

Day One (Sexual Assault and Trauma Center)

Helpline: (800) 494-8100

Rhode Island Bar Association (Legal Assistance)

(401) 421-5740

Email: info@ribar.com

U.S. Citizenship and Immigration Services (Visa and Immigration Assistance)

[Find Help in Your Community website](#)

American Immigration Lawyers Association (Visa and Immigration Assistance)

Email: ils@aila.org

3.1.5 Mandatory Reporters

Taking meaningful action when conduct prohibited by this policy occurs is a critical component to Brown's commitment to a campus that is free from discrimination and harassment. Brown asks faculty and staff in varying leadership roles who oversee the welfare of faculty, staff, students, and University programs to assist us in these efforts by reporting all disclosures or knowledge of Prohibited Conduct to the Title IX Coordinator. Such reports amplify the University's ability to know what is occurring within its programs and activities and to respond accordingly. The Title IX Coordinator will conduct an initial assessment of these reports and will do so in a manner consistent with the privacy choices of the Complainant or reporting party.

Community members who are mandated to report allegations of Prohibited Conduct to the Title IX Coordinator are:

- Academic department chairs and directors of University institutes (e.g., Carney, IBES, ICERM)
- Athletic Team Head Coaches and Assistant Coaches including Strength and Conditioning Coaches
- Community Coordinators
- Deans and Directors in Campus Life
- Deans and Directors in the College
- Deans and Directors in the Graduate School
- Deans and Directors of Pre-College and Undergraduate Programs
- Deans and Directors in the Office of the Dean of the Faculty, and the Schools of Engineering, Public Health, Professional Studies and Watson School of International and Public Affairs
- Deans and Directors in the Warren Alpert Medical School
- Public Safety and Emergency Management
- Deputy Title IX Coordinators
- Director of Athletics and Assistant, Associate and Deputy Directors of Athletics
- Directors, Assistant Directors and Area Coordinators in University Residential Life and Housing Programs; Centers' Assistant Directors and Program Coordinators

- Directors of Undergraduate Studies
- Directors of Graduate Studies

Any questions about the status of an employee as a Mandatory Reporter should be addressed to the Title IX Coordinator.

All other faculty, staff and students not designated as a Mandatory Reporter are strongly encouraged to report allegations of Prohibited Conduct to the Title IX Coordinator or a Deputy Title IX Coordinator. Before making this disclosure, employees should confer with the individual harmed or targeted by the Prohibited Conduct to make sure they are aware of the requirement to make this referral.

Upon receipt of a report or other knowledge of alleged Prohibited Conduct, the Title IX Coordinator will contact the individual(s) alleged to be harmed by or subjected to the Prohibited Conduct to inform them in writing of the (i.) available Support Measures, including options for, available assistance in, and how to request changes to academic, living, transportation, and working situations or protective measures, (ii.) confidential resources and support services on-campus, (iii.) the importance of preserving evidence related to the Prohibited Conduct alleged, (iv.) the process of filing a Formal Complaint, (v.) the option to file a civil or criminal complaint, and (vi.) a written explanation of their rights. The University will make such accommodations or provide such protective measures if the individual(s) alleged to be harmed by or subjected to the Prohibited Conduct requests them and if they are reasonably available, regardless of whether the individual chooses to report an alleged crime to Public Safety and Emergency Management or local law enforcement.

3.1.6 Time Frame for Reporting

There is no time limit on submitting a Formal Complaint to the Title IX Coordinator or designee. However, a Complainant pursuing a complaint resolution process associated with this policy must be participating in or attempting to participate in an educational program, employment, or other activity of Brown at the time of filing a Formal Complaint.

If the Complainant and/or Respondent is no longer affiliated with Brown (e.g., a report is made after a student is no longer enrolled or graduated or an employee is no longer employed by Brown), the ability to investigate, respond, and provide remedies may be more limited or impossible. The University will provide reasonably available and appropriate support measures, assist the Complainant in identifying external reporting options, and may take appropriate action to address the Prohibited Conduct.

The University applies the policy defining the Prohibited Conduct that was in effect at the time of the alleged conduct and the procedures that are in effect when the Formal Complaint is filed.

3.1.7 Amnesty

3.1.7.1 Personal Ingestion of Alcohol and Other Drugs

Brown University generally will offer amnesty to Complainants, Respondents, reporting parties, and witnesses who disclose the personal ingestion of alcohol or other drugs, in violation of [Brown University Code of Student Conduct](#), when making a report of Prohibited Conduct and/or participating in a complaint procedure associated with this policy. Although amnesty safeguards the individual from a disciplinary notation or finding of responsible for a policy violation for drugs or alcohol, it does not exempt the University from taking appropriate action to address the conduct and/or mitigate future violations.

3.1.7.2 Violation of Healthy Brown Public Health Protocols

Brown University generally will offer amnesty to Complainants, Respondents, reporting parties, and witnesses who disclose participating in activities that do not adhere to established health protocols when making a report of Prohibited Conduct or participating in a complaint procedure associated with this policy unless the University determines that there was malicious intent. Although amnesty safeguards the individual from a disciplinary notation or finding of responsible for a policy violation, it does not exempt the University from taking appropriate action to address the conduct and/or mitigate future violations.

3.2 Academic Freedom

Brown University is committed to the principles of free inquiry and expression. Vigorous discussion and debate are fundamental to this commitment, and this policy is not intended to restrict teaching methods. Nothing in this Policy will be construed to negate any rights afforded in the Faculty Rules and Regulations, Part 5, Section 12.I.C.

3.3 Confidentiality and Privacy

3.3.1 Confidentiality

Confidentiality is a legal concept prohibiting designated campus or community professionals from revealing identifiable information shared by an individual to any other person without express permission of the individual, or as otherwise permitted or required by law. Those campus and community professionals who maintain information confidentially are:

- Health care providers in Brown University Health Services including EMTs,

- Clinicians in Counseling and Psychological Services (CAPS),
- the Sexual Harassment and Assault Resources and Education (SHARE) Advocate(s),
- Ordained clergy with privileged confidentiality recognized by Rhode Island state law, and
- University Ombuds.

These individuals are prohibited from breaking confidentiality unless (i.) given permission to do so by the person who disclosed the information; (ii.) there is an imminent threat of harm to self or others; (iii.) the conduct involves suspected abuse of a minor under the age of 18; or (iv.) as otherwise required or permitted by law or court order.

3.3.2 Privacy

Privacy means that information related to a report of Prohibited Conduct will be treated with the utmost discretion and will be shared only with a limited circle of individuals who “need to know” in order to assist in the review, investigation, and resolution of the report, and/or other disclosures necessary to fulfill University operations.

3.4 Conflict of Interest

The [Brown University Conflict of Interest and Commitment Policy](#) and its related guidelines apply to all members of the Brown community and to all processes and procedures, including all investigative and disciplinary procedures in place to support and implement this policy. A conflict of interest may arise when a member of the Brown community may be able to use the authority of their position to influence a University decision, action, or outcome with regard to the implementation and enforcement of this policy, including associated investigative and disciplinary procedures. It is the responsibility of all members of the Brown community involved in any aspect of a report of Prohibited Conduct to read the University’s Conflict of Interest and Commitment Policy and to disclose potential or actual conflicts as they arise to the Title IX Coordinator or University Human Resources for employees.

3.5 Training and Education

As part of its commitment to the prevention of Prohibited Conduct, Brown University offers education and awareness programs to bring awareness to and reduce the occurrence of Prohibited Conduct. Incoming students and new faculty and staff receive prevention and awareness programming as a requirement of their orientation.

The Title IX Coordinator and Investigators receive annual training on identifying and mitigating implicit and explicit bias, the definitions of Prohibited Conduct, the scope of a recipient’s education program and activities, how to conduct investigations, and managing a

complaint resolution process including hearings, appeals, and informal resolution processes.

Everyone involved in the handling of Title IX matters, including Deputy Title IX Coordinators, Title IX Council members, and Hearing Officers, receives annual training from the Title IX and Gender Equity Office to hear cases on conduct prohibited by this policy. The training provides an overview of identifying and mitigating implicit and explicit bias, applying the preponderance of evidence standard, the definition of Prohibited Conduct, and understanding key concepts such as consent, incapacitation, and hostile environment. The training also strengthens panelist skills in asking questions, reviewing the investigation report, and determining discipline.

4.0 Definitions

For the purpose of this policy, the terms below have the following definitions:

Administrative Leave: Administrative Leave is when the institution places an Employee on an interim work, supervision, leadership, or teaching suspension after the filing of a Formal Complaint against the Employee.

Advisor: An advisor is an individual of the Complainant's or Respondent's choosing, including an attorney, to provide support during the complaint process. *More on the role and responsibility of an advisor can be found in the [Title IX Grievance Procedure](#).*

Coercion: Coercion is verbal and/or physical conduct, including intimidation, unwanted contact, and express or implied threats of physical, emotional, or other harm, that would reasonably place an individual in fear of immediate harm and that is employed to compel someone to engage in sexual contact.

Complainant: A Complainant is the individual(s) who is alleged to be the victim of behavior that could constitute Prohibited Conduct. A Complainant seeking to use the [Title IX Grievance Procedure](#) associated with this policy must have been participating in or attempting to participate in an educational program, employment, or activity of Brown at the time the formal complaint is submitted.

Consent: Consent is an affirmative and willing agreement to engage in specific forms of sexual contact with another person. Consent requires an outward demonstration, through mutually understandable words or actions, indicating that an individual has freely and affirmatively chosen to engage in sexual contact. Consent cannot be obtained through: (1) the use of coercion or force or (2) by taking advantage of the incapacitation of another individual.

Silence, passivity, incapacitation from alcohol or drugs, or the absence of resistance does not imply Consent. It is important not to make assumptions; if confusion or ambiguity arises during a sexual interaction, it is essential that each participant stops and clarifies the other's willingness to continue.

Consent can be withdrawn at any time. When Consent is withdrawn, sexual activity must cease. Prior Consent does not imply current or future Consent; even in the context of an ongoing relationship, Consent must be sought and freely given for each instance of sexual contact. An essential element of Consent is that it be freely given. Freely given Consent might not be present, or may not even be possible, in relationships of a sexual or intimate nature between individuals where one individual has power, supervision, or authority over another.

In evaluating whether Consent was given, consideration will be given to the totality of the facts and circumstances, including but not limited to the extent to which a Complainant or reporting party affirmatively uses words or actions indicating a willingness to engage in sexual contact, free from Coercion; whether a reasonable person in the Respondent's position would have understood such person's words and acts as an expression of Consent; and whether there are any circumstances, known or reasonably apparent to the Respondent, demonstrating Incapacitation.

Covered Persons:

- **Applicants:** Individuals who have expressed an interest in applying or have applied for employment or enrollment as a student.
- **Contractors:** Independent contractors, vendors, or other third parties contractually obligated to perform services for Brown University.
- **Employees:** Individuals employed by Brown University, including faculty, affiliates, visiting faculty, postdoctoral fellows, and all staff (including all exempt and non-exempt, bargaining unit, and senior administrative positions), as well as those physicians and health scientists who are not employed by Brown University but have Brown University faculty, affiliate, postdoctoral, or house staff appointments for the purpose of teaching and/or research in the Division of Biology and Medicine.
- **Invitees:** Visitors or guests of Brown University.
- **Students:** Individuals enrolled in the College, the Graduate School, the Warren Alpert Medical School, the School of Public Health, the School of Engineering, the School of Professional Studies and/or The Watson School of International and Public Affairs..
- **For RISD students who are not dually enrolled at Brown, the Title IX and Gender Equity Office will work with the RISD Title IX Office to determine jurisdiction.**

Day: All references in this policy to days refer to business days unless specifically noted as calendar days. A business day is when the University is in normal operation.

Discipline: A consequence imposed on a Respondent following a determination that the Respondent violated this policy. A Respondent who is found responsible for violating the policy is subject to one or more of the following disciplinary actions:

- A verbal or written warning
- Probation

- Suspension
- Expulsion
- Revocation of or withholding a degree
- Academic transcript notation (see Note below)
- Restitution for damage to property
- Reflection or research papers or other academic assignments
- Letters of apology
- Restorative circles
- Attending or presenting educational programs or training
- No Contact Orders
- Referrals to other offices and resources on campus
- Administrative leave with or without pay
- Termination of employment
- Termination of relationship with the University
- Change in job description

Emergency Removal: Emergency Removal is the process where the institution places a Respondent on an interim suspension, interim leave of absence, and/or interim removal from campus. The Title IX Coordinator will bring reports that may necessitate an Emergency Removal to the Behavioral Assessment and Response Team in the case involving Student Respondents, or convene a risk assessment group for cases involving Employee Respondents to determine whether there is reasonable cause to believe that the Prohibited Conduct is likely to continue and/or the Respondent poses a significant threat of harm to the health, safety, and welfare of others or the University community.

If the Behavioral Assessment and Response Team determines that an Emergency Removal of a student is warranted, it will recommend that action to the Associate Vice President for Campus Life and Dean of Students who will decide whether to implement the Emergency Removal. Emergency Removals of a student can be appealed to the Vice President for Campus Life. Brown may remove a student on an emergency basis with or without the completion of a complaint resolution process.

Force: Force is the use or threat of physical violence to overcome an individual's freedom of will to choose whether or not to participate in sexual contact.

Formal Complaint: A written and signed document submitted by a Complainant (or the Title IX Coordinator in lieu of a Complainant) alleging that a Covered Person has engaged in conduct prohibited by this policy. A Formal Complaint should include the identities of the parties involved (if known), the Prohibited Conduct alleged, the date and location of the alleged incident (if known), and the details of the incident. The Formal Complaint will be shared with the Respondent and the investigator upon the initiation of an investigation.

Incapacitation: An individual who is incapacitated lacks the ability to make informed judgments and cannot consent to sexual contact. Incapacitation is the inability, temporarily or permanently, to give consent because an individual is mentally and/or physically helpless, asleep, unconscious,

or unaware that sexual activity is occurring. Mentally helpless means a person is rendered temporarily incapable of appraising or controlling one's own conduct. Physically helpless means a person is physically unable to verbally or otherwise communicate consent or unwillingness to an act.

Where alcohol or other drugs are involved, Incapacitation is a state beyond impairment or intoxication. Where alcohol or other drugs are involved, evaluating Incapacitation requires an assessment of how the consumption of alcohol and/or drugs affects a person's: decision-making ability; awareness of consequences; ability to make informed, rational judgments; capacity to appreciate the nature and quality of the act; or level of consciousness. The assessment is based on objectively and reasonably apparent indications of Incapacitation when viewed from the perspective of a sober, reasonable person.

Interim Action: A course of action taken by the University in response to a report of Prohibited Conduct. These measures may be both restorative (designed to address a Complainant's safety and well-being and continued access to educational opportunities) and remedial (involving action against a Respondent without unreasonably burdening a Respondent.) Interim actions may include housing relocation, on-campus housing restriction, change in work location or modification of work hours, restricted access to certain buildings or locations of campus, course reassignment or shift to remote course access, interim suspension and/or interim removal from campus, or interim administrative leave of absence. Interim action may be taken with or without a Formal Complaint or the implementation of a complaint resolution process and is individualized to protect the safety of all parties, the broader campus community, and/or prevent future Prohibited Conduct.

Prohibited Conduct: Includes Dating Violence, Domestic Violence, Prohibited Intimate Relationships, Sexual Assault (Rape, Fondling, Incest, Statutory Rape), Sexual Harassment, Retaliation and Stalking.

- **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 a consideration of the following factors: (1) length of the relationship; (2) type of relationship; and (3) the frequency of the interaction between the parties involved in the relationship. Dating Violence does not include acts covered under the definition of Domestic Violence. This definition is prescribed by the Violence Against Women Reauthorization Act of 2022.
- **Domestic Violence:** Domestic Violence is violence committed (i.) by a current or former spouse or intimate partner of the victim; (ii.) by a person with whom the victim shares a child in common; (iii.) by a person who is cohabitating with, or has cohabitated with, the victim as a spouse or intimate partner; (iv.) 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 (v.) by any other person against an adult or youth victim who is protected from that person's acts under the domestic or family violence laws of the jurisdiction in which the crime of violence occurred.

Domestic Violence includes, but is not limited to, physical, sexual, emotional, economic, and/or psychological actions or threats of action, including threatening to reveal personal or confidential information (including, but not limited, to information regarding one's gender identity and/or sexual orientation), that are intimidating, frightening, terrorizing, or threatening. Prohibited Conduct under this definition includes threats of violence or harm to one's self, one's family member(s) or friends, and/or one's pet. This definition is prescribed by the Violence Against Women Reauthorization Act of 2022.

- **Economic Abuse:** The term 'Economic Abuse,' in the context of Domestic Violence, Dating Violence, and abuse in later life, means behavior that is coercive, deceptive, or unreasonable controls or restrains a person's ability to acquire, use, or maintain economic resources to which they are entitled, including using Coercion, fraud, or manipulation to
 - (1) Restrict a person's access to money, assets, credit or financial information;
 - (2) Unfairly use a person's personal economic resources, including money, assets, and credit, for one's own advantage; or
 - (3) Exert undue influence over a person's financial and economic behavior or decisions, including forcing default on joint or other financial obligations, exploiting powers of attorney, guardianship, or conservatorship, or failing or neglecting to act in the best interests of a person to whom one has a fiduciary duty.
- **Technological Abuse:** An act or pattern of behavior that occurs within Domestic Violence, Sexual Assault, Dating Violence or Stalking and is intended to harm, threaten, intimidate, control, stalk, harass, impersonate, exploit, extort, or monitor, except as otherwise permitted by law, another person, that occurs using any form of technology, including but not limited to: internet enabled devices, online spaces ad platforms, computers, mobile devices, cameras and imaging programs, apps, location tracking devices, or communication technologies, or any other emerging technologies.
- **Prohibited Intimate Relationships:** No employee shall request or accept sexual favors from or engage in a romantic, sexual, or intimate relationship with any Brown University undergraduate student. This prohibition includes intimate relationships between student supervisors and supervisees, and undergraduate, graduate, or medical student teaching or research assistants, teaching fellows, or proctors, and any undergraduate student who is enrolled in a course or section taught by that individual or otherwise subject to that individual's academic supervision.

Relationships of a sexual or intimate nature between employees and graduate and medical students where the employee has power, supervision, or authority over the student is prohibited. No faculty, graduate or medical student, medical resident or fellow, postdoctoral fellow or associate, teaching or research assistant, fellow, or proctor shall request or accept sexual favors from or engage in a romantic, sexual, or intimate relationship with any graduate or medical student who is enrolled in a course or section taught by that individual or otherwise subject to that individual's academic supervision.

Academic supervision includes teaching, advising, supervising research, serving on a dissertation or other academic committee, grading, and/or having an influence upon funding and/or academic progress, and/or otherwise occupying a position of influence or power over a student's academic program.

Even when both parties have consented at the outset to the development of such a relationship, it is the person in the position of greater authority who may be investigated for or charged with Prohibited Conduct.

Pre-existing relationships of a sexual or intimate nature with a student or relationships between individuals who are faculty and staff must be disclosed on the Conflict of Interest Form and may require a Management Plan.

- **Retaliation:** Retaliation is any action, statement, or behavior meant as reprisal or retribution against an individual in response to the individual's good-faith report or participation in a proceeding related to this policy. Any retaliatory action taken directly or indirectly against a person who has made a report, filed a complaint, or participated in an investigation is prohibited.

Retaliation includes but is not limited to, intimidation, threats, harassment, and other conduct that would discourage a reasonable person from engaging in activity protected under this policy, such as seeking services, receiving protective measures and accommodations, and/or reporting Prohibited Conduct. This prohibition against Retaliation protects Complainants, Respondents, reporting parties, witnesses, hearing panelists, decision-makers, advisors, investigators, and other individuals who provide information relating to a Title IX investigation or participate in a complaint process associated with this policy.

- **Sexual Assault:** Sexual Assault is defined as a sexual act directed against another person, without the Consent of the other person, including instances where the target is incapable of giving Consent due to age or temporary or permanent mental or physical incapacity. Sexual Assault is the umbrella term for actions that constitute Rape, Fondling, Incest, and Statutory Rape. *This definition is prescribed by the Violence Against Women Reauthorization Act.*
 - **Fondling:** Forcible or non-forcible touching of the private body part (breast, buttocks, groin, genital, or other intimate part) of another person for the purpose of sexual gratification without Consent.
 - **Incest:** Sexual intercourse between persons who are related to each other within the degrees wherein marriage is prohibited by law.
 - **Rape:** Attempted or completed anal or vaginal penetration of another person, no matter how slight, by a body part or object without consent and/or completed or attempted oral penetration by a sex organ of another person.
 - **Statutory Rape:** Non-forcible sexual intercourse with a person who is under the statutory age of Consent.
- **Sexual Harassment:** Conduct on the basis of sex that occurs in Brown's education program or education activity and satisfies one or more of the following:
 - (i) An employee conditions the provision of an aid, benefit, or service on an individual's participation in unwelcome sexual conduct (quid pro quo);
 - (ii) Unwelcome conduct determined by a reasonable person to be so severe, pervasive, and objectively offensive that it effectively denies a person equal access to the Brown's education program or activity (Hostile Environment); and/or
 - (iii) "Sexual assault" as defined in 20 U.S.C. 1092(f)(6)(A)(v), "dating violence" as defined in 34 U.S.C. 12291(a) (10), "domestic violence" as defined in 34 U.S.C. 12291(a)(8), or "stalking" as defined in 34 U.S.C. 12291(a) (30).

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

- **Stalking:** Stalking is a course of conduct on the basis of sex directed at a specific person that would cause a reasonable person to (i.) fear for the person's safety or the safety of others; or (ii.) suffer substantial emotional distress.

For the purposes of this policy, Stalking refers to actions "on the basis of sex" that would constitute Sexual Harassment such as surveillance of a former intimate partner.

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

Stalking includes the concepts of cyber-stalking, a form of Stalking through electronic media such as the internet, social networks, blogs, cell phones, texts, or other similar devices or forms of contact. This definition is prescribed by the Violence Against Women's Act.

Respondent: An individual(s) who has been reported to be the perpetrator of behavior that could constitute Prohibited Conduct.

Report: Information shared with the Title IX Office that includes details of alleged Prohibited Conduct. A report is made when a Complainant, reporting party, or third party seeks information or support measures or informs the University of Prohibited Conduct, but such party is not making a Formal Complaint or pursuing a complaint resolution process to address the alleged Prohibited Conduct.

Support Measures: Non-disciplinary, non-punitive measures provided to a Complainant or Respondent designed to restore or preserve equal access to Brown's programs and activities without unreasonably burdening the other party, including measures designed to protect the safety of all parties and deter future Prohibited Conduct. The Title IX Coordinator will oversee the implementation of support measures that are individualized to respond to the effects of the Prohibited Conduct, and that are appropriate, reasonably available, and free of charge. Support measures may include a no-contact order, counseling, extensions of deadlines or other course-related adjustments, modifications of work or class schedules, campus escort services, changes in work or housing locations, leaves of absence, increased security and monitoring of certain areas of the campus, and other similar measures. Use of support measures is private and is available with or without a Formal Complaint.

Brown will also provide reasonably available support measures for third-party reporters, provided that the accommodations are within the scope of that individual's relationship to Brown University.

5.0 Responsibilities

All individuals to whom this policy applies are responsible for becoming familiar with and following this policy. University supervisors and employees with student oversight duties are responsible for promoting the understanding of this policy and for taking appropriate steps to help ensure and enforce compliance with it.

Title IX Coordinator: The Title IX Coordinator oversees the review of reports and Formal Complaints associated with this policy. The Title IX Coordinator also oversees the implementation of interim actions, support measures, the investigation process, and administration of the hearings associated with alleged violations of this policy. The Title IX Coordinator is also charged with monitoring compliance with Title IX; providing education and training; tracking and reporting annually on all incidents in violation of this policy. *More on the Title IX Coordinator.*

6.0 Consequences for Violating this Policy

A student or employee determined to be responsible for an act of Prohibited Conduct in violation of this policy is subject to discipline as provided for in the Title IX Grievance Procedure.

Applicants, Affiliates, Contractors, or Invitees who violate this policy may have their relationship with Brown University terminated and/or their privilege of being on Brown University premises withdrawn.

Academic Transcripts: Discipline of suspension and expulsion include a permanent notation on the student's official academic transcript that is maintained by the Office of the Registrar. A Respondent's access to a copy of their academic transcript will be suspended, and the University will not release a copy of the Respondent's academic transcript to any other institution or third party during an investigation and adjudication of a Formal Complaint. Requests to release an academic transcript must be submitted to the Title IX Coordinator, who will determine (i.) whether to release the academic transcript; and (ii.) whether a notation indicating that serious disciplinary investigation and/or charges are pending should be included on the academic transcript.

Leave of absence with a Formal Complaint pending: If a Complainant or Respondent takes a leave of absence from Brown after the University has given notice to the Respondent but before a finding or final resolution, the complaint resolution process may be put on hold or continue as appropriate. The Title IX Coordinator will make an individualized assessment to determine whether to hold or continue with the complaint resolution process.

If the process is held due to the leave of absence of a Student Respondent, their transcript will be held in accordance with the process provided for above, and a temporary entry may be made on their academic transcript indicating that the student has taken a leave of absence with serious disciplinary investigation or charges pending.

If the process is held due to the leave of absence of an Employee Respondent, a temporary entry will be made in their personnel file that indicates that the employee has taken a leave of absence with disciplinary charges pending.

Withdrawal/Permanent separation with a Formal Complaint pending: The University will assess the allegations and make an individualized assessment to determine whether to continue or

end the complaint resolution process upon the separation from the University of the Complainant and/or Respondent. A Complainant or Respondent may appeal a decision to dismiss (close) a Formal Complaint:

- If a Complainant withdraws or separates from Brown after the University has given notice to the Respondent but before a finding, the University may dismiss the Formal Complaint or continue as the Complainant.
- If a Student Respondent withdraws from Brown after the University has given notice to the Respondent but before a finding or final resolution, the Formal Complaint may be dismissed, and an entry will be made on their academic transcript maintained by the Office of the Registrar that indicates the Student has withdrawn with a disciplinary investigation and/or charges pending.
- If an Employee Respondent separates or is terminated from Brown after the University has given notice to the Respondent but before disciplinary a finding or final resolution, the Formal Complaint may be dismissed and an entry will be made in their personnel file that indicates that the employee separated with the disciplinary investigation and/or charges pending or employment terminated with a disciplinary investigation and/or charges pending.
- If a Complainant or Respondent withdraws or permanently separates from the University after submitting an appeal on the finding and/or sanction of a hearing panel but before the appeal is decided, the University will dismiss the appeal and uphold the finding of the hearing panel as the final resolution to the complaint. The University may make a retroactive entry on the Respondent's academic transcript or the employee's personnel file indicating the original sanction issued by the hearing panel (if applicable).

The Vice President for Campus Life will hear appeals of dismissal decisions.

7.0 Related Information

Brown University is a community in which individuals are encouraged to share concerns with University leadership. Additionally, [Brown's Anonymous Reporting Hotline](#) allows anonymous and confidential reporting on matters of concern [online](#) or by phone (877-318-9184).

The following information complements and supplements this document. The information is intended to help explain this policy and is not an all-inclusive list of policies, procedures, laws, and requirements.

7.1 Related Policies:

- [Corporation Policy Statement on Equal Opportunity and Nondiscrimination](#)
- [Nondiscrimination and Anti-Harassment Policy](#)
- [Conflict of Interest and Commitment Policy](#)
- [Brown University Code of Student Conduct](#)
- [University Code of Conduct](#)
- [Pregnancy and Parenting Policy](#)
- [Non-Retaliation Policy](#)

7.2 Related Procedures:

- [Title IX Grievance Procedure](#)
- [Sexual Misconduct Grievance Procedure](#)
- [Discrimination and Harassment Standard Operating Procedure for Addressing and Responding to Reports and Complaints](#)

7.3 Related Forms: N/A

7.4 Frequently Asked Questions: N/A

7.5 Other Related Information:

Rhode Island State Law

Behavior that violates this policy also may violate the laws of the local jurisdiction in which the incident occurred and subject a Respondent to criminal prosecution by the applicable jurisdiction. An individual can choose to make a report to external law enforcement at any time, and doing so does not preclude the individual from making a report to the University. Both processes can be pursued if an individual chooses to do so. Brown University encourages individuals to report an incident that may be a violation of Rhode Island state law to external law enforcement. Prompt reporting to external law enforcement is important in a criminal prosecution.

- First-degree Sexual Assault ([RIGL § 11-37-2](#))
- Second-degree Sexual Assault ([RIGL § 11-37-4](#))
- Third-degree Sexual Assault ([RIGL § 11-37-6](#))
- Stalking ([RIGL § 11-59-2](#))
- Cyberstalking and Cyberharassment ([RIGL § 11-52-4.2](#))

8.0 Policy Owner and Contact(s)

8.1 Policy Owner: Vice President for Campus Life and Student Services

8.2 Policy Approved by: President

8.3 Contact Information: Title IX Coordinator

- titleixoffice@brown.edu
- 401-863-2026

9.0 Policy History

9.1 Policy Issue Date: September 2, 2016

9.2 Policy Effective Date: February 20, 2025

9.3 Policy Update/Review Summary:

Previous policy version(s) superseded by this policy:

- Title IX Policy, Effective Date: August 1, 2024
- Sexual Harassment, Sexual Assault, Relationship and Interpersonal Violence, and Stalking Policy, Effective Date: October 18, 2023
- Sexual and Gender-Based Harassment, Sexual Assault, Interpersonal Violence, and

- Stalking Policy, Effective Date: March 19, 2021
- Sexual and Gender-Based Harassment, Sexual Assault, Interpersonal Violence, and Stalking Policy, Last Reviewed Date: February 23, 2021
- Sexual and Gender-Based Harassment, Sexual Assault, Relationship and Intimate Partner Violence, and Stalking Policy, Revision Date: September 2, 2016

APPENDIX B

Title IX Grievance Procedure

1.0 Standard Operating Procedure (SOP) Purpose

The purpose of the Title IX Grievance Procedure is to provide a prompt, fair, and impartial response to Formal Complaints made pursuant to the [Title IX Policy](#) from the initial investigation to the final result. Specifically, this process will address Formal Complaints of Sexual Harassment, Dating Violence, Domestic Violence, Retaliation, Sexual Assault, and Stalking (together referred to as “Prohibited Conduct”).

This procedure is grounded in fairness and support for all parties and includes procedural protections that ensure nondiscrimination, adequate notice, and meaningful opportunities to participate. The University makes the presumption that reports and Formal Complaints are made in good faith and presumes that the Respondent is not responsible for the alleged Prohibited Conduct until a determination is made at the conclusion of this procedure. The implementation of any interim measure does not impact the presumption that a Respondent is presumed not responsible for the alleged Prohibited Conduct.

This procedure is also in compliance with applicable legal requirements including Title IX of the Education Amendments of 1972 and its implementing regulations (34 C.F.R. § 106 et seq); relevant provisions of the Violence Against Women Reauthorization Act; Title VII of the Civil Rights Act of 1964; the Jeanne Clery Campus Safety Act and its implementing regulations; and other applicable federal and Rhode Island state laws.

2.0 SOP

This procedure applies to applicants, students and employees as defined in the policy when:

- the conduct occurs in the United States on property owned, leased, or controlled by Brown University; and/or
- the conduct occurs off campus, in the United States, involving locations, events, or circumstances over which Brown exercises substantial control over both the Respondent and the context in which the alleged Prohibited Conduct occurred, including but not limited to off-campus research, internships, mentorships, summer sessions, clerkships, graduate student fellowships or other affiliated programs.

The Title IX and Gender Equity Office applies the policy defining the Prohibited Conduct that was in effect at the time of the alleged conduct and the procedures that are in effect when the Formal Complaint is filed.

The Title IX and Gender Equity Office currently utilizes two procedures to resolve Formal Complaints:

- The *Title IX Grievance Procedure* is used to resolve Formal Complaints filed under the *Title IX Policy*, which was enacted to comply with the August 2020 Title IX regulations.

- The *Sexual Misconduct Grievance Procedure* is used to resolve Formal Complaints alleging behavior falling within the Sexual Misconduct Policy.

Note: Complaints involving Student Respondents who are participants in Summer@Brown or Pre-College Programs should refer to the policies and procedures governing students enrolled in those programs.

2.1 Initial Assessment

When the Title IX Coordinator receives a report or Formal Complaint of alleged Prohibited Conduct, they will conduct an initial assessment to gain a basic understanding of the nature and circumstances of the allegation. This is ordinarily a meeting, which may be held virtually, with the reporting party or Complainant, if different, where the Title IX Coordinator will provide the reporting party verbal and written information about campus resources and response options. Such information will include, but not be limited to, a written explanation of their rights, disciplinary options on campus, how to report to local law enforcement, the importance of the preservation of evidence, confidentiality parameters, and remedial interim protective and support measures available.

The Title IX Coordinator will use the report and knowledge gathered in this meeting to assess if further risk of harm exists for the reporting party, Complainant, or the campus community; or if the report demonstrates a pattern of Prohibited Conduct involving the same Respondent. If any of these conditions exist, the Title IX Coordinator will take the appropriate interim action.

Upon receipt of a report or other knowledge of alleged Prohibited Conduct, the Title IX Coordinator will promptly contact the individual(s) alleged to be harmed by or subjected to the Prohibited Conduct to: (i) inform them of the availability of Support Measures (as defined below) and existing counseling, health, mental health, victim advocacy, legal assistance, visa and immigration assistance, student financial aid, and other services available; (ii) consider their wishes with respect to support measures; (iii) inform them of the availability of support measures with or without the filing of a Formal Complaint or reporting to law enforcement; (iv) explain the process for filing a Formal Complaint; (v) explain the importance of preserving related evidence because doing so may assist in proving an alleged criminal offense occurred or may be helpful in obtaining a protection order; (vi) explain the options for filing a civil or criminal complaint; and (vii) provide the individual with a written explanation of their rights and options.

Upon receipt of a report or other knowledge of alleged Prohibited Conduct, the Title IX Coordinator may take appropriate actions to provide the Complainant with protective measures. Such protective measures may include no-contact orders, restraining orders, or no-trespass orders, as applicable. If requested, the University will assist Covered Persons in filing/applying for orders of protection, restraining orders, or similar lawful orders issued by a criminal, civil, or tribal court.

Note: In all cases in this process when the term “Title IX Coordinator or other University official” is used, the term shall also mean a designee.

2.2 Filing a Formal Complaint

A Complainant may submit a Formal Complaint at any time while they are enrolled or employed at Brown or attempting to participate in Brown's programs and activities. Filing a Formal Complaint may allow a Complainant to move forward with an informal resolution or a formal process as set forth below. Only a Complainant or the Title IX Coordinator can submit a Formal Complaint. A Complainant who wishes to proceed with this procedure must submit a written and signed document (in hard copy or electronically) that details the incident in which the Prohibited Conduct by the Respondent is alleged.

A Formal Complaint must be submitted to the Title IX Coordinator. A Formal Complaint may be filed with the Title IX Coordinator in person, by mail, or by electronic mail, using the contact information listed below.

Title IX and Gender Equity Office

20 Benevolent Street

titleixoffice@brown.edu

Title IX Coordinator: 401-863-2026

Title IX Case Manager: 401-863-5140

Online reporting form: [Gender Discrimination and Sexual Violence Incident Reporting Form](#)

2.2.1 Initial Assessment of the Formal Complaint

Upon receipt of the Formal Complaint, the Title IX Coordinator will make the following determinations to decide if the allegation(s) fall within the scope of the applicable policy:

- Could the alleged facts set forth by the Formal Complaint, if substantiated, constitute Prohibited Conduct under the Policy?
- Is the Complainant participating in or attempting to participate in an educational program, employment, or other activity of Brown University?
- Is the Respondent a Covered Person as defined in the Policy?
- Did the alleged Prohibited Conduct occur against a person in the United States? and
- Did Brown University exercise substantial control over both the Respondent and the context in which the alleged Prohibited Conduct?

If the answer to any question above is "NO", then the Policy and this procedure do not apply to the Formal Complaint (see "Dismissal of Formal Complaint or Allegations" section 2.9.7 below). If the answer to each question above is "YES", then the Policy and this procedure apply, and the Title IX and Gender Equity Office has the authority to investigate and resolve the Formal Complaint.

2.3 Standard of Evidence

In all stages of the process, Brown University applies the preponderance of the evidence standard (more likely than not) when determining whether the Policy has been violated.

2.4 Time Frame for Reporting

The University will accept a report of Prohibited Conduct at any time, although the University's ability to investigate may be limited by the passage of time. There is no time limit on submitting a Report; however, a Complainant seeking to use this procedure must be participating in or attempting to participate in an educational program, employment, or other activity of Brown at the time of filing a Formal Complaint. The Respondent must also be participating in an educational program, employment, or other activity of Brown at the time at which the Formal Complaint is received.

If the Complainant and/or Respondent is no longer affiliated with Brown (e.g., a report is made after a student is no longer enrolled or has graduated or an employee is no longer employed by Brown), the University will provide reasonably available remedial measures as appropriate, will assist the Complainant in identifying external reporting options, and may take appropriate action to address the Prohibited Conduct.

2.5 False Allegations and Evidence

Deliberately false and/or malicious allegations are a serious offense and may be subject to discipline under appropriate University policy. This does not include allegations that are made in good faith but are ultimately shown to be erroneous or do not result in a Policy violation determination.

Additionally, witnesses and parties knowingly providing false evidence, tampering with or destroying evidence, or deliberately misleading an official conducting an investigation, hearing, or informal resolution may be subject to discipline under appropriate University policies.

2.6 Amnesty

2.6.1 Personal Ingestion of Alcohol and Other Drugs

Brown generally will offer amnesty to student Complainants, Respondents, reporting parties, and witnesses who disclose the personal ingestion of alcohol or other drugs, in violation of [Brown University Code of Student Conduct](#), when making a report of Prohibited Conduct and/or participating in an Informal Resolution Process or Formal Resolution Process. Although amnesty safeguards the individual from a disciplinary notation or finding of responsibility for a policy violation for drugs or alcohol, it does not exempt the University from taking appropriate action to address the conduct and/or mitigate future violations.

2.6.2 Violation of Healthy Brown Public Health Protocols

Brown generally will offer amnesty to Complainants, Respondents, reporting parties, and witnesses who disclose participating in activities that do not adhere to established health protocols when making a report of Prohibited Conduct or participating in an Informal Resolution Process or Formal Resolution Process unless the University determines that there was malicious intent. Although amnesty

safeguards the individual from a disciplinary notation or finding of responsibility for a policy violation, it does not exempt the University from taking appropriate action to address the conduct and/or mitigate future violations.

2.7 Conflict of Interest

The Title IX Coordinator, Investigator, Decision-Makers, and Facilitators of Informal Resolution Processes will be free from conflicts of interest or bias for or against Complainants or Respondents. Such personnel will receive training on how to serve impartially, including avoiding prejudgment of the facts at issue, conflicts of interest, and bias (see “Training and Education” section 3.5 in the Policy).

The Title IX and Gender Equity Office will check for conflict of interest with the parties, Investigator, and Decision-Makers. The parties are expected to promptly report a concern(s) regarding a conflict of interest or bias regarding the above-listed personnel to the Title IX Coordinator once they become aware of the conflict of interest or bias. Complainants and Respondents are expected to promptly report a concern(s) regarding a conflict of interest or bias regarding the Title IX Coordinator to the Associate Vice President for Institutional Equity, Accessibility, and Compliance once they become aware of the conflict of interest or bias. Upon receiving a report of conflict of interest or bias, the University will evaluate the report, and if it is determined that a conflict of interest or bias exists, the University will appoint another individual to serve in the role.

2.8 Informal Resolution

An informal resolution is an alternative to the formal resolution which entails an investigation and adjudication. The informal resolution process is intended to create a facilitated resolution that is acceptable to both the Complainant and Respondent. An informal resolution can be the full and final resolution to a Formal Complaint.

An informal resolution process may occur if:

1. A Complainant submits a Formal Complaint to the Title IX Coordinator;
2. Both the Complainant and Respondent voluntarily agree in writing to participate in the informal resolution process after being provided the Notice of Investigation and Allegation (“NOIA”) (see “Notice of Informal Resolution” section 2.9.1 below); and
3. The Title IX Coordinator determines an informal resolution process is appropriate based on the nature of the allegations in the Formal Complaint.

An informal resolution can be requested by a Complainant or Respondent at any time after a Formal Complaint has been submitted up to the start of a Title IX hearing. The Complainant and Respondent may withdraw from an informal resolution process before agreeing to a resolution. If a Complainant or Respondent chooses to end an informal resolution process prior to agreeing to a resolution, the formal resolution process will resume with respect to the Formal Complaint. Generally, any information obtained during the attempted informal resolution process will not be used in a subsequent investigation of the Formal Complaint.

Engaging in the informal resolution process is not an admission of responsibility for the allegation or an admission of the falsehood of the allegations. The existence of an informal resolution is not viewed as a finding of responsibility against the Respondent.

Once a Formal Complaint has been resolved through an informal resolution process, the matter will be closed. This means allegations resolved through an informal resolution will not advance through the formal resolution process unless the terms of the informal resolution are broken or incomplete. If a term of the informal resolution is broken or incomplete, the information obtained may be submitted as evidence in a subsequent investigation involving the Complainant and/or Respondent.

In all cases, the Title IX Coordinator will have the discretion to determine whether an informal resolution or mediation is appropriate to the circumstances. An informal resolution may include mediation for some limited types of Prohibited Conduct. Mediation may not be an appropriate option for cases involving a report of Sexual Assault and/or relationship and interpersonal violence nor for circumstances involving severe misconduct.

The University will generally allow only one informal resolution per Respondent. Informal resolutions are not permitted between Student Complainants and Employee Respondents.

2.8.1 Notice of Informal Resolution Request

The Title IX Coordinator will provide the Complainant or Respondent written notice of the other party's interest in resolving a Formal Complaint through the informal resolution process. The written notice will include (i) a copy of the Formal Complaint; (ii) a summary of the guidelines for an informal resolution and the participant's rights in the process; (iii) the requirements under which the procedure precludes the parties from resuming a formal resolution process arising from the same allegations; and (iv) any consequences resulting from participating in the informal resolution process, including the records that will be maintained or could be shared.

The Complainant or Respondent will have five (5) business days to respond to the informal resolution request indicating whether they have an interest in participating in the informal resolution process. In the instance when a party does not reply to the notice or a party does not voluntarily agree to participate in the informal resolution process, the University will begin an investigation into the Formal Complaint by proceeding with the formal resolution process.

2.8.2 Privacy of Informal Resolution

The existence of an informal resolution and/or the agreed-upon terms is considered private information maintained in the Title IX and Gender Equity Office. The existence of an informal resolution and/or the agreed-upon terms may be shared with a limited circle of individuals in the University who "need to know" in order to: (i.) assist in implementing the agreed-upon terms; (ii.) monitor the agreed upon terms; (iii.) engage in a risk assessment involving the Complainant or Respondent; (iv.) implement support or protective measures; or (v.) perform University operations.

The Title IX Coordinator may use the information obtained during an informal resolution process as evidence when investigating the Formal Complaint when the terms of an informal resolution are broken or incomplete.

The Title IX Coordinator may also use the information obtained during an informal resolution as evidence when investigating a Formal Complaint if a subsequent allegation of Prohibited Conduct involving the same Respondent is made and the alleged Prohibited Conduct is distinctively similar to the conduct alleged in the informal resolution process. If this occurs, the relevant portion of the Formal Complaint may be shared with an Investigator and the Complainant may be called as a witness.

2.8.3 Acceptance of Responsibility for Impact

As a component of the informal resolution process involving students as the Complainant and Respondent, the Student Respondent must accept responsibility for the harm or impact caused by the Prohibited Conduct alleged in the Formal Complaint. Accepting responsibility for the harm or impact does not mean the Student Respondent accepts responsibility for engaging in Prohibited Conduct as set out in University policy.

A Student Respondent who is interested in accepting responsibility for a policy violation is welcome to do so but should note that accepting responsibility for Prohibited Conduct may be considered factual evidence in a Formal Complaint investigation when an informal resolution is not reached or the terms are broken or incomplete.

2.8.4 Developing Terms of the Informal Resolution

The Complainant and Respondent may propose terms for the informal resolution agreement. The terms should be designed to remedy the adverse effects the alleged Prohibited Conduct has on the Complainant and/or to restore the Complainant's equal access to the programs and activities of Brown. Informal resolutions between faculty and/or staff will include a supervisor, Senior Dean, Office of the Provost, or University Human Resources who may also suggest proposed terms.

The Title IX Coordinator will review the proposed and final terms and will remove those terms that are not permissible under University policy or practice and/or federal or state law. The Title IX Coordinator may consult with the relevant University officials such as a supervisor, Department Chair, Senior Dean, Office of the Provost, Campus Life or University Human Resources when determining the permissibility of a proposed term(s).

After the Title IX Coordinator's review, the parties will have five (5) business days from the date of delivery of the informal agreement to review the terms. They should indicate their willingness to accept all, some, or none of the proposed terms. They may also propose alternative strategies to meet a specific term they reject.

The Title IX Coordinator will send the Complainant and/or Respondent a copy of the other party's response to the proposed terms. The Complainant or Respondent will have a subsequent five (5) business days from the date of delivery of the new terms to consider and respond to the revised terms.

The informal agreement is reached when both parties independently and voluntarily come to an agreement on terms. The above process may be repeated as reasonably necessary to come to a final agreement. Upon agreement and signature (in hard copy or electronically) by both the Complainant and Respondent, the Formal Complaint is considered resolved and closed.

2.8.5 Violations of the Informal Resolution

The Complainant and Respondent must identify and agree upon the consequences for violating the terms of the informal resolution. The Title IX Coordinator will consult with the relevant University officials such as a supervisor, Department Chair, Senior Dean, Office of the Provost, or University Human Resources when determining the permissibility or appropriateness of the proposed consequences. If the consequences for violating the informal resolution are not determined, the matter will continue in the formal resolution process. The Complainant and Respondent cannot agree to suspension, expulsion, or termination as consequences for violating the terms of the informal resolution.

2.8.6 No Right of Appeal

The informal resolution is grounded in the voluntary participation of the Complainant and Respondent. For this reason, there is no right of appeal associated with the informal resolution process.

2.8.7 Time Frame for the Informal Resolution Process

The University cannot promise a definitive timeframe for an informal resolution process as the time to complete the agreement is unique to each set of Complainants and Respondents. Below is an overview of the approximate time associated with the major stages of the informal resolution process after the Title IX Coordinator receives a Formal Complaint. All timeframes set forth in this process may be adjusted at the discretion of the Title IX Coordinator. The Complainant and Respondent will be notified of any delays or extensions of these timeframes and will be provided with a revised timeline to resolve the complaint.

- Written notice of Formal Complaint — Three (3) business days from receipt of the Formal Complaint
- Written notice of a request for informal resolution process — Three (3) business days from receipt of the request from either the Complainant or Respondent
- Drafting of terms — Five (5) business days (this step may be repeated as necessary)
- Review of proposed terms — Five (5) business days (this step may be repeated as necessary)
- Review and sign off on the final terms — Five (5) business days.

2.8.8 Recordkeeping

The Formal Complaint and final informal resolution agreement will be maintained for a period of seven (7) years in accordance with the records retention schedule of the University. Records of supportive measures will be maintained for a minimum period of seven (7) years.

2.9 Formal Resolution Process

A formal resolution process will occur when (i.) a Complainant submits a Formal Complaint and requests to begin the formal resolution process; (ii.) the University engages in an assessment of threat and determines that the Title IX Coordinator should proceed with the formal resolution process because there is reasonable cause to believe that the Respondent poses a significant threat of harm to the health, safety, and welfare of the Complainant or Brown community; or (iii.) the Title IX Coordinator identifies a pattern of alleged Prohibited Conduct involving the same Respondent.

In the event of (ii.) or (iii.) above, the Title IX Coordinator will draft and sign a Formal Complaint in lieu of a Complainant and the formal resolution process will proceed as indicated below.

All parties whose participation is invited or expected in the formal resolution process will be provided written notice of the date, time, location, participants, and purpose of all investigative interviews, hearings, or other meetings with sufficient time to prepare to participate.

2.9.1 Notice to the Respondent(s)

The Title IX Coordinator will provide the Respondent with written Notice of Investigation and Allegation (“NOIA”) along with the Formal Complaint. Written notice will include: (i) information about the availability of an informal resolution process and a formal resolution process, as outlined herein; (ii) notice of the Complainant’s allegations of Prohibited Conduct including sufficient details known at the time (sufficient details include the identities of the parties involved in the incident, if known, the conduct allegedly constituting Prohibited Conduct as defined in the Policy, and the date and location of the alleged of the alleged incident, if known); (iii) a statement that the Respondent is presumed not responsible for the alleged conduct and that a determination regarding responsibility is made at the conclusion of the formal resolution process; (iv) information regarding the parties’ right to have an Advisor of their choice, who may be, but is not required to be, an attorney; (v) a statement that the parties may inspect and review evidence (in accordance with “Evidence Review and Final Investigation Report” section 2.9.2 below); and (vi) a statement that Brown prohibits parties from knowingly making false statements or knowingly submitting false information during any process outlined in this procedure.

Investigative meetings will occur no sooner than three (3) days after the NOIA is issued to allow Respondent sufficient time to prepare to participate.

2.9.2 Investigation

The Title IX Coordinator will appoint one or more Investigators to conduct the fact-finding for the case. The Title IX Coordinator will have the discretion to determine whether the Investigator will be internal (an employee at Brown) or external (a qualified individual outside of the Brown community), or a combination of both internal and external Investigators.

The role of the Investigator will be to gather, assess, and synthesize the relevant evidence in a report that sets forth the facts determined to have occurred. The Investigator has the discretion to determine the relevance of any witness or other evidence and may exclude information from the final investigation report if the information is irrelevant, immaterial, or more prejudicial than informative. The Investigator does not make a final determination as to whether a policy violation has occurred.

The Investigator may include credibility assessments in the final investigation report, where appropriate, based on the Investigator's interviews with the Complainant, Respondent, and witnesses, and review of the material evidence and the basis of those assessments. The credibility assessment may include direct observations, reasonable inferences drawn from the facts, and any consistencies or inconsistencies between the various sources of information.

Complainants and Respondents should be aware that additional allegations of Prohibited Conduct that are different from allegations in the Notice of Investigation and Allegation may arise in the course of the investigation. If an additional allegation is identified during the course of an investigation and the University decides to investigate such allegations, the Title IX Coordinator will issue the Complainant and Respondent notice of the new allegation and amend the Notice of Investigation and Allegation accordingly.

Unauthorized video or audio recordings of investigative interviews are not permitted by the parties or their Advisors.

To protect the privacy of the parties and safeguard the contents of the investigation report, the draft and final investigation report will be sent through an electronic format that limits the parties' ability to edit, download, or print the investigation report. These limitations will be amended as needed to adhere to reasonable accommodation related to a disability that is documented with the University.

To ensure that the Investigator is complying with their role as outlined in these procedures, the Title IX Coordinator will review the investigation report in advance of the parties for thoroughness and accuracy and may return the investigation report to the Investigator in instances where the Investigator does not comply with their role, the Title IX Coordinator questions an initial decision of relevance of evidence, clarification is needed, or the potential policy violation is not addressed in a manner consistent with the Policy definition.

2.9.2.1 Counterclaims

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

Counterclaims determined to have been reported in good faith will be processed using the Sexual and Gender-Based Misconduct Complaint Procedure. Investigation of such claims may take place after the 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.

2.9.2.2 Extensions

A Complainant and/or Respondent may ask the Title IX Coordinator for an extension to a deadline or to pause the investigation or other stages of the formal resolution process. Possible reasons that constitute good cause may include but are not limited to, the absence of a party or a party's Advisor, concurrent law enforcement activity, the need for language assistance or accommodation of disabilities, or other extenuating circumstances outside of the control of the party. Extensions to accommodate an Advisor's schedule, including scheduling of interviews or hearings, will be considered if they do not unduly delay the process, which is considered to be a delay of three (3) or more business days.

Upon granting a party's request for an extension and/or pause, the Title IX Coordinator will provide the Complainant and Respondent with written notice of the temporary delay or limited extension of timeframes and the reason for the extension and/or pause.

2.9.2.3 Witnesses

The Complainant, Respondent, and witnesses are permitted to provide names of potential witnesses to the Investigator. The Investigator will determine which of those potential witnesses, or other persons, may have relevant evidence about the alleged conduct and may request statements, either orally or in writing. Witnesses may include individuals outside of the Brown community.

A witness's participation is voluntary and witnesses do not have a right to an Advisor. Witnesses cannot participate in an investigation and remain anonymous. All witnesses will be asked to review their statements with the Investigator.

2.9.2.4 Evidence

Complainants, Respondents, and witnesses are permitted to provide evidence to the Investigator. Evidence may include text messages, email

exchanges, timelines, receipts, photographs, videos, etc. The Investigator may also gather and consider additional documents, items, or other relevant information.

The Investigator will determine whether the evidence is relevant. Information that does not directly relate to the allegations in the Formal Complaint may be considered irrelevant to the determination of whether the conduct alleged violates the Policy.

- **Pattern Evidence:** A report of Prohibited Conduct that is so distinctively similar and closely resembling the behavior in the Formal Complaint may be considered as evidence. The Investigator may consider this as pattern evidence regardless of whether there has been a prior finding of a Policy violation. Pattern evidence may occur before or after the conduct in question. This information may be deemed relevant to determine whether the conduct alleged violates the Policy and/or to assign appropriate discipline.
- **Character Evidence:** Information that does not directly relate to the facts at issue, but instead reflects upon the reputation, personality, qualities, or habits of an individual is character evidence and will be given lesser weight than information that directly relates to the facts of the case when determining whether the conduct alleged violates the Policy.
- **Prior Sexual History:** Questions and evidence about the Complainant's sexual predisposition or prior sexual behavior are generally not relevant. Questions and evidence about the Complainant's prior sexual behavior are only considered relevant in two circumstances: (i) when the questions and evidence are offered to prove that someone other than the Respondent committed the conduct alleged by the Complainant; or (ii) when the questions and evidence concern specific incidents of the Complainant's prior sexual behavior with respect to the Respondent and are offered to prove consent.
- **Other Disciplinary Cases:** Information about prior, concurrent, or pending campus disciplinary cases or criminal charges involving the Complainant and/or Respondent is typically viewed as irrelevant to the investigation unless determined to be so distinctly similar or contemporaneous such that the other conduct may be considered pattern evidence.
- **Privileged Information:** The University will not require, allow, rely upon, or otherwise permit questions or use of evidence that constitute, or seek disclosure of, information protected under a legally recognized privilege. Notwithstanding the foregoing, if a person holding such a privilege has waived the privilege, then the information may be used during an investigation or live hearing. In gathering evidence, the University will not access, consider, disclose, or otherwise use a party's records that are made or maintained by a

physician, psychiatrist, psychologist, or other recognized professional or paraprofessional acting in the professional's or paraprofessional's capacity, or assisting in that capacity, and which are made and maintained in connection with the provision of treatment to the party, unless the University obtains that party's voluntary, written consent to do so.

2.9.3 Evidence Review and Final Investigation Report

Prior to the completion of the investigation report, the Title IX and Gender Equity Office will send the parties a draft report and all evidence obtained as a part of the investigation that is relevant and directly related to all the allegations raised in the Formal Complaint. Directly related evidence is evidence upon which the University may not intend to rely in reaching a determination regarding responsibility and inculpatory or exculpatory evidence, whether obtained from a party or other source. Information provided to the parties may be redacted as necessary.

The parties will have ten (10) business days from the date of delivery to review the draft report and the evidence and submit a written response to the Title IX Coordinator for the Investigator to consider prior to the completion of the investigation report.

In their response, the Complainant and Respondent may offer additional comments, clarify information previously shared, suggest additional witnesses, question relevance determinations, or identify any other relevant information or evidence to assure the thoroughness and sufficiency of the investigation.

All evidence subject to the parties' inspection and review will be made available at the hearing to give each party an equal opportunity to refer to such evidence during the hearing, including for the purpose of cross-questioning.

Upon consideration of the responses submitted by the parties, the Investigator will finalize the investigation report in a way that fairly summarizes the relevant evidence. The Investigator may request additional information or interview additional witnesses to finalize the document. Once the investigation report is finalized, it will be provided to the Title IX Coordinator.

For both the draft and final investigation reports, the Title IX Coordinator will review the investigation report in advance of the parties for thoroughness and accuracy and may return the investigation report to the Investigator in instances where the Investigator does not comply with their role, clarification is needed, or the potential Policy violation is not addressed in a manner consistent with the Policy definition.

At least ten (10) business days prior to the live hearing, the Title IX Coordinator or designee will send a copy of the finalized investigation report to the parties. Also, at least ten (10) business days prior to the live hearing, the Title IX Coordinator will send a copy of the finalized investigation report to the following trained individuals with roles and responsibilities in the hearing process and determination of the case: (1) the Hearing Officer in a case involving a Student or Staff Respondent, or (2)

the Chair of the Title IX Council, the Hearing Panel, and the Presiding Officer in a case involving a Faculty Respondent. See Sections 2.9.4.1 through 2.9.4.4 below regarding the respective roles and responsibilities of (a) the Hearing Officer (in Student or Staff Respondent cases only) or (b) the Chair of the Title IX Council, the Hearing Panel, and the Presiding Officer (in Faculty Respondent cases only).

The parties may review the finalized investigation report and provide a written response to the Hearing Officer (in Student or Staff Respondent cases only) or the Hearing Panel (in Faculty Respondent cases only) within three (3) business days before the hearing date.

To protect the privacy of the parties and safeguard the contents of the investigation report, the draft and final investigation report will be sent through an electronic format that limits the parties' ability to edit, download, save, or print the investigation report.

Note: The University reserves the right to redact certain information that is not directly related to the allegations.

2.9.4 Hearing

The University conducts a live virtual hearing in which the parties can simultaneously see and/or hear each other. Hearings are recorded by the University only and subject to a proctored review by the parties after the hearing upon request during the pendency of an appeal. The parties may not record the proceedings and no other unauthorized recordings are permitted.

Section 2.9.4.1 below describes the role and responsibilities of the “Hearing Officer,” who presides at the live hearing in a case involving a Student or Staff Respondent. Sections 2.9.4.2 through 2.9.4.4 below describe the respective roles of the “Chair of the Title IX Council,” the “Hearing Panel,” and the “Presiding Officer,” who participate collectively at the live hearing in a case involving a Faculty Respondent. Within this Title IX Grievance Procedure, all references to the “Hearing Officer” shall apply only to a Student or Staff Respondent case, while all references to the “Chair of the Title IX Council,” the “Hearing Panel,” and the “Presiding Officer” shall apply only to a Faculty Respondent case.

The Title IX Coordinator or designee will select a date for the hearing based on the availability of the Chair, Presiding Officer, and the Hearing Panel (for Faculty Respondent cases only) and Hearing Officer (for Student or Staff Respondent cases only) and will consider participants' academic or work schedules when identifying the hearing date. The Title IX Coordinator will not consider an Advisor's schedule when selecting a hearing date. Advisors will need to work with their advisees around scheduling.

- **Timing:** A hearing will be scheduled for a date at least ten (10) business days after the final investigative report is provided to the parties; typically a hearing will be held within fifteen (15) business days from the date that the final investigative report was provided.
- This timeframe may be extended for good cause as provided for in this

Procedure; if granted, the reason for the extension will be shared with the parties in writing.

Note: The University requires the parties to be on camera during their cross-questioning and verbal statement only. The parties will be muted and off-camera during the other phases of the hearing.

2.9.4.1 Hearing Officer (Student and Staff Respondent case only)

A single Hearing Officer presides at the live hearing and decides a case involving a Student or Staff Respondent. The Hearing Officer receives training to hear and decide Formal Complaints investigated under the Policy. The Title IX Coordinator will send the Hearing Officer a copy of the final investigation report at least ten (10) business days before the date of the hearing.

The Hearing Officer is responsible for administering the hearing process, including procedural matters and decisions leading up to the hearing. The Hearing Officer has the discretion and authority to make relevancy determinations during the hearing, including appropriate and inappropriate lines of questioning. The Hearing Officer is also responsible for drafting the determination letter that summarizes the findings, rationale, and outcome.

Following the live hearing, the Hearing Officer shall determine whether or not the Student or Staff Respondent has violated the Policy by a preponderance of the evidence and make the determination regarding responsibility or non-responsibility and discipline (if applicable). The Hearing Officer shall draft a written determination in accordance with Section 2.9.4.8 below.

2.9.4.2 Chair of the Title IX Council

During the live hearing in a case involving a Faculty Respondent, the Chair of the Title IX Council (“Chair”) participates as a trained non-voting member. The Chair is responsible for administering the hearing process and conducting the deliberations process, including procedural matters and decisions leading up to the hearing. The Chair is also responsible for drafting the written determination letter in accordance with Section 2.9.4.8 below which summarizes the hearing’s findings, rationale, and outcome.

2.9.4.3 Hearing Panel (Faculty Respondent cases only)

The Hearing Panel decides cases involving Faculty Respondents. The Hearing Panel is comprised of one to three individuals who receive training to hear Formal Complaints investigated under the policy. The Title IX Coordinator will send the Hearing Panel a copy of the final

investigation report at least ten (10) business days before the date of the hearing. At the conclusion of the live hearing, the Hearing Panel will convene to deliberate and render a decision, by majority vote, regarding whether or not the Respondent has violated the policy by a preponderance of the evidence and determine discipline (if applicable). No member may abstain from voting.

The number and composition of the Hearing Panel are determined by the affiliation of the Respondent (i.e., Faculty). When a Respondent holds multiple relationships to the University, the Respondent's affiliation will be determined by the role they were in when the alleged Prohibited Conduct occurred.

- **Hearing Panel for Faculty Respondent:** A Hearing Panel where both the Complainant and Respondent are faculty will consist of three (3) faculty members drawn from the Title IX Council. If the Complainant is a student or staff member, the Hearing Panel will consist of two faculty (2) and one (1) student or staff member, respectively, drawn from the Title IX Council. The Hearing Panel will deliberate and make a determination regarding responsibility and discipline (if applicable). The Senior Academic Dean of the Respondent or Senior Director of Employee and Labor Relations may be substituted for a three (3) person Hearing Panel in instances in which the Title IX and Gender Equity Office is unable to populate a panel due to urgency, time of year, or conflict of interest.

2.9.4.4 Presiding Officer (Faculty Respondent Cases Only)

During the live hearing in a case involving a Faculty Respondent, the Presiding Officer has the responsibility and authority to ensure the overall decorum of the hearing, including the conduct of the parties and Advisors during cross-examination. The Presiding Officer is also responsible for making relevancy determinations about information that will be considered or not during the hearing, including appropriate and inappropriate lines of questioning. The Presiding Officer does not participate in the Hearing Panel's deliberations nor make any recommendations regarding the determination of the case. The Title IX Coordinator will send the Presiding Officer a copy of the final investigation report at least ten (10) business days before the date of the hearing.

2.9.4.5 Opening Statements

The Complainant and Respondent will have the opportunity to give an opening statement of no more than 10 minutes. If both the Complainant and the Respondent choose to make an opening statement, the Complainant will make an opening statement first, and the Respondent will make an opening statement second.

During the live hearing in a Student or Staff Respondent case, the Hearing Officer will disregard opening statements or any portions thereof that are

more prejudicial than probative, introduce new allegations, or introduce irrelevant or immaterial evidence.

During the live hearing in a Faculty Respondent case, the Presiding Officer will instruct the Hearing Panel to disregard opening statements or any portions therefore made that are more prejudicial than probative, introduce new allegations, or introduce evidence deemed irrelevant or immaterial by the Presiding Officer.

2.9.4.6 Direct Questioning

The Hearing Officer (in Student or Staff Respondent cases) or Hearing Panel (in Faculty Respondent cases) may pose questions to the parties, Investigator, and witnesses (if applicable) to elicit relevant factual information missing from the final investigation report or to clarify any information or exhibits in the report. The presumption is that the Investigator has identified and interviewed all relevant witnesses and supplied the information necessary for the Hearing Officer or Hearing Panel to render a decision and determine Discipline (if applicable).

During direct questioning, the Hearing Officer or Hearing Panel will ask questions (if any) of the Investigator first followed by the Complainant and then the Respondent.

During a hearing involving a Faculty Respondent, the Title IX Council Chair has the discretion to approve or deny requests from the Hearing Panel to gather additional evidence or question a witness during a hearing. The Presiding Officer will make determinations of relevance upon the asking of the question by the Hearing Panel and before the response is given. The hearing process does not allow the Complainant or Respondent to challenge the relevance decision of the Presiding Officer during the hearing or of the Investigator's relevance decisions in the final investigation report. Challenges to relevance decisions by the Hearing Officer or Presiding Officer may be addressed through the appeals process as a material procedural error, not during the live hearing.

2.9.4.7 Cross-Questioning

The hearing provides the Complainant and Respondent the opportunity to pose questions to the other party, Investigator, and witnesses to elicit relevant factual information missing from the final investigation report. The Complainant and Respondent must pose questions through their Advisor and are prohibited from communicating directly with the other party.

The Complainant and Respondent are responsible for developing their specific questions. The University will provide each party with a Process Advisor who can fulfill the function of asking their questions in the event that the party does not have an Advisor. The Process Advisor's role is limited to asking the questions identified by their party, and may, but is not required to, assist their party in developing additional questions.

During cross-questioning, the Respondent will ask questions first and the Complainant will ask questions second.

The Complainant and Respondent must send their anticipated questions and the names of the specific witnesses they would like to cross-examine to the Title IX and Gender Equity Office two (2) business days before the hearing. The questions will be provided to the Hearing Officer or Presiding Officer to prepare for relevancy determinations. The questions will not be shared with witnesses, the other party or Advisor, or the Hearing Panel.

Submitting questions in advance of the hearing does not obligate the party to ask the submitted questions nor does it preclude the party from identifying and asking additional questions at the hearing. The Hearing Officer or Presiding Officer will make a brief determination of relevance before the subject of cross-questioning answers. Relevance determinations made in regard to questions about a Complainant's sexual disposition or prior sexual behavior will be made using the same standard set out above (see "Evidence: Prior Sexual History" section 2.9.2.4).

The hearing process does not allow the Complainant or Respondent to challenge the relevance decision of the Hearing Officer or Presiding Officer during the hearing or the Investigator's relevance decisions in the final investigation report. Challenges to relevance decisions may be addressed through the appeals process.

2.9.4.8 Verbal Closing Statement and Written Statement

The Complainant and Respondent will be granted the opportunity to appear before the Hearing Officer (Student or Staff Respondent cases) or Hearing Panel (Faculty Respondent cases) if they wish to make a verbal closing statement.

During the live hearing in Student and Staff Respondent cases, the Hearing Officer will disregard verbal closing statements or any portions thereof that are more prejudicial than probative, introduce new allegations, or introduce irrelevant or immaterial evidence. If both the Complainant and Respondent choose to make a verbal statement, the Complainant shall appear first, and the Respondent shall appear second.

During the live hearing in a Faculty Respondent case, the Presiding Officer will instruct the Hearing Panel to disregard verbal closing statements or any portion thereof made that are more prejudicial than probative, introduce new allegations, or introduce evidence deemed irrelevant or immaterial by the Presiding Officer. If both the Complainant and Respondent choose to make a verbal statement, the Complainant shall appear first, and the Respondent shall appear second.

2.9.4.9 Written Determination Regarding Responsibility or Non-Responsibility

The Hearing Officer (Student or Staff Respondent cases) or Chair of the Title IX Council (Faculty Respondent cases) will prepare a written determination within five (5) business days from the date of the hearing. The Hearing Officer or Chair may ask for additional time for deliberation or request to pause deliberations in the instance in which additional information is required in order to render a decision. The Title IX Coordinator will notify the parties in writing if additional time or information is needed.

The written determination will include: (i) an identification of the allegations potentially constituting Prohibited Conduct as defined in the Policy; (ii) a description of the procedural steps taken from the receipt of the Formal Complaint through the determination, including any notifications to the parties, interviews with parties and witnesses, site visits, methods used to gather other evidence, and hearings held; (iii) findings of fact supporting the determination; (iv) conclusions regarding the application of the University's Policy to the facts; (v) a statement of, and rationale for, the result as to each allegation, including a determination regarding responsibility, any discipline the University imposes on the Respondent, and whether remedies designed to restore or preserve equal access to Brown's education program or activity will be provided by the University to the Complainant; and (vi) the University's procedures and permissible bases for the Complainant and Respondent to appeal.

In all cases, the Complainant and Respondent will be provided notice of the written determination regarding responsibility simultaneously. The appropriate campus officials such as the Senior Academic Dean, Deans in the Graduate or Medical School, Department Chair, University Human Resources and supervisory personnel, or Deans in the College and Campus Life will receive a copy of the outcome as appropriate.

2.9.4.10 Determining the Appropriate Discipline

If the Hearing Officer (Student or Staff Respondent cases) determines that a Respondent is responsible for one or more violations of the Policy, it will then impose an appropriate discipline. If the Hearing Panel (Faculty Respondent cases) determines that a Respondent is responsible for one or more violations of the Policy, it will recommend the appropriate discipline to the Provost as described in 2.9.4.11. The Hearing Officer shall consider, but is not limited to, the following factors in determining an appropriate discipline:

- Whether or not the circumstances suggest there is an increased risk of the Respondent committing additional acts of sexual violence or other violence (whether there have been other sexual violence Complaints about the same Respondent, whether the Respondent has a history of violence, whether the Respondent threatened further sexual violence or other violence against the Complainant or others);
- Whether or not the circumstances suggest there is an increased risk of future acts of Prohibited Conduct under similar circumstances (whether the circumstances reveal a pattern of perpetration, for instance via illicit use of drugs or alcohol, at a given location, or by a particular group);
- Whether or not the Prohibited Conduct was perpetrated with a weapon or had other aggravating considerations;
- Whether the Respondent, upon return to campus, would be likely to pose a threat to the safety and/or well-being of the Complainant and/or the Brown University community generally, and if so, the nature and extent of the threat and steps to effectively mitigate the impact;
- Whether the Respondent has been found responsible for prior violations of Brown policies;
- The impact of the conduct on the Brown University community, and the need for any discipline or remedies to eliminate, prevent, or address the existence of any hostile environment caused in the Brown University community or to maintain a safe and respectful environment conducive to learning, working, and living; and
- Any other mitigating, aggravating, or compelling circumstances in order to reach a just and appropriate resolution in the case.

If a Student Respondent is found responsible and the discipline includes suspension or expulsion and the Respondent appeals, the Behavioral Assessment and Response Team will meet to determine if the Respondent must be immediately removed from campus housing, restricted in their movements on campus (e.g., only able to attend classes and labs), or barred completely from campus during the entirety of the appeal process. Such removal or restriction will only be imposed if there is reasonable cause to believe that the Respondent poses a significant threat of harm to the health, safety, and welfare of the Complainant or others.

In cases of expulsion or termination: Once the appeal deadline has passed or an expulsion or termination is upheld by an appeal panel, the Respondent's enrollment or employment will end and the Respondent must vacate campus immediately.

In cases of suspension of a Student Respondent: Once the appeal deadline has passed or a suspension is upheld by an appeal panel, the start of the Respondent's suspension will be determined by the date on which the final decision is made. Suspensions imposed before the end of the sixth

week of classes will begin immediately and apply to the current semester. Suspensions imposed after the sixth week of classes will apply to the next semester. The University may impose interim actions, as appropriate, on the Student Respondents whose suspension will begin in the upcoming semester.

2.9.4.11 Determining Discipline for Faculty Respondents

The Hearing Panel's written decision finding that the faculty Respondent violated the Policy and recommending Discipline will be forwarded to the Provost within two (2) days of the decision being shared with the Complainant and Respondent. The Provost shall consider the written decision setting out the Hearing Panels finding and recommendation and may consider any part of the record before the Hearing Panel that the Provost deems appropriate. The Provost may meet with the Hearing Panel to discuss their recommendation and may afford the Complainant and Respondent the opportunity to discuss the Hearing Panel's recommendation. The Provost shall also consider the factors set forth in Section 2.9.4.8.

If the Provost determines that termination of a term appointment or revocation of tenure is the appropriate Discipline for violating the Policy, then such a determination will be a recommendation to the President that such Discipline be imposed and will be forwarded to the President in writing for consideration. The President will consider any recommendation by the Provost to terminate a faculty Respondent's term appointment or to revoke a faculty Respondent's tenure. In considering the Provost's recommendation, the President may also review the written decision setting out the Hearing Panel's finding and recommendation and consider any part of the record before the Hearing Panel that the President deems appropriate. The President may afford the Complainant and Respondent the opportunity to discuss the recommendation. If the President determines that the circumstances require a recommendation to the Corporation that the faculty Respondent be dismissed during either a term appointment or tenure, the President shall so recommend in writing to the Corporation. The Corporation's decision on the President's recommendation will be final.

If the Provost determines that Discipline other than termination of a term appointment or revocation of tenure is the appropriate Discipline for violating the Policy is appropriate, then that Discipline will be final unless either Party appeals. The Provost's determination will be communicated simultaneously in writing to the Parties, the President, the appropriate senior dean, and the Chair of the Faculty Executive Committee or Chair of the Medical Faculty Executive Committee (as appropriate).

The Provost will complete the process for recommending/imposing Discipline as set forth in this section within ten (10) days of receipt of the Hearing Panel's written decision.

2.9.4.12 Right of Appeal

The Complainant and Respondent both have the right to appeal a determination of responsibility on the limited grounds of (i.) a procedural irregularity that affected the outcome of the complaint; (ii.) new evidence that was not reasonably available at the time the determination regarding responsibility for the Formal Complaint was made that could affect the outcome of the matter; (iii.) the Title IX Coordinator, Investigator(s), or Decision-Maker(s) had a conflict of interest or bias for or against Complainants or Respondents generally or the individual Complainant or Respondent that affected the outcome of the matter, or (iv.) a determination regarding responsibility and/or Discipline that is clearly contrary to the weight of the evidence.

Written requests for appeal must be submitted to the appropriate University personnel (see below) within five (5) business days following delivery of the written determination regarding responsibility. Written requests for appeals submitted by one party will be shared with the other party. Each party may respond in writing to any appeal submitted by the other party. Written responses to an appeal must be submitted within five (5) business days following delivery of the notice of the written appeal.

Appeals are heard by the Provost in cases with a Faculty Respondent, the Vice President for Human Resources in cases with a Staff Respondent, and a three (3) member appeal panel drawn from the Title IX Council in cases with a Student Respondent. The individuals hearing appeals are referred to in this Grievance Procedure as Appeal-Decision Makers. The Appeal Decision-Maker's responsibility will be strictly limited to determining if the written appeal meets the limited grounds on which an appeal is submitted. The appeal will be granted if the Appeal Decision-Maker finds that the grounds for appeal are met. Otherwise, the appeal will be denied. If the appeal is denied, the matter is closed and the original written determination regarding responsibility and Discipline, if applicable, stands as the final decision.

There are two possibilities in the event that an appeal is granted. The Appeal Decision-Maker may, at their discretion: (i.) Remand the case to the original Hearing Officer (Student or Staff Respondent cases) or a new Hearing Panel (Faculty Respondent cases) and provide instructions regarding the nature and extent of its consideration. The Hearing Officer or Hearing Panel will promptly consider the matter consistent with those instructions. Following consideration, the finding of the Hearing Officer or Hearing Panel and the Discipline imposed by the Hearing Officer or Hearing Panel will be final and not subject to further appeal; or (ii.) Modify the determination and/or Discipline consistent with the Appeal Decision-Maker's findings. Upon a determination of the outcome of the appeal, the Appeal Decision-Maker will issue a written decision describing the result of the appeal and the rationale for the result. The Appeal Decision-Maker's written decision will be provided simultaneously to both the Complainant and the Respondent. All determinations made by the Appeal Decision-Maker are final and not subject to further appeal or review.

If a Complainant or Respondent withdraws or permanently separates from the University after submitting an appeal on the finding and/or Discipline but before the appeal is decided, the University will dismiss the appeal and uphold the determination regarding responsibility made by the Hearing Panel or Hearing Officer as the final resolution to the complaint.

2.9.5 Time Frame of the Formal Resolution Process

The University makes every reasonable effort to ensure that complaints are resolved as expediently and efficiently as possible. Many complaints may require extensive review, and time frames will vary depending on the complexity of the investigation and the severity and extent of the alleged misconduct. A formal resolution process may take approximately 90 business days. Time frames may be extended for good cause as necessary to ensure the integrity and completeness of the process. The reasons for the extension of the time frame also include, but are not limited to: compliance with a request by law enforcement; a limited accommodation of the availability of Parties, their Advisors, and witnesses; students on leave; exam periods, school breaks or vacations; and accounting for complexities of a specific investigation, including the number of witnesses and volume of information provided by the Parties, whether there is a counterclaim or allegations of retaliation, and the severity and extent of the alleged misconduct.

To enable prompt and efficient resolution of complaints, the Title IX and Gender Equity Office expects that any individual involved in the disciplinary process will respond to outreach from the Office within two (2) business days. In addition, the Office expects its deadlines to be honored absent extraordinary circumstances. Requests for deadline extensions will be considered by the Office on a case-by-case basis.

Below is an overview of the approximate time associated with the major stages of the formal resolution process after the Title IX Coordinator receives a Formal Complaint. All timeframes set forth in this process may be adjusted at the discretion of the Title IX Coordinator. The Complainant and Respondent will be notified in writing of any delays or extensions of these timeframes and will be provided with a revised timeline to resolve the Formal complaint.

- Notice to the Respondent — approximately five (5) business days from receipt of the Formal Complaint
- Investigation — approximately forty-five (45) business days
- Draft Investigation Report Review — Ten (10) business days from delivery of the draft investigation report, the parties must provide the Title IX Coordinator with their written response.
- Finalize the Investigation Report — approximately ten (10) business days
 - › During these ten (10) business days, prior to the hearing, the final investigation report will be sent to the Hearing Officer (Student Respondent cases) or Title IX Council Chair, Hearing Panel, and Presiding Officer (Faculty or Staff Respondent cases), and the parties.

- Hearing Officer or Hearing Panel Deliberation – Five (5) business days from the last day of the hearing, the Hearing Officer or Hearing Panel will issue their written determination regarding responsibility to the Title IX Coordinator.
- Right of Appeal – Five (5) business days from the delivery of the written determination regarding responsibility, the Complainant or Respondent may file an appeal
- Appeal Review – Five (5) business days from the time the appeal is filed, the appeal Decision-Maker(s) will issue their written determination regarding the outcome of the appeal

2.9.6 Information Sharing

The University may share the Formal Complaint, investigation report, and/or determination regarding responsibility with a limited circle of individuals within the University who “need to know” in order to assist in (i.) the review, investigation, and resolution of the report or Formal Complaint; (ii.) the implementation of support or protective measures; (iii.) the implementation of the determination regarding responsibility and/or Discipline, or (iv.) other disclosures necessary to fulfill University operations.

Although Brown will make all reasonable efforts to maintain privacy and confidentiality, the University will not restrict the ability of either party to discuss the allegations under investigation or to gather and present relevant evidence. However, parties should be aware that the prohibition of retaliation continues to apply and certain conduct could constitute a violation of federal or state privacy laws.

2.9.7 Dismissal of Formal Complaint or Allegations

The University is required to dismiss a Formal Complaint or allegations therein if the conduct alleged in the Formal Complaint: (i.) would not constitute Prohibited Conduct as defined in the Policy, even if proved; (ii.) did not occur in Brown’s education program or activity; or (iii.) did not occur against a person in the United States.

The University may dismiss a Formal Complaint or allegations therein, at any time prior to a determination regarding responsibility, if (i.) the Complainant notifies the Title IX Coordinator in writing that the Complainant would like to withdraw the formal complaint or any allegations therein (the Title IX Coordinator has the discretion to approve or deny such requests, and will strongly consider the Complainant’s request); (ii.) the Respondent is no longer enrolled or employed at the University; or (iii.) specific circumstances prevent Brown from gathering evidence sufficient to reach a determination as the Formal Complaint or allegations therein.

Such dismissal does not preclude action under another University process. The Formal Complaint and the investigation report may be referred to an alternative policy/procedure, Code of Conduct, or University official.

Upon a decision to dismiss some or all of the allegations in a Formal Complaint, the Complainant and Respondent will simultaneously be sent written notice with the reason(s) for the dismissal.

2.9.7.1 Right to Appeal

The Complainant and/or Respondent have the right to appeal a decision to dismiss a Formal Complaint and any allegations therein on the limited grounds of: (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 the dismissal of the Formal Complaint was made that could affect the outcome of the matter; or (iii) the Title IX Coordinator, Investigator(s), and/or Decisions-Maker(s) had a conflict of interest or bias for or against Complainants or Respondents generally or the individual Complainant or Respondent that affected the outcome of the matter.

The Associate Vice President for Institutional Equity, Accessibility, and Compliance will hear appeals for dismissal

An appeal of a mandatory or discretionary dismissal must be submitted to the Associate Vice President for Institutional Equity, Accessibility, and Compliance within five (5) business days from the written notice of the decision to dismiss. Written requests for appeals submitted by one party will be shared with the other party. Each party may respond in writing to any appeal submitted by the other party to the Associate Vice President for Institutional Equity, Accessibility, and Compliance. Written responses must be submitted within five (5) business days following delivery of the notice of the written appeal.

Upon a determination of the outcome of the appeal, the Associate Vice President for Institutional Equity, Accessibility, and Compliance will issue a written decision describing the result of the appeal and the rationale for the result. The Associate Vice President for Institutional Equity, Accessibility, and Compliance will provide the written decision simultaneously to both the Complainant and Respondent. All appeal determinations are final and not subject to further appeal or review.

2.10 Recordkeeping

Brown University will document and maintain the following records, in accordance with the records retention schedule of the University and the Title IX regulations, for a period of seven (7) years:

- All materials used to train Title IX Coordinator(s), Deputy Title IX Coordinators, Investigator(s), Decision-Maker(s), and Facilitator(s) of Informal Resolution Processes. The University will make these training materials publicly available on the Title IX and Gender Equity Office's website;
- Any actions, including any supportive measures, taken in response to a report or formal complaint of sexual harassment. In each instance of actions taken in response

to Title IX reports or formal complaints, the University will document the basis for its conclusion that its response was not deliberately indifferent, and document that it has taken measures designed to restore or preserve equal access to the University's education program or activity. If the University does not provide a Complainant in a Title IX case with supportive measures, then the University must document the reasons why such a response was not clearly unreasonable in light of the known circumstances;

- Any informal resolution process and the results therefrom;
- Each formal resolution process investigation, any audio or audiovisual recording or transcript of the live hearing, and any written determination regarding responsibility;
- Any Discipline imposed on the Respondent, and any remedies provided to the Complainant designed to restore or preserve equal access to the University's education program or activity; and
- Any appeal and the result therefrom.

2.11 Use of an Advisor and Advisor's Role

The parties may each have an Advisor of their choice present with them for all meetings and interviews within the resolution process if they choose. The parties may select whomever they wish to serve as their Advisor as long as the Advisor is eligible and available to abide by the time periods and deadlines stated in this process. *

Choosing an Advisor who is also a witness in the process creates a potential for bias and conflict of interest. A party that chooses an Advisor who is also a witness can anticipate that issues of potential bias will be explored by the Hearing Panel.

The 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.

A pool of Brown University faculty and staff are trained as process advisors. Process Advisors are available to the Complainant or Respondent upon request, subject to the Process Advisor's availability. There is no requirement that the Advisor be chosen from this pool or be an individual from the Brown University community.

**Note: Available means the party cannot insist on an Advisor who simply doesn't have the inclination, time, or availability. Also, the Advisor cannot have institutionally conflicting roles, such as being a Title IX Administrator who has an active role in the matter or a supervisor who must monitor and implement discipline.*

a. 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 inside or outside of the Brown University community.

b. Advisor's Role

The parties may be accompanied by their Advisor in all meetings, interviews, and any hearing at which the party is entitled to be present, including intake and interviews. If a

party has more than one Advisor, only one Advisor may attend each meeting, interview, or hearing. Advisors should help the parties prepare for each meeting and are expected to advise ethically, with integrity, and in good faith.

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

An Advisor's role is limited during the hearing. During a hearing, Advisors may ask questions on behalf of the party during the cross-questioning phase of the hearing. An Advisor's active role is limited to the questioning during the cross-questioning phase only. An Advisor cannot speak to the Hearing Panel or other participants in the hearing or ask questions in any other step of the hearing unless it is to request a brief break to provide private consultation to their party.

c. Advisor's Violations of University Policy

All Advisors are subject to the same applicable University policies and procedures, whether they are attorneys or not. Advisors are expected to advise their advisees without disrupting proceedings. Advisors should not address University Officials in a meeting or interview unless invited to (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-Makers.

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 sharing notes during any meeting, interview, or hearing. For longer or more involved discussions, the parties and their Advisors should ask for breaks to allow for private consultation.

Any Advisor who does not comply with their role in this process will be warned only once. If the Advisor continues to disrupt or otherwise fails to respect the limits of the Advisor role, the meeting will be ended, and/or other appropriate measures implemented. Subsequently, the Title IX Coordinator will determine how to address the Advisor's non-compliance and future role.

d. Sharing Information with the Advisor

The Title IX and Gender Equity Office staff will not directly communicate with or share documentation and evidence related to the allegations with a party's Advisor unless the party has provided the University with permission to do so. Parties who do not provide such permission to the University may share information directly with their Advisors if they wish. Doing so may help the parties participate more meaningfully in the resolution process.

e. 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 (except expert witnesses), disclosed publicly, or used for purposes not explicitly authorized by the University. Brown

University may seek to restrict the role of an Advisor who does not respect the sensitive nature of the process or who fails to abide by the University's privacy expectations.

f. Expectations of an Advisor

The University generally expects Advisors to adjust their schedule to allow them to attend meetings when planned but may change scheduled meetings to accommodate an Advisor's inability to attend upon a showing of good cause if doing so does not result in an unreasonable delay.

The University may also make reasonable provisions to allow an Advisor who cannot attend in person to attend a meeting by telephone or video conferencing.

g. 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 of the identity of their Advisor at least two (2) business days before the date of their first meeting with the Investigator (or as soon as possible if a more expeditious meeting is necessary or desired). The parties are expected to notify the Title IX Coordinator promptly if they change Advisors at any time.

2.12 Prohibition on Recording

Parties, Advisors to parties, and witnesses are prohibited from audio or video recording any part of the resolution proceedings. The resolution proceedings include but are not limited to (i) telephone calls and virtual or in-person meetings with any member of the Title IX and Gender Equity Office staff; (ii) telephone calls and virtual or in-person interviews or meetings with the Investigator; and (iii) the hearing.

Allegations of non-compliance will be reviewed by the Office of Student Conduct and Community Standards for students, University Human Resources for staff, and the Office of the Provost for faculty and may result in discipline, up to and including separation from the University. The parties are responsible for their Advisors' compliance with this provision and may be subject to discipline for any violation by their Advisor.

Students with disabilities who would like to request a reasonable accommodation should contact Student Accessibility Services at SAS@brown.edu or (401) 863-9588. Faculty and staff with disabilities who would like to request a reasonable accommodation should contact University Human Resources and [visit this website](#) for more information.

3.0 Definitions

For the purpose of this SOP, the terms below have the following definitions:

Advisor: An Advisor is an individual of the Complainant's or Respondent's choosing including an attorney who provides support during the complaint process. More on the role and responsibility of an Advisor can be found above (see "Use of an Advisor and Advisor's Role" section 2.11).

Administrative Leave: Administrative leave is the process where the institution places an Employee on interim work, supervision, leadership, or teaching suspension after the filing of a Formal Complaint against the Employee.

Coercion: Coercion is verbal and/or physical conduct, including intimidation, unwanted contact, and express or implied threats of physical, emotional, or other harm, that would reasonably place an individual in fear of immediate harm and that is employed to compel someone to engage in sexual contact.

Complainant: A Complainant is the individual(s) who is alleged to be the victim of behavior that could constitute Prohibited Conduct. A Complainant seeking to use the Title IX Grievance Procedure associated with this policy must be participating in or attempting to participate in an educational program, employment, or activity of Brown at the time in which the Formal Complaint is submitted.

Consent: Consent is an affirmative and willing agreement to engage in specific forms of sexual contact with another person. Consent requires an outward demonstration, through mutually understandable words or actions, indicating that an individual has freely and affirmatively chosen to engage in sexual contact. Consent cannot be obtained through (1) the use of coercion or force, or (2) by taking advantage of the incapacitation of another individual.

Silence, passivity, incapacitation from alcohol or drugs, or the absence of resistance does not imply consent. It is important not to make assumptions; if confusion or ambiguity arises during a sexual interaction, it is essential that each participant stops and clarifies the other's willingness to continue.

Consent can be withdrawn at any time. When consent is withdrawn, sexual activity must cease. Prior consent does not imply current or future consent; even in the context of an ongoing relationship, consent must be sought and freely given for each instance of sexual contact. An essential element of consent is that it be freely given. Freely given consent might not be present, or may not even be possible, in relationships of a sexual or intimate nature between individuals where one individual has power, supervision, or authority over another.

In evaluating whether consent was given, consideration will be given to the totality of the facts and circumstances, including but not limited to the extent to which a Complainant or reporting party affirmatively uses words or actions indicating a willingness to engage in sexual contact, free from coercion; whether a reasonable person in the Respondent's position would have understood such person's words and acts as an expression of consent; and whether there are any circumstances, known or reasonably apparent to the Respondent, demonstrating incapacitation of the Complainant.

Covered Persons:

- **Applicants:** Individuals who have expressed an interest in applying or have submitted an application for employment or enrollment as a student.
- **Contractors:** Independent contractors, vendors, or other third parties contractually obligated to perform services for Brown University.
- **Employees:** Individuals employed by Brown University, including faculty, affiliates, visiting faculty, postdoctoral fellows, and all staff (including all exempt and non-exempt, bargaining unit, and senior administrative positions), as well as those physicians and health scientists who are not employed by Brown University but have Brown University faculty, affiliate, postdoctoral, or house staff appointments for the purpose of teaching and/or research in the Division of Biology and Medicine.

- **Invitees:** Visitors or guests of Brown University.
- **Students:** Individuals enrolled in the College, the Graduate School, the Warren Alpert Medical School, the School of Public Health, the School of Engineering, and/or the School of Professional Studies.
- For RISD students who are not dually enrolled at Brown, the Title IX and Gender Equity Office will work with the RISD Title IX Office to determine jurisdiction.

Discipline: A Respondent who is found responsible for violating the Policy is subject to one or more of the following disciplinary actions:

- A verbal or written warning
- A required letter of apology
- Probation (as defined in the Student Conduct Procedures)
- Probation with Restrictions (as defined in the Student Conduct Procedures)
- Suspension
- Expulsion
- Recommendation to the University to withhold or revoke a degree
- Academic transcript notation
- Restitution for damage to property
- Reflection or research papers or other academic assignments
- Letters of apology
- Restorative circles
- Attending or presenting educational programs or training
- No Contact Orders
- Referrals to other offices and resources on campus
- Administrative leave with or without pay
- Termination of employment
- Termination of relationship with the University
- A change in job description

Emergency Removal: Emergency removal is the process where the University places a Respondent on an interim academic suspension, interim leave of absence, and/or interim removal from campus. The Title IX Coordinator will bring reports that may necessitate an emergency removal to the Behavioral Assessment and Response Team in the case involving Student Respondents or convene a risk assessment group for cases involving Employee Respondents. The Behavioral Assessment and Response Team or risk assessment group will conduct an individualized safety and risk analysis to determine whether the Respondent poses an immediate threat of harm to the health, safety, and welfare of others or the University community.

If the Behavioral Assessment and Response Team determines that an emergency removal of a Student Respondent is warranted, it will recommend that action to the Associate Vice President for Campus Life and Dean of Students who will decide whether to implement the emergency removal and provide the Student Respondent with notice. Student Respondents may appeal emergency removal decisions in writing to the Vice President for Campus Life.

If the Behavioral Assessment and Response Team determines that an emergency removal of an Employee Respondent is warranted, it will recommend that action to the Department HR Business Partner) who will decide whether to implement the emergency removal and provide the Employee Respondent with notice. Employee Respondents may appeal emergency removal decisions in writing to the Vice President for Human Resources.

Brown may remove a Respondent on an emergency basis with or without the completion of a Title IX resolution process.

Force: Force is the use or threat of physical violence to overcome an individual's freedom of will to choose whether or not to participate in sexual contact.

Formal Complaint: A written and signed document submitted by a Complainant (or the Title IX Coordinator in lieu of a Complainant) alleging that a Covered Person has engaged in conduct prohibited by this policy. A Formal Complaint should include the identities of the parties involved (if known), the Prohibited Conduct alleged, the date and location of the alleged incident (if known), and the details of the incident. The Formal Complaint will be shared with the Respondent and the Investigator upon the initiation of an investigation.

Incapacitation: An individual who is incapacitated lacks the ability to make informed judgments and cannot consent to sexual contact. Incapacitation is the inability, temporarily or permanently, to give consent because an individual is mentally and/or physically helpless, asleep, unconscious, or unaware that sexual activity is occurring. Mentally helpless means a person is rendered temporarily incapable of appraising or controlling one's own conduct. Physically helpless means a person is physically unable to verbally or otherwise communicate consent or unwillingness to an act.

Where alcohol or other drugs are involved, incapacitation is a state beyond impairment or intoxication. Where alcohol or other drugs are involved, evaluating incapacitation requires an assessment of how the consumption of alcohol and/or drugs affects a person's: decision-making ability; awareness of consequences; ability to make informed, rational judgments; capacity to appreciate the nature and quality of the act; or level of consciousness. The assessment is based on objectively and reasonably apparent indications of incapacitation when viewed from the perspective of a sober, reasonable person.

Interim Action: A course of action taken by the University in response to a report of Prohibited Conduct. These measures may be both restorative (designed to address a Complainant's safety and well-being and continued access to educational opportunities) and remedial (involving action against a Respondent without unreasonably burdening a Respondent). Interim actions may include housing relocation, on-campus housing restriction, change in work location or modification of work hours, restricted access to certain buildings or locations of campus, course reassignment or shift to remote course access, interim suspension and/or interim removal from campus, or interim administrative leave of absence. Interim action may be taken with or without a Formal Complaint or the implementation of a complaint resolution process and is individualized to protect the safety of all parties, the broader campus community, and/or prevent future Prohibited Conduct.

Prohibited Conduct: Prohibited Sexual Harassment means conduct on the basis of sex that includes one of the following - Dating Violence, Domestic Violence, Prohibited Intimate Relationships, Retaliation, Sexual Assault, Sexual Harassment, and Stalking, as defined herein.

- **Dating Violence:** Dating violence is violence committed by a person who is or has been in a social relationship of a romantic or intimate nature with the victim where the existence of such relations shall be determined based on a consideration of the following factors: (i.) the length of the relationship; (ii) the type of relationship; (iii) the frequency of interaction between the persons involved in the relationship. This definition is prescribed by the 2014 Violence Women's Act, 34 U.S.C. § 12291(a)(10).

- **Domestic Violence:** Domestic Violence is a felony or misdemeanor crime of violence committed (i.) by a current or former spouse or intimate partner of the victim; (ii.) by a person with whom the victim shares a child in common; (iii.) by a person who is cohabitating with, or has cohabitated with, the victim as a spouse or intimate partner; (iv.) 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 (v.) by any other person against an adult or youth victim who is protected from that person's acts under the domestic or family violence laws of the jurisdiction in which the crime of violence occurred.
 - **Economic Abuse:** The term 'economic abuse', in the context of domestic violence, dating violence, and abuse in later life, means behavior that is coercive, deceptive, or unreasonable controls or restrains a person's ability to acquire, use, or maintain economic resources to which they are entitled, including using coercion, fraud, or manipulation to
 - (1) Restrict a person's access to money, assets, credit, or financial information;
 - (2) Unfairly use a person's personal economic resources, including money, assets, and credit, for one's own advantage; or
 - (3) Exert undue influence over a person's financial and economic behavior or decisions, including forcing default on joint or other financial obligations, exploiting powers of attorney, guardianship, or conservatorship, or failing or neglecting to act in the best interests of a person to whom one has a fiduciary duty.
 - **Technological Abuse:** An act or pattern of behavior that occurs within domestic violence, sexual assault, dating violence, or stalking and is intended to harm, threaten, intimidate, control, stalk, harass, impersonate, exploit, extort, or monitor, except as otherwise permitted by law, another person, that occurs using any form of technology, including but not limited to: internet-enabled device, online spaces and platforms, computers, mobile devices, cameras and imaging programs, apps, location tracking device, or communication technologies, or any other emerging technologies.

This definition is prescribed by the 2014 Violence Women's Act, 34 U.S.C. § 12291(a)(10).

- **Prohibited Intimate Relationships:** No Employee shall request or accept sexual favors from or engage in a romantic, sexual, or intimate relationship with any Brown University undergraduate Student. This prohibition includes intimate relationships between student supervisors and supervisees, undergraduate, graduate, or medical student teaching or research assistant, teaching fellow, or proctor, and any undergraduate student who is enrolled in a course or section taught by that individual or otherwise subject to that individual's academic supervision.

Relationships of a sexual or intimate nature between Employees and graduate and medical Students where the Employee has power, supervision, or authority over the student are prohibited. No faculty, graduate or medical Student, medical resident or fellow, postdoctoral fellow or associate, teaching or research assistant or fellow, or proctor shall request or accept sexual favors from or engage in a romantic, sexual, or intimate relationship with any graduate or medical Student who is enrolled in a course or section taught by that individual or otherwise subject to that individual's academic supervision.

Academic supervision includes teaching, advising, supervising research, serving on a dissertation or other academic committee, grading, and/or having an influence upon funding and/or academic progress, and/or otherwise occupying a position of influence or power over a Student's academic program.

Even when both parties have consented at the outset to the development of such a relationship, it is the person in the position of greater authority who may be investigated for or charged with Prohibited Conduct.

Pre-existing relationships of a sexual or intimate nature with a Student or relationships between individuals who are faculty and staff must be disclosed on the Conflict of Interest Form and may require a Management Plan.

- **Retaliation:** Retaliation is intimidation, threats, coercion, or discrimination against any individual for the purpose of interfering with any right or privilege secured by Title IX or because the individual has made a report or complaint, testified, assisted, participated, or refused to participate in any manner in an investigation, proceeding, or hearing under the Title IX Grievance Procedure. Retaliation includes charges against an individual for code of conduct violations that do not involve sex discrimination or sexual harassment but arise out of the same facts or circumstances as a report or complaint of sex discrimination, or a report or formal complaint of sexual harassment, for the purpose of interfering with any right or privilege secured by Title IX.
- Any retaliatory action taken by an individual or the University, directly or indirectly, against a person who has made a report, filed a complaint, or participated in an investigation is prohibited. This prohibition against retaliation protects Complainants, Respondents, reporting parties, witnesses, Hearing Panelists, Hearing Officers, Decision-Makers, Advisors, Investigators, and other individuals who provide information relating to a Title IX investigation or participate in a complaint process associated with this policy. Complaints alleging retaliation may be filed in accordance with the Sexual Harassment, Sexual Assault, Relationship and Interpersonal Violence, and Stalking (Title IX) Policy and Title IX Grievance Procedure.
- **Sexual Assault:** Sexual assault is defined as a sexual act directed against another person, without the consent of the other person, including instances where the target is incapable of giving consent due to age or temporary or permanent mental or physical incapacity. Sexual Assault is the umbrella term for actions that constitute rape, fondling, incest, and statutory rape. This definition is prescribed by the 2014 Violence Against Women's Act as defined in the Uniform Crime Reporting (UCR) Program's National Incident-Based Reporting System (NIBRS).
 - **Fondling:** Forcible or non-forcible touching of the private body part (breast, buttocks, groin, genital, or other intimate part) of another person for the purpose of sexual gratification without consent.
 - **Incest:** Sexual intercourse between persons who are related to each other within the degrees wherein marriage is prohibited by law. This definition is prescribed by the 2014 Violence Against Women's Act as defined in the Uniform Crime Reporting (UCR) Program's National Incident-Based Reporting System (NIBRS).
 - **Rape:** Attempted or completed anal or vaginal penetration of another person, no matter how slight, by a body part or object without consent and/or completed or attempted oral penetration by a sex organ of another person.

- **Statutory Rape:** Non-forcible sexual intercourse with a person who is under the statutory age of consent.
- **Sexual Harassment:** Conduct on the basis of sex that occurs in Brown’s education program or education activity and satisfies one or more of the following:
 - (i) An employee conditions the provision of an aid, benefit, or service on an individual’s participation in unwelcome sexual conduct (quid pro quo);
 - (ii) Unwelcome conduct determined by a reasonable person to be so severe, pervasive, and objectively offensive that it effectively denies a person equal access to the Brown’s education program or activity (Hostile Environment); and/or
 - (iii) “Sexual assault” as defined in 20 U.S.C. 1092(f)(6)(A)(v), “dating violence” as defined in 34 U.S.C. 12291(a) (10), “domestic violence” as defined in 34 U.S.C. 12291(a)(8), or “stalking” as defined in 34 U.S.C. 12291(a) (30).

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

- **Stalking:** Stalking is a course of conduct on the basis of sex directed at a specific person that would cause a reasonable person to (i.) fear for the person’s safety or the safety of others, or (ii.) suffer substantial emotional distress. This definition is prescribed by the 2014 Violence Against Women’s Act, 34 U.S.C.12291(a)(30).
- For purposes of the Title IX Policy, Stalking refers to actions “on the basis of sex or gender” that would constitute Sexual Harassment such as surveillance of a former intimate partner. Course of conduct means two or more acts, including, but not limited to, acts in which the stalker directly, indirectly, or through third parties, by an action, method, device, or means, follows, monitors, observes, surveils, threatens, or communicates to or about a person, or interferes with a person’s property. Substantial emotional distress means significant mental suffering or anguish that may, but does not necessarily require, medical or other professional treatment or counseling.

Stalking includes the concept of cyber-stalking, a form of stalking through electronic media such as the internet, social networks, blogs, cell phones, texts, or other similar devices or forms of contact.

Respondent: An individual(s) who has been reported to be the perpetrator of behavior that could constitute Prohibited Conduct.

Report: Information shared with the Title IX and Gender Equity Office that includes details of alleged Prohibited Conduct. A report is made when a Complainant, reporting party, or third party seeks information, support measures, or informs the University of alleged Prohibited Conduct, but such party is not making a Formal Complaint or pursuing a complaint resolution process to address the alleged Prohibited Conduct.

Support Measures: Non-disciplinary, non-punitive measures provided to a Complainant or Respondent designed to restore or preserve equal access to Brown’s programs and activities without unreasonably burdening the other party, including measures designed to protect the safety of all parties and deter future Prohibited Conduct. The Title IX Coordinator will oversee the implementation of support measures that are individualized to respond to the effects of the alleged Prohibited Conduct, and that are appropriate, reasonably available, and free of charge. Support measures may include a no-contact order, counseling, extensions of deadlines or other

course-related adjustments, modifications of work or class schedules, campus escort services, changes in work or housing locations, leave of absence, increased security and monitoring of certain areas of the campus, and other similar measures. Use of support measures is private and is available with or without a Formal Complaint. The University will maintain as confidential any support measures provided – to the extent that maintaining such confidentiality will not impair its ability to provide the support measures – by only disclosing the support measures implemented to those officials within the University with a need-to-know or as otherwise required or allowed by applicable law or University policy.

Brown will also provide reasonably available support measures for third-party reporters, provided that the accommodations are within the scope of that individual's relationship to Brown.

4.0 Responsibilities

All individuals to whom this SOP applies are responsible for becoming familiar with and following this SOP. University supervisors are responsible for promoting the understanding of this SOP and for taking appropriate steps to help ensure compliance with it.

All individuals who participate in any process described herein are prohibited from knowingly making false statements or knowingly submitting false information. Individuals who engage in this misconduct may be subject to disciplinary actions. Disciplinary action pursued against a party for knowingly making false statements or submitting false information in bad faith does not constitute retaliation prohibited under the Title IX Policy, provided, however, that a determination regarding responsibility, alone, is not sufficient to conclude that any part made a materially false statement or provided materially false information in bad faith.

- **Office of Equity Compliance and Reporting in the Division of Campus Life:** Oversees the response to reports, submission of a formal complaint, and the implementation of formal or informal resolution procedures. The University's response is coordinated by the following individuals:
 - **Title IX Coordinator:** The Title IX Coordinator for the University oversees the review of reports and Formal Complaints associated with Sexual Harassment, Sexual Assault, Relationship and Interpersonal Violence, and Stalking (Title IX) Policy. The Title IX Coordinator also oversees the implementation of interim actions, support measures, informal resolution processes, the investigation process, and administration of the hearings and/or appeals associated with alleged Policy violations. The Title IX Coordinator is also charged with monitoring compliance with Title IX; providing education and training; and tracking and reporting annually on all incidents in violation of Title IX Policy.
 - **Institutional Equity Investigator:** Serves as internal neutral fact finders.
 - **Associate Vice President for Institutional Equity, Accessibility, and Compliance:** Hears appeals of dismissal decisions.

5.0 Related Information

The following information compliments and supplements this document. The information is intended to help explain this SOP and is not an all-inclusive list of policies, procedures, laws, and requirements.

5.1 Related University Policies:

- [Corporation Policy Statement on Equal Opportunity and Non-Discrimination](#)
- [Sexual Misconduct Policy](#)
- [Title IX Policy](#)
- [Nondiscrimination and Anti-Harassment Policy](#)

5.2 Related Procedures:

- [Sexual Misconduct Grievance Procedure](#)

5.3 Related Forms: N/A

5.4 Frequently Asked Questions: N/A

5.5 Other Related Information: N/A

6.0 SOP Owner and Contact

6.1 **SOP Owner:** Vice President for Campus Life and Student Services

6.2 **SOP Approved by:** Vice President for Campus Life and Student Services

6.3 **Contact Information:** Title IX Coordinator

- titleixoffice@brown.edu
- 401-863-2026

7.0 SOP History

7.1 **SOP Issue Date:** August 14, 2020

7.2 **SOP Effective Date:** February 19, 2025

7.3 **SOP Update/Review Summary:** Prior SOP version(s) superseded by this SOP:

- Title IX Grievance Procedure, Effective Date: November 19, 2024
- Title IX Grievance Procedure, Effective Date: August 1, 2024
- Title IX Grievance Procedure, Effective Date: October 29, 2023
- Title IX Grievance Procedure, Last Renewed: February 23, 2021

APPENDIX C

Sexual Misconduct Policy

1.0 Policy Purpose

This policy prohibits Sexual Harassment, Gender-Based Harassment, Sexual Assault, Dating Violence, Domestic Violence, and Stalking, in addition to Sexual Exploitation and the Provision of Alcohol and/or Other Drugs for Purposes of Prohibited Conduct. This policy also prohibits Retaliation against an individual for making a Report of conduct prohibited under this policy or for participating in an investigation of an alleged violation of this policy.

This policy is in accordance with relevant provisions of the Violence Against Women Act; Title VII of the Civil Rights Act of 1964; the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act; their implementing regulations; and other applicable federal and Rhode Island state laws and regulations.

2.0 To Whom the Policy Applies

The behavioral expectations of this Policy apply broadly to the entire University community, including Students, Employees, Applicants, Contractors, Invitees, and other individuals participating in or attempting to participate in the University's Education Program or Activity ("Covered Persons"). The behavioral expectations of this Policy apply to any alleged Prohibited Conduct that creates a Hostile Environment in, or has a continuing adverse effect on, Brown's Education Program or Activity wherever that alleged Prohibited Conduct occurs, including on campus, off campus, and online.

3.0 Policy Statement

This Policy prohibits Sex Discrimination, including Sex-Based Harassment, as well as related Retaliation. This Policy also prohibits Prohibited Intimate Relationships. Sex Discrimination, Sex-Based Harassment, Retaliation, and Prohibited Intimate Relationships are collectively referred to in this Policy as Prohibited Conduct.

This Policy is written and interpreted broadly to include online manifestations of any Prohibited Conduct, when Prohibited Conduct occurs in or has an effect on the University's Education Program or Activity, or when it involves the use of University networks, technology, or equipment. Although Brown may not control websites, social media, or other venues through which harassing communications are made, when such communications are reported to the University, it will engage in a variety of means to address and mitigate the effects. These means may include the use of the Sexual Misconduct Grievance Procedures to address off-campus conduct whose effects contribute to limiting or denying a person access to Brown's Education Program or Activity.

The University designates and authorizes Mindy Wirges as its Title IX Coordinator to coordinate its efforts to comply with its responsibilities under Title IX. The contact information for the Title IX Coordinator is provided in Section 3.1.

In all cases in this Policy where a University official, including the Title IX Coordinator, is referenced, it shall include their designee.

3.1 Confidentiality and Privacy

3.1.1 Confidentiality

Confidential communications are those exchanged with individuals belonging to certain professions (such as healthcare providers, professional counselors, or pastoral counselors) which require maintaining the confidentiality of communications disclosed to the individual in the context of providing professional services. Such individuals cannot disclose the content of those communications, or records of the same, to any third party without the disclosing individual's prior written consent, or if permitted or required by law or relevant professional ethical obligations (such as "duty to warn"). These communications are privileged under federal or state law.

Brown has also identified some confidential Employees whose roles may not by nature be confidential, but who Brown has determined are not required to notify the Title IX Coordinator when a person informs them of conduct that may constitute Prohibited Conduct. This category includes individuals designated to provide services to individuals in connection with Prohibited Conduct, with respect to information disclosed in the course of providing those services.

Also included in the category of confidential Employees are individuals who conduct human subjects-research studies that have been approved by the Institutional Review Board and which are designed to gather information about Prohibited Conduct, with respect to information disclosed in the course of conducting the approved study.

Those campus and community professionals who maintain information confidentially are as follows:

Athletic Trainers

(401) 863-3851
OMAC
235 Hope Street

Counseling and Psychological Services (CAPS)

(401) 863-3476
Page-Robinson Hall 512

Brown Emergency Medical Services (EMS)

401-863-4111

Employee Assistance Program (Spring Health)

(855) 629-0554 / (844) 773-1425

Office of the Chaplains and Religious Life

(401) 863-2344
Page-Robinson Hall 410

Sexual Assault Response Line

(401) 863-6000

Sexual Harm Acute Response & Empowerment (SHARE) Advocates

(401) 863-2794

450 Brook Street

Student Health Services

(401) 863-3953

450 Brook Street

University Ombuds

(401) 863-6145

Brown-RISD Hillel, Third Floor

3.1.2 Privacy

Privacy refers to Brown's commitment to sharing information related to any Report, Complaint, Supportive Measures, Informal Resolution Process, or Formal Resolution Process under this Policy only:

- to a person with a legal right to receive disclosures of information or with prior written consent;
- when necessary to effectuate this Policy, or to otherwise address conduct which may reasonably constitute Sex Discrimination;
- as required by federal law or regulation, including by the terms and conditions of a federal award (e.g., a grant award or other funding agreement); and/or
- when required or permitted by state or local law or the Family Educational Rights and Privacy Act (FERPA).

Brown provides training to Employees regarding the safeguarding of private information and instructs Parties and witnesses about Brown's privacy-related expectations.

Except as otherwise provided for in this Policy and in the Sexual Misconduct Grievance Procedures (for example, with respect to the privacy of documents and with respect to Brown's prohibition on Retaliation), Brown will not restrict the ability of either Party to discuss the allegations prompting a Report or Complaint.

3.1.2.1 Privacy of Documents

In order to preserve the privacy of the Parties and witnesses, documents prepared in connection with the Sexual Misconduct Grievance Procedures (including, but not limited to, Complaints; Notices of Investigation and Allegation; draft and final interview summaries; draft and final descriptions of evidence and/or investigative reports; notices of hearing; notices of outcome; notices of Discipline and/or Remedies; and any appeals-related documents), as well as audiovisual recordings thereof

made of any proceedings under this Policy, may not be disclosed by Parties or others acting on their behalf other than as provided for in this Policy, and as may be required or authorized by law. Any violation of this provision may result in discipline.

3.2 Reporting and Resources

3.2.1 Designated Reporting Locations

The University encourages individuals harmed or targeted by, or witnesses of, Prohibited Conduct to report incidents to the Title IX Coordinator. The Title IX Coordinator is available to meet with any individual, including a Complainant, a Respondent, or a third party, to provide information, on- and off-campus resources, and various procedural options. Individuals can report incidents directly to the following:

Title IX and Gender Equity Office

20 Benevolent Street
Providence, RI 02912
titleixoffice@brown.edu
(401) 863-2026
(401) 863-5140

[Online reporting form](#)

Deputy Title IX Coordinators

Yolanda Castillo-Appollonio, Deputy Title IX Coordinator for Undergraduate Students; Senior Associate Dean and Director of Student Conduct and Community Standards
yolanda_castillo-appollonio@brown.edu
(401) 863-2653

Lindsay Orchowski, Deputy Title IX Coordinator for the Medical School; Associate Professor of Psychiatry and Human Behavior (Research)
lindsay_orchowski@brown.edu
(401) 444-7021

Maria E. Suarez, Deputy Title IX Coordinator for Graduate Students; Associate Dean of Student Support Services
maria_suarez@brown.edu
(401) 863-1802

Anne Windham, Deputy Title IX Coordinator for Faculty; Senior Associate Dean of the Faculty
anne_windham@brown.edu
(401) 863-5410

Individuals should report incidents that involve an imminent safety risk to:

Public Safety and Emergency Management

75 Charlesfield Street

Emergency Line: (401) 863-4111

Non-Emergency Line: (401) 863-3322

3.2.2 Mandatory Reporters

Taking meaningful action when conduct prohibited by this Policy occurs is a critical component of Brown's commitment to a campus that is free from Prohibited Conduct.

Brown asks faculty and staff in varying leadership roles who oversee the welfare of faculty, staff, students, and University programs to assist us in these efforts by reporting all disclosures or knowledge of Prohibited Conduct to the Title IX Coordinator. Such reports amplify the University's ability to know what is occurring within its programs and activities and to respond accordingly. The Title IX Coordinator will conduct an initial assessment of these Reports and will do so in a manner consistent with the privacy choices of the Complainant or reporting party.

Community members who are mandated to report allegations of Prohibited Conduct to the Title IX Coordinator are:

- Academic department chairs and directors of University institutes (e.g., Carney, IBES, ICERM)
- Athletic Team Head Coaches and Assistant Coaches including Strength and Conditioning Coaches
- Community Coordinators
- Deans and Directors in Campus Life
- Deans and Directors in the College
- Deans and Directors in the Graduate School
- Deans and Directors of Pre-College and Undergraduate Programs
- Deans and Directors in the Office of the Dean of the Faculty, and the Schools of Engineering, Public Health, Professional Studies and Watson School of International and Public Affairs
- Deans and Directors in the Warren Alpert Medical School
- Public Safety and Emergency Management
- Deputy Title IX Coordinators
- Director of Athletics and Assistant, Associate and Deputy Directors of Athletics
- Directors, Assistant Directors and Area Coordinators in University Residential Life and Housing Programs; Centers' Assistant Directors and Program Coordinators

The Report should include any and all relevant known details about the alleged incident, including the following:

- the names of the involved Parties;
- the alleged conduct; and
- the date, time, and location of the incident.

Any questions about the status of an employee as a ‘Mandatory Reporter’ should be addressed to the Title IX Coordinator.

All other faculty, staff, and students not designated as a Mandatory Reporter are strongly encouraged to report allegations of Prohibited Conduct to the Title IX Coordinator or a Deputy Title IX Coordinator.

Where possible, mandatory reporters should make an effort to ensure that the person reporting the conduct understands the Employee’s mandatory reporting obligation and the person’s right to share the information confidentially with confidential Employees, or with off-campus confidential resources.

A mandatory reporter must report information they have received regardless of the manner of receipt, including through a third party.

Mandatory reporters are not permitted to make anonymous Reports in order to satisfy their obligations as a mandatory reporter.

Failure of a mandatory reporter to report an incident of Prohibited Conduct of which they become aware is a violation of this Policy and may subject the mandatory reporter to disciplinary action. This also includes situations when a harasser is a mandatory reporter. Such individuals are obligated to report their own misconduct and failure to do so is a chargeable offense under this Policy.

A mandatory reporter who is a target of Prohibited Conduct is not required to report their own experience but is encouraged to do so.

3.2.3 Time Frame for Reporting

There is no time limit on submitting a Formal Complaint to the Title IX Coordinator or designee. However, a Complainant pursuing a complaint resolution process associated with this policy must be participating in or attempting to participate in an educational program, employment, or other activity of Brown at the time of filing a Formal Complaint.

If the Complainant and/or Respondent is no longer affiliated with Brown (e.g., a report is made after a student is no longer enrolled or graduated or an employee is no longer employed by Brown), the ability to investigate, respond, and provide remedies may be more limited or impossible. The University will provide reasonably available and appropriate support measures, assist the Complainant in identifying external reporting options, and may take appropriate action to address the Prohibited Conduct.

The University applies the policy defining the Prohibited Conduct that was in effect at the time of the alleged conduct and the procedures that are in effect when the Formal Complaint is filed.

3.2.4 Amnesty

3.2.4.1 Personal Ingestion of Alcohol and Other Drugs

Brown generally will offer amnesty to student Complainants, Respondents, reporting parties, and witnesses who disclose the personal ingestion of alcohol or other drugs, in violation of [Brown University Code of Student Conduct](#), when making a report of Prohibited Conduct and/or participating in an Informal Resolution Process or Formal Resolution Process. Although amnesty safeguards the individual from a disciplinary notation or finding of responsibility for a policy violation for drugs or alcohol, it does not exempt the University from taking appropriate action to address the conduct and/or mitigate future violations.

3.2.4.2 Violation of Healthy Brown Public Health Protocols

Brown generally will offer amnesty to Complainants, Respondents, reporting parties, and witnesses who disclose participating in activities that do not adhere to established health protocols when making a report of Prohibited Conduct or participating in an Informal Resolution Process or Formal Resolution Process unless the University determines that there was malicious intent. Although amnesty safeguards the individual from a disciplinary notation or finding of responsibility for a policy violation, it does not exempt the University from taking appropriate action to address the conduct and/or mitigate future violations.

3.2.5 On-Campus Resources

Individuals may speak with or seek services from on-campus resources to learn the available Supportive Measures. The following offices are considered private but not confidential:

Student Support Services

(401) 863-3145

Administrator On Call (AOC)

(401) 863-3322

Page-Robinson Hall, 5th Floor

Public Safety

(401) 863-4111

Non-Emergency DPS Response

(401) 863-3322

Office of International Student and Scholar Services (OISSS)

(401) 863-2427

Page-Robinson Hall, 4th Floor

Survivor Resource Guide

Brown community members can access [Brown's Survivor Resource Guide](#).

3.2.6 Community Resources

Brown also strongly encourages anyone who becomes aware of an alleged incident of Prohibited Conduct, which may constitute a violation of Rhode Island state law, to report the incident to local law enforcement and provide support, resources, and assistance to those who do so.

Providence Police Department

Emergency: 911

Non-Emergency: (401) 272-3121

Day One (Sexual Assault and Trauma Center)

Helpline: (800) 494-8100

Rhode Island Bar Association (Legal Assistance)

(401) 421-5740

Email: info@ribar.com

U.S. Citizenship and Immigration Services (Visa and Immigration Assistance)

[Find Help in Your Community website](#)

American Immigration Lawyers Association (Visa and Immigration Assistance)

Email: ils@aila.org

Medical care may address physical and mental health concerns, including those related to pregnancy and/or sexually transmitted infections. Medical providers may also be able to assist in the collection and preservation of evidence. The ability to collect and preserve evidence of Sexual Assault is limited in time (typically to a window of 72 hours), so it is essential that care be sought as soon as possible. Individuals should avoid showering/bathing, douching, and, if possible, urinating. In the event of oral sexual contact, individuals should avoid eating, drinking, or brushing teeth. Any soiled clothes, towels, or bedding should be retained in paper bags. Preserving physical evidence in this manner may facilitate a criminal investigation, but seeking medical treatment does not obligate an individual to pursue a criminal complaint.

Hasbro Children's Hospital

(401) 444-4000

Women and Infants Hospital

(401) 274-1100

Rhode Island Hospital

(401) 444-5411

3.3 Academic Freedom

Brown is committed to the principles of free inquiry and expression. Vigorous discussion and debate are fundamental to this commitment, and this Policy is not intended to restrict teaching methods. Nothing in this Policy will be construed to negate any rights afforded in the Faculty Rules and Regulations, Part 5, Section 12.I.C.

3.4 Conflict of Interest

The **Brown University Conflict of Interest and Commitment Policy** and its related guidelines apply to all members of the Brown community and to all processes and procedures, including the Sexual Misconduct Grievance Procedures, in place to support and implement this Policy. A conflict of interest may arise when a member of the Brown community may be able to use the authority of their position to influence a University decision, action, or outcome with regard to the implementation and enforcement of this Policy, including the Grievance Procedures. It is the responsibility of all members of the Brown community involved in any aspect of a report of Prohibited Conduct to read the University's Conflict of Interest and Commitment Policy and to disclose potential or actual conflicts as they arise to the Title IX Coordinator or University Human Resources for Employees.

3.5 Training and Education

As part of its commitment to preventing Prohibited Conduct, Brown offers education and awareness programs to bring awareness to and reduce the occurrence of Prohibited Conduct. Incoming Students and Employees receive prevention and awareness programming as an orientation requirement.

All Employees are trained upon hiring and annually thereafter on the University's obligation to address Sex Discrimination in its Education Program or Activity, the scope of conduct that constitutes Sex Discrimination, including Sex-Based Harassment, and their mandatory reporting requirements.

In addition to the annual training described above, all individuals involved in handling Title IX matters on behalf of the University, including Deputy Title IX Coordinators, investigators, Title IX Council members, Hearing Officers, and Appeal Decision-Makers, also receive annual training from the Title IX and Gender Equity Office on how to serve impartially, including by avoiding prejudgment of the facts at issue, conflicts of interest, and bias; this Policy and the Title IX Grievance Procedures; the meaning and application of the term Relevant, as defined below, and the types of evidence that are impermissible regardless of relevance. The training also strengthens skills in asking questions, reviewing the investigation report, and determining Discipline. Individuals who facilitate informal resolution are additionally trained on the rules and practices associated with the Informal Resolution Process.

The Title IX Coordinator and Deputy Title IX Coordinators receive the annual training described above, as well as training on the specific responsibilities of the Title IX Coordinator and the University's recordkeeping system.

3.6 Recordkeeping

The University will document and maintain the following records, in accordance with the records retention schedule of the University for a period of seven (7) years:

- Reports; Complaints; and records documenting the response to Reports and Complaints, including any Supportive Measures provided, any Emergency Removal or Administrative Leave imposed, and any Informal Resolution Process or Formal Resolution Process undertaken, including the resulting outcome (e.g., the result of any Informal Resolution Process, determinations of responsibility, Discipline imposed on the Respondent, Remedies provided to the Complainant, appeals and the results of such appeals);
- Any records documenting action taken by the University to address Reports of Sex Discrimination, prevent its recurrence, and remedy its effects; to address any barriers identified to reporting such conduct; and to educate Employees about their mandatory reporting responsibilities;
- Any audio or audiovisual recording or transcript required to be retained; and
- All materials used to provide required training

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

4.0 Definitions

For the purpose of this Policy, the terms below have the following definitions:

Administrative Leave: Administrative Leave is when the University places an Employee on interim work, supervision, leadership, or teaching suspension after the filing of a Formal Complaint against the Employee.

Advisor: An advisor is an individual of the Complainant's or Respondent's choosing, including an attorney, to provide support during the Informal Resolution Process or Formal Resolution Process. *More on the role and responsibility of an advisor can be found in the [Sexual Misconduct Grievance Procedures](#).*

Appeal Decision-Maker: The person or panel who accepts or rejects a submitted appeal request, determines whether any of the grounds for appeal are met, and directs responsive action accordingly.

Coercion: Coercion is verbal and/or physical conduct, including intimidation, unwanted contact, and express or implied threats of physical harm, that would reasonably place an individual in fear of immediate harm and that is employed to compel someone to engage in sexual contact.

Complainant: A Complainant is a Student, Employee, or other individual who is alleged to have been subjected to Prohibited Conduct.

Complaint: An oral or written request to the University that objectively can be understood as a request for the University to investigate and make a determination about the alleged Policy

violation. It is Brown's policy to confirm a Complainant's request in writing prior to initiating the Sexual Misconduct Grievance Procedures.

A Complaint can be made by a Complainant or the Sexual Misconduct Coordinator, subject to the following limitations:

- For Complaints of **Sex-Based Harassment**, a Complainant may bring a Complaint under this Policy if they were enrolled, employed, or otherwise participating or attempting to participate in Brown's Education Program or Activity at the time the alleged Sex-Based Harassment occurred. The Complainant need not be enrolled, employed, or otherwise participating or attempting to participate in Brown's Education Program or Activity at the time the Complaint is made.
- For Complaints of **Sex Discrimination other than Sex-Based Harassment and Retaliation**, any person, not just a Complainant, may bring a Complaint under this Policy if they were enrolled, employed, or otherwise participating or attempting to participate in Brown's Education Program or Activity at the time the alleged Sex Discrimination occurred. The person need not be enrolled, employed, or otherwise participating or attempting to participate in Brown's Education Program or Activity at the time the Complaint is made.
- For Complaints of **Prohibited Intimate Relationships**, a Complainant must have been enrolled or employed at Brown at the time the alleged Prohibited Conduct occurred in order to file a Complaint under this Policy. The Complainant must also be enrolled or employed at the time the Complaint is made.

Note: A Complaint may also be brought by a parent, guardian, or other authorized legal representative with the legal right to act on behalf of a Complainant, where applicable.

Consent: Consent is an affirmative and willing agreement to engage in specific forms of sexual contact with another person. Consent requires an outward demonstration through mutually understandable words or actions, indicating that an individual has freely and affirmatively chosen to engage in sexual contact. Consent cannot be obtained through the use of Coercion or force or by taking advantage of the Incapacitation of another individual.

Silence, passivity, Incapacitation from alcohol or drugs, or the absence of resistance does not imply Consent. It is important not to make assumptions; if confusion or ambiguity arises during a sexual interaction, it is essential that each participant stops and clarifies the other's willingness to continue.

Consent can be withdrawn at any time. When Consent is withdrawn, sexual activity must cease. Prior Consent does not imply current or future Consent. Even in the context of an ongoing relationship, Consent must be sought and freely given for each instance of sexual contact. An essential element of Consent is that it be freely given. Freely given Consent might not be present, or may not even be possible, in relationships of a sexual or intimate nature between individuals where one individual has power, supervision, or authority over another.

In evaluating whether Consent was given, consideration will be given to the totality of the facts and circumstances, including but not limited to the extent to which a Complainant or reporting party affirmatively uses words or actions indicating a willingness to engage in sexual contact,

free from Coercion; whether a reasonable person in the Respondent's position would have understood such person's words and acts as an expression of Consent; and whether there are any circumstances, known or reasonably apparent to the Respondent, demonstrating Incapacitation.

Covered Persons: Applicants, Contractors, Employees, Invitees, and Students, as defined below.

- **Applicants:** Individuals who are applying or have applied for employment or admission as a student or other participant in Brown's Education Program or Activity.
- **Contractors:** Independent contractors, vendors, or other third parties contractually obligated to perform services for the University.
- **Employees:** Individuals employed by the University, including faculty, affiliates, visiting faculty, postdoctoral research associates, and all staff (including all exempt and non-exempt, bargaining unit, and senior administrative positions), as well as those physicians and health scientists who are not employed by the University but have Brown faculty, affiliate, postdoctoral, or house staff appointments for the purpose of teaching and/or research in the Division of Biology and Medicine.
 - A **Student Employee** is an individual who is both a Student and an Employee of Brown.
- **Invitees:** Visitors or guests of the University.
- **Students:** Individuals who have gained admission to the College, the Graduate School, the Warren Alpert Medical School, the School of Public Health, the School of Engineering, and/or the School of Professional Studies.
 - For Rhode Island School of Design (RISD) students who are not dually enrolled at Brown, the Title IX and Gender Equity Office will work with the RISD Title IX Office to determine jurisdiction.

Day: All references in this Policy to days refer to business days unless specifically noted as calendar days. A business day is when the University is in normal operation.

Decision-Maker: For Student and Staff Respondent cases, the Hearing Officer hears the evidence, determines Relevance, and makes the Final Determination of whether the Policy has been violated and, if so, assigns Discipline. For Faculty Respondent cases, the Hearing Panel hears the evidence and makes the Final Determination of whether the Policy has been violated and, if so, recommends Discipline.

Discipline: A consequence imposed on a Respondent following a determination that the Respondent violated this Policy. A Respondent who is found responsible for violating the Policy is subject to one or more of the following disciplinary actions:

- A verbal or written warning
- Probation
- Suspension
- Expulsion
- Revocation of or withholding a degree

- Academic transcript notation (see Note below)
- Restitution for damage to property
- Reflection or research papers or other academic assignments
- Letters of apology
- Restorative circles
- Attending or presenting educational programs or training
- No Contact Orders
- Referrals to other offices and resources on campus
- Administrative leave with or without pay
- Termination of employment
- Termination of relationship with the University
- Change in job description

Note: Academic Transcripts: Discipline of suspension and expulsion includes a permanent notation on the Student's official academic transcript that the Office of the Registrar maintains. A Respondent's access to a copy of their academic transcript will be suspended, and the University will not release a copy of the Respondent's academic transcript to any other institution or third party during an investigation and resolution of a Complaint. Requests to release an academic transcript must be submitted to the Title IX Coordinator, who will determine whether to release the academic transcript and whether a notation indicating that a disciplinary investigation and/or charges are pending should be included on the academic transcript.

Education Program or Activity: Conduct that occurs in Brown's Education Program or Activity includes all conduct which is subject to Brown's disciplinary authority and which occurred in the United States, including on-campus or, if applicable, in buildings owned or controlled by a student organization that is officially recognized by Brown. Brown will address conduct contributing to a Hostile Environment even if the underlying conduct itself occurred outside Brown's Education Program or Activity, including if it occurred outside the United States.

Emergency Removal: The University may remove a Respondent from its Education Program or Activity, or certain aspects thereof (such as, but not limited to, access to University facilities, housing, classes, and/or student activities) if, after undertaking an individualized safety and risk analysis, the University determines that an immediate and serious threat to the health or safety of a Complainant, any Students, Employees, or other persons arising from the alleged Prohibited Conduct justifies removal. In the event of such removal, the University provides the Respondent with notice and an opportunity to seek modification or reversal of the removal immediately following the removal. The Title IX Coordinator performs the safety and risk analysis, which may in the discretion of the Title IX Coordinator be conducted in conjunction with the Behavioral Assessment and Response Team (BART).

Final Determination: A conclusion by the standard of proof (preponderance of evidence) that the alleged Prohibited Conduct did or did not violate this Policy.

Force: The use or threat of physical violence to overcome an individual's freedom of will to choose whether or not to participate in sexual contact.

Incapacitation: An individual who is incapacitated lacks the ability to make informed judgments and cannot consent to sexual contact. Incapacitation is the inability, temporarily or permanently, to give Consent because an individual is mentally and/or physically helpless, asleep, unconscious, or unaware that sexual activity is occurring. An incapacitated person cannot make rational, reasonable decisions because they lack the capacity to give knowing/informed consent (e.g., to understand the “who, what, when, where, why, and how” of their sexual interaction).

Mentally helpless means a person is temporarily incapable of appraising or controlling one’s conduct. Physically helpless means a person is physically unable to verbally or otherwise communicate Consent or unwillingness to an act.

Where alcohol or other drugs are involved, Incapacitation is a state beyond impairment or intoxication. Where alcohol or other drugs are involved, evaluating Incapacitation requires an assessment of how the consumption of alcohol and/or drugs affects a person’s decision-making ability, awareness of consequences, ability to make informed, rational judgments, capacity to appreciate the nature and quality of the act, or level of consciousness. The assessment is based on objectively and reasonably apparent indications of Incapacitation when viewed from the perspective of a sober, reasonable person.

Impact Statements: A mechanism for the Parties to share more holistic information about themselves, the impact the reported conduct and/or resolution process has had on them, and any information related to Discipline.

Informal Resolution: A resolution agreed to by the Complainant and Respondent and approved by the Title IX Coordinator that occurs prior to a Final Determination.

Mitigation Statements: A written statement by the Respondent explaining any factors that the Respondent believes should mitigate or otherwise be considered in determining the Discipline imposed.

Parental, Family, or Marital Status:

Parental Status: the status of a person who, with respect to another person under the age of 18, or who is 18 or older but incapable of self-care because of a physical or mental disability, is a biological parent; adoptive parent; foster parent; stepparent; legal custodian or guardian; *in loco parentis*; or actively seeking legal custody, guardianship, visitation, or adoption.

Family Status: The configuration of a person’s family or their role in a family.

Marital Status: Whether or not a person is married.

Importantly, discrimination based on these statuses must be sex-based in order to constitute Sex Discrimination (such as treating married women more or less favorably than married men, treating an unmarried mother more or less favorably than a married mother based on sex stereotypes, or treating a man who is married to a man more or less favorably than a woman who is married to a man).

Party: A Complainant or Respondent.

Pregnancy or Related Conditions: Pregnancy, childbirth, termination of pregnancy, or lactation, medical conditions related thereto, or recovery from.

Prohibited Conduct:

- **Sex Discrimination:** Subjecting an individual or group to an adverse action – including differential treatment - based on sex, including sex stereotypes, sex characteristics, sexual orientation, and/or gender identity; Parental, Family, or Marital Status; and/or Pregnancy or Related Conditions. Sex-Based Harassment, including Sexual Assault, Dating Violence, Domestic Violence, and Stalking, is a form of Sex Discrimination, but separately defined under this Policy.
- **Sex-based Harassment:** Harassment on the basis of sex, including sex stereotypes, sex characteristics, Pregnancy or Related Conditions, sexual orientation, and gender identity, that falls into one or more of the following categories:
 - **Quid Pro Quo:** An Employee, agent, or other person authorized by the University to provide an aid, benefit, or service under the University's Education Program or Activity explicitly or impliedly conditions the provision of an aid, benefit, or service on an individual's participation in unwelcome sexual conduct.
 - **Hostile Environment Harassment:** Unwelcome sex-based conduct that, based on the totality of the circumstances, is subjectively and objectively offensive, and is so severe or pervasive, that it limits or denies a person's ability to participate in or benefit from the University's Education Program or Activity. Determining whether conduct has created a hostile environment is a fact-specific inquiry which may include many factors such as, but not limited to: the degree to which the conduct affected the Complainant's ability to access the University's Education Program or Activity; the type, frequency, and duration of the conduct; the Parties' ages, roles, previous interactions, and other factors about each Party that may be Relevant to evaluating the effects of the alleged unwelcome conduct; the location and context in which the conduct occurred; and other Sex-Based Harassment in the University's Education Program or Activity.
 - **Sexual Assault, Dating Violence, Domestic Violence, Stalking:** Sexual Assault, Dating Violence, Domestic Violence, and Stalking are forms of Sex-Based Harassment, just as Sex-Based Harassment is a form of Sex Discrimination. These types of Prohibited Conduct are separately defined.
- **Sexual Assault:** Sexual Assault is a forcible or nonforcible sex offense under the uniform crime reporting system of the Federal Bureau of Investigation, which includes the following acts:
 - **Fondling:** The touching of the private body parts (breast, buttocks, groin, genital, or other intimate parts) of another person without that person's Consent, including instances where the Complainant is incapable of giving Consent because of their age or because of their temporary or permanent mental or physical incapacity.
 - **Incest:** Nonforcible sexual intercourse between persons who are related to each other within the degrees wherein marriage is prohibited by law.
 - **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.
 - **Sexual Assault With An Object:** To use an object or instrument to unlawfully penetrate, however slightly, the genital or anal opening of the body of another person without that

person's Consent, including instances where the person is incapable of giving Consent because of their age or temporary or permanent mental or physical incapacity.

- **Statutory Rape:** Nonforcible sexual intercourse with a person who is under the statutory age of Consent.

- **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 a consideration of the following factors: (1) length of the relationship; (2) type of relationship; and (3) the frequency of the interaction between the parties involved in the relationship. Dating Violence does not include acts covered under the definition of Domestic Violence.

- **Domestic Violence:** Domestic Violence is violence committed (1) by a current or former spouse or intimate partner of the victim under the family or domestic violence laws of Rhode Island, or a person similarly situated to a spouse of the victim; (2) by a person with whom the victim shares a child in common; (3) by a person who is cohabitating with, or has cohabitated with, the victim as a spouse or intimate partner; or (4) 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 Rhode Island.

Domestic Violence includes, but is not limited to, physical, sexual, emotional, economic, and/or psychological actions or threats of action, including threatening to reveal personal or confidential information (including, but not limited, to information regarding one's gender identity and/or sexual orientation), that are intimidating, frightening, terrorizing, or threatening. Prohibited Conduct under this definition includes threats of violence or harm to one's self, one's family member(s) or friends, and/or one's pet.

- **Economic Abuse:** The term 'Economic Abuse,' in the context of Domestic Violence, Dating Violence, and abuse in later life, means behavior that is coercive, deceptive, or unreasonable and/or controls or restrains a person's ability to acquire, use, or maintain economic resources to which they are entitled, including using Coercion, fraud, or manipulation to:
 - Restrict a person's access to money, assets, credit or financial information;
 - Unfairly use a person's personal economic resources, including money, assets, and credit, for one's own advantage; or
 - Exert undue influence over a person's financial and economic behavior or decisions, including forcing default on joint or other financial obligations, exploiting powers of attorney, guardianship, or conservatorship, or failing or neglecting to act in the best interests of a person to whom one has a fiduciary duty.

- **Technological Abuse:** An act or pattern of behavior that occurs within Domestic Violence, Sexual Assault, Dating Violence or Stalking and is intended to harm, threaten, intimidate, control, stalk, harass, impersonate, exploit, extort, or monitor, except as otherwise permitted by law, another person, that occurs using any form of technology, including but not limited to: internet enabled devices, online spaces ad platforms, computers, mobile devices, cameras and imaging programs, apps, location tracking devices, or communication technologies, or any other emerging technologies.

- **Stalking:** Stalking is a course of conduct on the basis of sex directed at a specific person that would cause a reasonable person to (1) fear for their safety or the safety of others; or (2) suffer substantial emotional distress.

Course of conduct means more than one act. Stalking can occur in person or using technology and the duration, frequency, and intensity of the conduct will be considered. Stalking tactics can include, but are not limited to watching, following using tracking devices, monitoring online activity, unwanted contact, property invasion or damage, hacking accounts, threats, violence, sabotage, and attacks.

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

- **Sexual Exploitation:** Sexual Exploitation is a form of Hostile Environment Harassment that involves taking nonconsensual sexual advantage of another person for the benefit of anyone other than the person being taken advantage of. Examples of Sexual Exploitation include, but are not limited to:
 - Sexual voyeurism (such as watching or taking pictures, videos, or audio recordings of another person in a state of undress or of another person engaging in a sexual act without the Consent of all parties);
 - Invasion of sexual privacy (e.g., doxxing);
 - Knowingly making an unwelcome disclosure of (or threatening to disclose) an individual's sexual orientation, gender identity, or gender expression;
 - Disseminating, streaming, or posting pictures or video of another in a state of undress or of a sexual nature without the person's Consent;
 - Exposing one's genitals to another person without Consent;
 - Prostituting another individual; or
 - Knowingly exposing another individual to a sexually transmitted infection without the other individual's knowledge and Consent;
 - Causing or attempting to cause the Incapacitation of another person (through alcohol, drugs, or any other means) for the purpose of compromising that person's ability to give Consent to sexual activity, or for the purpose of making that person vulnerable to non-consensual sexual activity;
 - Misappropriation of another person's identity on apps, websites, or other venues designed for dating or sexual connections (e.g., spoofing);
 - Forcing a person to take an action against that person's will by threatening to show, post, or share information, video, audio, or an image that depicts the person's nudity or sexual activity;
 - Knowingly soliciting a minor for sexual activity;
 - Engaging in sex trafficking;
 - Creating or disseminating synthetic media, including images, videos, or audio representations of individuals doing or saying sexually-related things that never happened, or placing identifiable real people in fictitious pornographic or nude situations without their consent (i.e., Deepfakes);
 - Creating or disseminating images or videos of child sexual abuse material

- **Prohibited Intimate Relationships:** No Employee shall request or accept sexual favors from or engage in a romantic, sexual, or intimate relationship with any Brown University undergraduate Student. This prohibition includes intimate relationships between Student supervisors and supervisees, and undergraduate, graduate, or medical school Student teaching or research assistants, teaching fellows, or proctors, and any undergraduate Student

who is enrolled in a course or section taught by that individual or otherwise subject to that individual's academic supervision.

Relationships of a sexual or intimate nature between Employees and graduate and medical school Students where the Employee has power, supervision, or authority over the Student are prohibited. No faculty, graduate or medical school Student, medical resident or fellow, postdoctoral fellow or associate, teaching or research assistant, fellow, or proctor shall request or accept sexual favors from or engage in a romantic, sexual, or intimate relationship with any graduate or medical school Student who is enrolled in a course or section taught by that individual or otherwise subject to that individual's academic supervision.

Academic supervision includes teaching, advising, supervising research, serving on a dissertation or other academic committee, grading, and/or having an influence upon funding and/or academic progress, and/or otherwise occupying a position of influence or power over a Student's academic program.

Even when both parties have consented at the outset to the development of such a relationship, it is the person in the position of greater authority who may be investigated for or charged with Prohibited Conduct.

Pre-existing relationships of a sexual or intimate nature with a Student or relationships between individuals who are Employees must be disclosed on the Conflict of Interest Form and may require a management plan.

- **Retaliation:** Any intimidation, threat, coercion, or discrimination against any person by the University, a Student, or an Employee or other person authorized by the University to provide aid, benefit, or service under the University's Education Program or Activity, for the purpose of interfering with that person's rights under this Policy, or because the person has made a Report or Complaint under this Policy; made a report or complaint to an external agency or to law enforcement; or testified, assisted, or otherwise participated or refused to participate in any manner in an investigation, proceeding, or hearing under this Policy, including in an Informal Resolution Process, in the Sexual Misconduct Grievance Procedures. It is not Retaliation for the University to require an Employee, or other person authorized by the University to provide aid, benefits, or services as part of the University's Education Program or Activity, to participate as a witness in, or otherwise assist with, any Informal Resolution Process or Formal Resolution Process under this Policy.
- **Relevant:** Relevant means related to the allegations of Prohibited Conduct at issue and whether or not the alleged Prohibited Conduct occurred. Questions are Relevant when they seek evidence that may aid in showing whether the alleged Prohibited Conduct occurred, and evidence is Relevant when it may aid a decisionmaker in determining whether the alleged Prohibited Conduct occurred. The following evidence is impermissible (and will not be considered Relevant) even if it would otherwise be considered Relevant:
 - evidence protected under a privilege recognized by federal or state law, unless the person holding the privilege has waived it voluntarily;
 - records that are made or maintained by a physician, psychologist, or other recognized professional or paraprofessional in connection with the provision of treatment to a Party or witness, unless the person has voluntarily consented, in writing, to the use of such records in the Sexual Misconduct Grievance Procedures; and/or

- evidence and questions about the Complainant's sexual interests or prior sexual conduct, unless evidence and questions about the Complainant's prior sexual conduct:
 - is offered to prove that someone other than the Respondent committed the conduct alleged, or
 - concerns specific incidents of prior sexual activity with the Respondent which are offered to prove Consent.

Remedies: Measures provided, as appropriate, to a Complainant or any other person the University identifies as having had their equal access to the University's Education Program or Activity limited or denied by Prohibited Conduct. These measures are provided to restore or preserve that person's access to the University's Education Program or Activity after the University determines that Prohibited Conduct occurred.

Respondent: A person who is alleged to have engaged in Prohibited Conduct.

Report: Any notice of conduct that may constitute Prohibited Conduct. Not every Report is or will result in a Complaint. For example, a Report is made when a Complainant, reporting party, or third party seeks information or Supportive Measures, or informs the University of Prohibited Conduct, even when such party is not making a Complaint or pursuing a complaint resolution process to address the alleged Prohibited Conduct.

Sex: Sex assigned at birth, sex stereotypes, sex characteristics, Pregnancy or Related Conditions, Parental, Family, or Marital Status, sexual orientation, and gender identity.

Supportive Measures: Non-punitive, non-disciplinary individualized measures offered as appropriate, as reasonably available, and without fee or charge to the Complainant or Respondent. Supportive Measures are designed to: (1) restore or preserve that Party's access to the University's Education Program or Activity, including measures that are designed to protect the safety of the Parties or the University's educational environment; and/or (2) provide support during the Informal Resolution Process or Formal Resolution Process, without unreasonably burdening the either Party.

5.0 Responsibilities

All individuals to whom this Policy applies are responsible for becoming familiar with and following this Policy. University supervisors and Employees with Student oversight duties are responsible for promoting the understanding of this Policy and for taking appropriate steps to help ensure and enforce compliance with it.

6.0 Consequences for Violating this Policy

A Student or Employee determined to be responsible for Prohibited Conduct pursuant to the Grievance Procedures is subject to Discipline.

Applicants, Affiliates, Contractors, or Invitees who violate this Policy may have their relationship with the University terminated and/or their privilege of being on the University's premises withdrawn.

7.0 Related Information

Brown University is a community in which individuals are encouraged to share concerns with University leadership. Additionally, [Brown's Anonymous Reporting Hotline](#) allows anonymous and confidential reporting on matters of concern [online](#) or by phone (877-318-9184).

The following information complements and supplements this document. The information is intended to help explain this Policy and is not an all-inclusive list of policies, procedures, laws and requirements.

7.1 Related Policies:

- [Corporation Policy Statement on Equal Opportunity and Nondiscrimination](#)
- [Nondiscrimination and Anti-Harassment Policy](#)
- [Conflict of Interest and Commitment Policy](#)
- [Brown University Code of Student Conduct](#)
- [Pregnancy and Parenting Policy](#)
- [University Code of Conduct](#)
- [Non-Retaliation Policy](#)
- [Title IX Policy](#)

7.2 Related Procedures:

- [Sexual Misconduct Grievance Procedure](#)
- [Title IX Grievance Procedure](#)
- [Student Conduct Procedures](#)
- [Discrimination and Harassment Standard Operating Procedure for Addressing and Responding to Reports and Complaints](#)

7.3 Related Forms: N/A

7.4 Frequently Asked Questions: N/A

7.5 Other Related Information:

- Rhode Island State Law: Behavior that violates this Policy may also violate the local jurisdiction's laws where the incident occurred and subject a Respondent to criminal prosecution by the applicable jurisdiction. An individual can choose to make a report to external law enforcement at any time, and doing so does not preclude the individual from making a report to the University. Both processes can be pursued if an individual chooses to do so. Brown encourages individuals to report an incident that may violate Rhode Island state law to external law enforcement. Prompt reporting to external law enforcement is important in a criminal prosecution.
- First-degree Sexual Assault ([RIGL § 11-37-2](#))
- Second-degree Sexual Assault ([RIGL § 11-37-4](#))
- Third-degree Sexual Assault ([RIGL § 11-37-6](#))
- Stalking ([RIGL § 11-59-2](#))
- Cyberstalking and Cyberharassment ([RIGL § 11-52-4.2](#))
- Domestic Violence ([RIGL § 12-29-2](#))

8.0 Policy Owner and Contact(s)

8.1 Policy Owner: Vice President for Campus Life and Student Services

8.2 Policy Approved by: President

8.3 Contact Information: Title IX Coordinator

- titleixoffice@brown.edu
- 401-863-2026

9.0 Policy History

9.1 Policy Issue Date: February 16, 2021

9.2 Policy Effective Date: February 20, 2025

9.3 Policy Update/Review Summary:

Previous policy version(s) superseded by this policy:

- Title IX Policy, Effective Date: August 1, 2024
- Sexual and Gender-Based Misconduct Policy, Effective Date: October 25, 2023
- Sexual and Gender-Based Misconduct Policy, Effective Date: February 16, 2021

APPENDIX D

Sexual Misconduct Grievance Procedure

1.0 Standard Operating Procedure (SOP) Purpose

This Sexual Misconduct Grievance Procedure (“Grievance Procedure”) is part of the [Sexual Misconduct Policy](#) (“Policy”) and describes the procedure the University applies when it receives a Report of possible Prohibited Conduct. This Grievance Procedure therefore must be read in conjunction with the Policy. Capitalized terms used and not otherwise defined in this Grievance Procedure are defined in the Policy.

Note: For information regarding available resources or how to make a report, please refer to Section 3.3 of the Policy.

2.0 SOP

This Grievance Procedure applies to Reports and Complaints made by Covered Persons and other individuals participating in or attempting to participate in the University’s Education Program or Activity where the alleged Prohibited Conduct (a) occurred in Brown’s Education Program or Activity; or (b) creates or contributes to a Hostile Environment in Brown’s Education Program or Activity.

The University will determine the appropriate manner of resolution, if any, by the nature of the Respondent’s relationship to the University. Only Respondents who are Students or Employees at the time the Complaint is filed are entitled to the process set forth in this Grievance Procedure.

In the event a Complaint is filed against an individual who is not a Student or Employee, the Title IX Coordinator will conduct an assessment of the allegation, which may include but not be limited to gathering Relevant information, interviewing individuals with Relevant information, and consulting with individuals and offices both internal and external to Brown. After conducting the assessment, the Title IX Coordinator will determine what actions, if any, the University will take to address the allegation and eliminate and prevent any Hostile Environment in the University’s Education Program or Activity.

The University applies the policy defining the Prohibited Conduct that was in effect at the time of the alleged conduct and will determine, in its sole discretion, the applicable grievance procedure based on the date and nature of the alleged conduct and the date the Complaint is filed.

In all cases in the Grievance Procedure where a University official, including the Title IX Coordinator, is referenced, it shall include their designee.

2.1 Filing a Complaint

A Complaint must be submitted to the Title IX Coordinator. A Complaint may be filed with the Title IX Coordinator orally in person, by mail, or by electronic mail, using the contact information listed below.

Title IX and Gender Equity Office
20 Benevolent Street
titleixoffice@brown.edu

Title IX Coordinator: 401-863-2026

Title IX Case Manager: 401-863-5140

Online reporting form: [Gender Discrimination and Sexual Violence Incident Reporting Form](#)

2.2 Response to Reports and Initial Evaluation

The University will review and respond to all Reports. Upon receiving a Report, the Title IX Coordinator will promptly contact the Complainant to provide information, advise them of the availability of Supportive Measures and on- and off-campus resources, and discuss the procedural options available to the Complainant under this Policy, including the Informal Resolution Process and Formal Resolution Process. The University will also assess whether there are any immediate threats to health or safety that must be addressed.

Importantly, if the alleged conduct, if established, would not constitute a violation of this Policy, the Title IX Coordinator will inform the Complainant of any other resources and options available, which may include referring the matter for action under a separate policy. Similarly, in cases in which the Respondent is not a Brown affiliate and the Grievance Procedure would not be available to the Complainant, the Title IX Coordinator will offer Supportive Measures and take other action as appropriate, if any, to address the behavior at issue.

The Title IX Coordinator will conduct an initial evaluation typically within seven (7) days of receiving a Complaint. The initial evaluation typically includes:

- Assessing whether the reported conduct may reasonably constitute a violation of the Policy.
 - If the reported conduct does not reasonably constitute a violation of the Policy, the matter is typically dismissed from this process, consistent with the dismissal provision in this Grievance Procedure. It may then be referred to another process, if applicable.
- Determining whether the University has jurisdiction over the reported conduct, as defined in the Policy.
 - If the reported conduct is not within the University's jurisdiction, the matter is typically dismissed from this process, consistent with the dismissal provision in this Grievance Procedure. If applicable, the conduct will be referred to the appropriate University office for resolution.

At all times, the University will treat Complainants and Respondents equitably.

Note: If circumstances require, the Associate Vice President for Institutional Equity, Accessibility and Compliance will designate another person to oversee the complaint resolution process should an allegation be made about the Title IX Coordinator or the Title IX Coordinator is otherwise unavailable, unable to fulfill their duties, or has a conflict of interest.

2.3 Presumption of Non-Responsibility and Good Faith Reporting

2.3.1 Presumption of Non-Responsibility

A Respondent is presumed to be not responsible for the alleged Prohibited Conduct unless and until the Respondent is determined to be responsible for a violation of this Policy at the conclusion of the Grievance Procedure.

2.3.2 False Allegations and Statements

A determination that a Respondent was not responsible for a Policy violation does not, without more, establish that the Complainant or any other Party or witness has made a false allegation or statement in bad faith.

Deliberately false allegations and statements are a violation of University policy, and individuals, including witnesses, who knowingly make false allegations, provide false statements or evidence, tamper with or destroy evidence they were instructed to preserve, or commit similar acts of dishonesty may be subject to disciplinary action.

2.4 Conflict of Interest and Bias

The Title IX Coordinator, Investigator, Decision-Makers, Appeal Decision-Makers and facilitators of the Informal Resolution Process will be free from conflicts of interest and bias for or against Complainants or Respondents.

If a Party has concerns about bias in favor of or against a specific Complainant or Respondent, bias in favor of or against Complainants or Respondents generally, or a potential conflict of interest which involves the facilitator of an Informal Resolution Process, Investigator, Decision-Maker, or Appeals Decision-Maker, the Party should direct those concerns to the Title IX Coordinator. Concerns regarding a conflict of interest or bias that involves the Title IX Coordinator should be reported to the Associate Vice President for Institutional Equity, Accessibility and Compliance.

The Parties are expected to promptly report a concern(s) once they become aware of the alleged conflict of interest or bias.

Upon receiving a report of conflict of interest or bias, the University will evaluate the report, and if it is determined that a conflict of interest or bias exists, the University will appoint another individual to serve in the role.

2.5 Supportive Measures

Supportive Measures are non-punitive, non-disciplinary individualized measures offered as appropriate, as reasonably available, and without fee or charge to the Complainant or Respondent. Supportive Measures are designed to (a) restore or preserve that Party's access to the University's Education Program or Activity, including measures that are designed to protect the safety of the Parties or the University's educational environment; and/or (b) provide support during the Informal Resolution Process or Formal Resolution Process, without unreasonably burdening the either Party.

Supportive Measures are available before or after the filing of a Complaint, as well as in cases in which no Complaint is ever filed. Supportive Measures include, but are not limited to:

- Referral to counseling, medical, and/or other health services;
- Referral to the Employee Assistance Program;

- Referral to community-based service providers;
- Modification to campus housing assignment(s);
- Modification to work arrangements for Employees or Student-Employees;
- Safety planning;
- Campus safety escorts;
- Implementing no contact orders between Parties;
- Academic support, extensions of deadlines, or other course/program-related adjustments;
- Trespass orders;
- Timely warnings;
- Assistance with class schedule modifications, withdrawals, or leaves of absence;
- Increased security and monitoring of certain areas on campus; and
- Any other actions deemed appropriate by the Title IX Coordinator.

Changes in class, work, housing, extracurricular, and/or other activities may be made regardless of whether there is or is not a comparable alternative.

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 the Policy.

Supportive Measures may, but may not, be modified or terminated at the conclusion of the Informal Resolution Process or Formal Resolution Process.

A Party may seek modifications or reversal of the University's decision to provide, deny, modify, or terminate Supportive Measures applicable to that Party. A request to do so should be made in writing to the Title IX Coordinator. An impartial Employee other than the Employee who implemented the Supportive Measures, who has authority to modify or reverse the decision, will determine whether to provide, deny, modify, or terminate the Supportive Measures. The 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. A decision on Supportive Measures will typically be made within seven (7) days of receiving a request and a written determination will be provided to the impacted Party and the Title IX Coordinator.

Information about Supportive Measures provided to a Party will not be disclosed, including by informing one Party of Supportive Measures provided to another Party, except when necessary to provide the Supportive Measures, or restore or preserve a Party's access to the University's Education Program or Activity.

2.6 Acceptance of Responsibility

At any time prior to the rendering of a finding as to responsibility by a Decision-Maker, the Respondent may indicate that they do not wish to contest the disciplinary case against them and accept responsibility for all or part of the Prohibited Conduct alleged. Such acceptance of responsibility must be submitted to the Title IX and Gender Equity Office in writing. In the event that a Respondent accepts responsibility, the Complainant will be notified in writing. The Decision-Maker is then authorized to accept the Respondent's acceptance of responsibility and determine appropriate Discipline and/or Remedies. The Parties may

submit an impact and mitigation statement to the Decision-Maker for consideration. The Parties will thereafter be notified simultaneously in writing of the Discipline imposed and whether Remedies will be provided. This decision may be appealed as to the severity of the Discipline imposed only (See Appeal Process below). The decision is otherwise not appealable and is final.

If the Respondent accepts responsibility for only some of the Prohibited Conduct alleged, the remaining allegations will be subject to the Formal Resolution Process through conclusion.

2.7 Informal Resolution Process

An Informal Resolution Process may be offered at any time before a determination of whether Prohibited Conduct occurred has been made. This includes upon receipt of a Report, or during the pendency of the Formal Resolution Process. A Complaint need not be made in order to initiate the Informal Resolution Process. An Informal Resolution Process is not permitted if such a process would conflict with federal, state, or local law. The University may also decline to permit an Informal Resolution Process when it determines that the alleged conduct presents a future risk of harm to others.

An informal resolution is an alternative to the formal resolution, which entails an investigation and adjudication. The Informal Resolution Process is intended to create a facilitated resolution that is acceptable to both the Complainant and Respondent.

An Informal Resolution Process may occur when:

1. A Complainant or Respondent makes such a request to the Title IX Coordinator at any time prior to a Final Determination, or
2. The Title IX Coordinator may offer the option to the Parties, in writing.

Both Parties must agree to participate in the Informal Resolution Process, and the University must agree that it is appropriate. The University will obtain voluntary, written confirmation that all Parties wish to resolve the matter through the Informal Resolution Process before proceeding and will not pressure the Parties to participate in the Informal Resolution Process. As participation is voluntary, the University does not require Parties to waive the right to an investigation and adjudication as a condition of (continuing) enrollment or (continuing) employment, or the exercise of any other right.

2.7.1 Notice of Informal Resolution Request

Before initiation of an Informal Resolution Process, the Title IX Coordinator will provide the Parties with a written notice that explains:

- The allegations;
- The requirements of the Informal Resolution Process;
- That, prior to agreeing to a resolution, any Party has the right to withdraw from the Informal Resolution Process and to initiate or resume the Formal Resolution Process;
- That the Parties' agreement to a resolution at the conclusion of the Informal Resolution Process will preclude the Parties from initiating or resuming an Informal Resolution Process or Formal 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
- Any consequences resulting from participating in the Informal Resolution Process, what information the University will maintain, and whether and how it could disclose such information for use in its Formal Resolution Process.

The Complainant or Respondent will have five (5) days to respond to the informal resolution request indicating whether they have an interest in participating in the Informal Resolution Process. In the instance when a Party does not reply to the notice or a Party does not voluntarily agree to participate in the Informal Resolution Process, the University will discuss with the Complainant the option of making a Complaint, as applicable, and proceeding with the Formal Resolution Process.

2.7.2 Privacy of Informal Resolution

The existence of an informal resolution and the agreed-upon terms is considered private information maintained in the Title IX and Gender Equity Office. The existence of an informal resolution and the agreed-upon terms may be shared with a limited circle of individuals in the University who “need to know” in order to assist in implementing the agreed-upon terms; monitor the agreed upon terms; engage in a risk assessment involving the Complainant or Respondent; implement Supportive Measures; or perform University operations.

The Title IX Coordinator may use the information obtained during an Informal Resolution Process as evidence when investigating the Complaint when the terms of an informal resolution are broken or incomplete.

2.7.3 Developing Terms of the Informal Resolution

The Complainant and Respondent may propose terms for the Informal Resolution Agreement. The terms should be designed to remedy the adverse effects the alleged Prohibited Conduct has on the Complainant and/or to restore the Complainant’s equal access to the University’s Education Program or Activity. Informal resolutions between Employees will include a supervisor, senior dean, Office of the Provost, or University Human Resources who may also suggest proposed terms.

The Title IX Coordinator will review the proposed and final terms and will remove those terms that are not permissible under University policy or practice and/or federal or state law. The Title IX Coordinator may consult with the relevant University officials such as a supervisor, department chair, senior dean, Office of the Provost, Division of Campus Life, and/or University Human Resources when determining the permissibility of a proposed term.

After the Title IX Coordinator’s review, the Parties will have five (5) days from the date of delivery of the Informal Resolution Agreement to review the terms. They should indicate their willingness to accept all, some, or none of the proposed terms. They may also propose alternative strategies to meet a specific term they reject.

The Title IX Coordinator will send a Party a copy of the other Party’s response to the proposed terms. The Complainant or Respondent will have a subsequent five

(5) days from the date of delivery of the new terms to consider and respond to the revised terms.

The Informal Resolution Agreement is reached when both Parties independently and voluntarily come to an agreement on terms. The above process may be repeated as reasonably necessary to come to a final agreement. Upon agreement and signature (in hard copy or electronically) by both the Complainant and Respondent, the matter is considered resolved and closed.

2.7.4 Categories of Informal Resolution

- **Supportive Resolution:** The Title IX Coordinator will meet with the Complainant to determine reasonable Supportive Measures that are designed to restore or preserve the Complainant's access to the University's Education Program or Activity. Such measures can be modified as the Complainant's needs evolve over time or circumstances change. If the Respondent has received written notice, the Title IX Coordinator may also provide reasonable Supportive Measures for the Respondent as deemed appropriate. This option is available when the Complainant does not want to engage the other resolution options, and the Title IX Coordinator does not initiate a Complaint.
- **Educational Conversation:** The Complainant may request that the Title IX Coordinator address the allegations by meeting (with or without the Complainant) with the Respondent to discuss concerning behavior and institutional policies and expectations. These conversations are non-punitive and non-disciplinary. The Respondent is not required to attend such meetings, nor is the Respondent compelled to provide information if they attend. The conversation will be documented as the informal resolution for the matter, if it takes place. In light of this conversation, or the Respondent's decision not to attend, the Title IX Coordinator may also implement remedial actions to ensure that policies and expectations are clear and to minimize the risk of recurrence of any behaviors that may not align with Policy.
- **Accepted Responsibility:** The Respondent may accept responsibility for any or all of the alleged Policy violations at any point during the Informal Resolution Process. If the Respondent indicates an intent to accept responsibility for all alleged Prohibited Conduct, the ongoing process will be paused, and the Title IX Coordinator will determine whether Informal Resolution is an option.

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

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

When an Informal Resolution is reached, the appropriate Discipline or responsive actions are promptly implemented to effectively stop the Prohibited Conduct, prevent its recurrence, and remedy the effects of the Prohibited Conduct, both on the Complainant and the University community.

- Restorative Justice: Restorative justice is a concept and process that focuses on bringing the Parties together in facilitated dialogue about incidents that have caused harm. It centers the voice and experience of the impacted party, allowing them an opportunity to heal by processing, understanding, and articulating their experience and their needs. This process also helps individuals take active responsibility for harm they have caused and provides an opportunity for them to understand the impact of their actions on others.

If the Parties are interested in restorative justice, the Title IX Coordinator will assess whether restorative justice is appropriate. If so, then the case will be referred to the Office of Student Conduct and Community Standards.

2.7.5 Violations of the Informal Resolution

The Complainant and Respondent must identify and agree upon the consequences for violating the terms of the Informal Resolution. The Complainant and Respondent cannot agree to suspension, expulsion, or termination of employment as consequences for violating the terms of the Informal Resolution. The Title IX Coordinator will consult with the relevant University officials such as a supervisor, department chair, senior dean, Office of the Provost, or University Human Resources when determining the permissibility or appropriateness of the proposed consequences. Failure to abide by the Informal Resolution Agreement may result in appropriate responsive and/or disciplinary actions, such as the dissolution of the agreement and resumption of the Formal Resolution Process, referral to the conduct process for failure to comply, and application of the enforcement of the agreement.

2.7.6 No Right of Appeal

The Informal Resolution Process is grounded in the voluntary participation of the Complainant and Respondent. For this reason, there is no right of appeal associated with the Informal Resolution Process.

2.7.7 Time Frame for the Informal Resolution Process

The University cannot promise a definitive timeframe for an Informal Resolution Process as the time to complete the Informal Resolution Agreement is unique to each set of Complainants and Respondents. The University will strive to complete the process within sixty (60) days beginning with the Parties agreeing to participate in the Informal Resolution Process through the signing of the Informal Resolution Agreement, if applicable.

2.8 Formal Resolution Process

2.8.1 Time Frame of the Formal Resolution Process

The University makes every reasonable effort to ensure that Complaints are resolved as expediently and efficiently as possible. Many Complaints may require extensive review, and time frames will vary depending on the complexity of the investigation and the severity and extent of the alleged Prohibited Conduct. A Formal Resolution Process may take approximately one hundred and twenty (120) days.

Time frames may be extended for good cause as necessary to ensure the integrity and completeness of the process. The reasons for the extension of the time frame also include, but are not limited to compliance with a request by law enforcement; a limited accommodation of the availability of Parties, their Advisors, and witnesses; Students on a leave of absence; exam periods, school breaks, or vacations; and accounting for complexities of a specific investigation, including the number of witnesses and volume of information provided by the Parties, whether there is a counterclaim or allegations of Retaliation, and the severity and extent of the alleged Prohibited Conduct.

To enable prompt and efficient resolution of Complaints, the Title IX and Gender Equity Office expects that any individual involved in the disciplinary process will respond to outreach from the Office within two (2) days. In addition, the Title IX and Gender Equity Office expects its deadlines to be honored absent extraordinary circumstances. Requests for deadline extensions will be considered by the Title IX and Gender Equity Office on a case-by-case basis.

2.8.2 Title IX Coordinator-Initiated Complaints

In the absence of a Complaint made by a Complainant, or in the event of the withdrawal of any or all of the allegations in a Complaint, the Title IX Coordinator will determine whether to initiate a Complaint of Prohibited Conduct. Such a determination is fact-specific and will be made in consideration of factors including, but not limited to:

- 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 Sex Discrimination would occur if a Complaint is not initiated;
- The severity of the alleged Sex Discrimination, including whether, if established, the University would require the removal of the Respondent from campus or impose other Discipline to end the Sex Discrimination and prevent its recurrence;
- The age and relationship of the Parties, including whether the Respondent is an Employee;
- The scope of the alleged Sex Discrimination, including information suggesting a pattern, ongoing conduct, or conduct alleged to have impacted multiple individuals;

- The availability of evidence to assist a Decision-Maker in determining whether Sex Discrimination occurred; and
- Whether the University could end the alleged Sex Discrimination and prevent its recurrence without initiating the Grievance Procedure.

If, after considering these and other relevant factors, the Title IX Coordinator determines that the conduct as alleged presents an imminent and serious threat to the health or safety of the Complainant or other person, or that the conduct as alleged prevents the University from ensuring equal access on the basis of sex to its Education Program or Activity, the Title IX Coordinator may initiate a Complaint. Prior to doing so, the Title IX Coordinator will notify the Complainant and appropriately address reasonable concerns about their safety or the safety of others, including by providing Supportive Measures. Regardless of whether a Complaint is initiated, the Title IX Coordinator will take other appropriate prompt and effective steps to ensure that Sex Discrimination does not continue or recur within the University's Education Program or Activity.

2.8.3 Dismissal

A Complaint may be dismissed, in whole or in part, if it is determined, at any time, that:

- The University cannot identify the Respondent after taking reasonable steps to do so;
- The Respondent is not, or is no longer, participating in the University's Education Program or Activity and is not, or is no longer, employed by the University;
- The Complainant voluntarily withdraws any or all of the allegations in the Complaint, the Title IX Coordinator declines to initiate a Complaint, and without the Complainant's withdrawn allegations, the conduct that remains alleged in the Complaint, if any, would not constitute Sex Discrimination even if established; and/or
- The conduct alleged (after reasonable efforts to clarify have been made, as appropriate), if established, would not constitute Sex Discrimination.

In the event of a dismissal, Supportive Measures may still be provided to the Complainant (and Respondent, if already notified of the Complaint), and the Title IX Coordinator may refer the matter to another, appropriate office for review and response. The University will provide written notice to the Complainant (and Respondent, if already notified of the Complaint) of the dismissal, the basis for the dismissal, and the right to appeal the dismissal.

2.8.3.1 Appeal of Dismissal of Complaints

The Complainant and/or Respondent (if dismissal occurs after the Respondent has been made aware of the allegations) have the right to appeal a decision to dismiss a Complaint and any allegations therein. All dismissal appeal requests must be filed within five (5) days of the notification of the dismissal.

The Associate Vice President for Institutional Equity, Accessibility and Compliance will hear appeals for dismissal. An appeal of dismissal must be submitted to the Associate Vice President for Institutional Equity, Accessibility and Compliance within five (5) days from the written notice of the decision to dismiss. Written requests for appeals submitted by one Party will be shared with the other Party. Each Party may respond in writing to any appeal submitted by the other Party to the Associate Vice President for Institutional Equity, Accessibility, and Compliance. Written responses must be submitted within five (5) days following delivery of the written appeal notice.

The appeal should specify at least one of the grounds (see below) and provide any reasons or supporting evidence for why the ground is met. If the request for appeal does not provide information that meets the grounds in this Grievance Procedure, the Associate Vice President for Institutional Equity, Accessibility and Compliance will deny the request. If any of the asserted grounds in the appeal satisfy the grounds described in the Grievance Procedure, the Associate Vice President for Institutional Equity, Accessibility and Compliance will issue a written decision describing the result of the appeal and the rationale for the result. The Associate Vice President for Institutional Equity, Accessibility and Compliance will provide the written decision simultaneously to both the Complainant and Respondent. All appeal determinations are final and not subject to further appeal or review. The Associate Vice President for Institutional Equity, Accessibility and Compliance has seven (7) days to review and decide the appeal, though extensions can be granted at the discretion of the Title IX Coordinator, and the Parties will be notified of any extension. Appeal decisions are deferential to the original determination.

The Associate Vice President for Institutional Equity, Accessibility and Compliance may consult with the Title IX Coordinator on questions of procedure or rationale for clarification, if needed. The Title IX Coordinator will maintain documentation of all such consultation.

The grounds for dismissal appeals are limited to the following:

- Procedural irregularity that affected the outcome;
- New evidence that could change the outcome and that was not reasonably available when the dismissal was decided; and
- The Title IX Coordinator or investigator had a conflict of interest or bias for or against Complainants or Respondents generally or the individual Complainant or Respondent that affected the outcome.

2.8.4 Withdrawal of Complaint by Complainant

As noted above, a Complaint may be dismissed if the Complainant notifies the Title IX Coordinator that they would like to withdraw the Complaint. Such notice must be in writing in all cases. If a Complainant requests dismissal, they can re-file the Complaint at a later date and request a continuation of the Formal Resolution Process or voluntarily agree to an Informal Resolution Process.

The Title IX Coordinator will consider requests in light of the factors laid out in Section 2.8.2 above, relating to the Title IX Coordinator's decision to initiate a Complaint when the Complainant does not wish to do so. If the Title IX Coordinator refuses a request by a Complainant to dismiss a Complaint, the Title IX Coordinator will notify the Complainant in writing of the decision and rationale.

2.8.4.1 Withdrawal or Separation with a Complaint Pending

The University will assess the allegations and make an individualized assessment to determine whether to continue or end the Grievance Procedure upon the separation from the University of the Complainant and/or Respondent. A Complainant or Respondent may appeal a decision to dismiss a Complaint in accordance with Section 2.8.3.1.

- If a Complainant withdraws or separates from Brown after the University has given notice to the Respondent but before a finding, the University may dismiss the Complaint or continue as the Complainant.
- If a Student Respondent withdraws from Brown after the University has given notice to the Respondent but before a Final Determination, the Complaint may be dismissed, and an entry will be made on their academic transcript maintained by the Office of the Registrar that indicates the Student has withdrawn with a disciplinary investigation and/or charges pending.
- If an Employee Respondent separates or is terminated from Brown after the University has given notice to the Respondent but before a Final Determination, the Complaint may be dismissed, and an entry will be made in their personnel file that indicates that the Employee separated with the disciplinary investigation and/or charges pending or employment terminated with a disciplinary investigation and/or charges pending.
- If a Complainant or Respondent withdraws or permanently separates from the University after submitting an appeal but before the appeal is decided, the University will dismiss the appeal and uphold the finding as the final resolution to the Complaint. The University may make a retroactive entry on the Student's academic transcript or the Employee's personnel file indicating the original Discipline (if applicable).

2.8.4.2 Leave of Absence with a Complaint Pending

If a Complainant or Respondent takes a leave of absence from Brown after the University has given notice to the Respondent but before a Final Determination, the resolution process may be put on hold or continue as appropriate. The Title IX Coordinator will make an individualized assessment to determine whether to hold or continue with the resolution process.

If the resolution process is held due to the leave of absence of a Student Respondent, their academic transcript will be held in accordance with the process provided for above, and a temporary entry may be made on their academic transcript indicating that the Student has taken a leave of absence with a disciplinary investigation or charges pending.

If the resolution process is held due to the leave of absence of an Employee Respondent, a temporary entry will be made in their personnel file indicating that the Employee has taken a leave of absence with disciplinary investigation or charges pending.

2.8.5 Consolidation of Complaints

In cases in which allegations of Prohibited Conduct are connected to allegations of discrimination or harassment by the Respondent based on another protected category, or are otherwise connected to other alleged misconduct by the Respondent, which would ordinarily be addressed by other Brown policy, the University may, in its sole discretion, address all related conduct in a consolidated manner.

Similarly, the University may, in its sole discretion, consolidate Complaints of Prohibited Conduct brought against more than one Respondent, or by more than one Complainant against one or more Respondents, or by one Party against another Party (“cross-complaints”), where the allegations arise out of the same facts or circumstances.

2.8.6 Notice of Investigation and Allegation

The Formal Resolution Process begins with the Title IX Coordinator sending the Parties a written Notice of Investigation and Allegation (“NOIA”).

The NOIA will include:

- information about the availability of an Informal Resolution Process and a Formal Resolution Process, as outlined in this Grievance Procedure;
- the identities of the Parties involved in the incident, if known, the conduct allegedly constituting Prohibited Conduct, and the date and location of the alleged incident, if known;
- a statement about the University’s prohibition on Retaliation;
- a statement that the Parties may inspect and review evidence (in accordance with “Evidence Review and Final Investigation Report” section below);
- a statement that the Parties are entitled to an investigative report summarizing all present Relevant and not otherwise impermissible evidence;
- a statement that the Respondent is presumed not responsible for the alleged Prohibited Conduct until a determination regarding responsibility is made at the conclusion of the Formal Resolution Process, after the Parties have had an opportunity to present Relevant and not otherwise impermissible evidence to a trained, impartial Decision-Maker;
- information regarding the Parties’ right to have an Advisor of their choice, who may be, but is not required to be, an attorney;
- a statement that Brown prohibits Parties from knowingly making false statements or knowingly submitting false information during any process outlined in this Grievance Procedure.

If the University has reasonable concerns for the safety of any person as a result of providing this NOIA, it may reasonably delay in providing it in order to address the

safety concern appropriately. Reasonable concerns must be based on individualized safety and risk analysis and not on mere speculation or stereotypes.

Amendments and updates to the NOIA may be made if, as the investigation progresses, the University decides to investigate additional allegations of Prohibited Conduct not included in the original NOIA about the Respondent's conduct toward the Complainant, or which are otherwise consolidated with the ongoing investigation.

2.8.7 Advisors

The parties may each have an Advisor of their choice present with them for all meetings and interviews within the resolution process if they choose. The parties may select whomever they wish to serve as their Advisor as long as the Advisor is eligible and available to abide by the time periods and deadlines stated in this process.

Choosing an Advisor who is also a witness in the process creates a potential for bias and conflict of interest. A party that chooses an Advisor who is also a witness can anticipate that the Decision-Maker will explore issues of potential bias.

The University may permit parties to have more than one Advisor, or an Advisor and support person, 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.

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 of the identity of their Advisor at least two (2) days before the date of their first meeting with the investigator, (or as soon as possible if a more expeditious meeting is necessary or desired). The Parties are expected to notify the Title IX Coordinator promptly if they change Advisors at any time. If a party changes Advisors, consent to share information with the previous Advisor is assumed to be terminated.

A pool of Employees are trained as process Advisors. Process Advisors are available to the Complainant or Respondent upon request, subject to the process Advisor's availability. The Advisor is not required to be chosen from this pool or an individual from the University community.

2.8.7.1 Selection or Appointment of Advisors

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 inside or outside of the Brown community.

The Title IX Coordinator will offer to assign a trained Advisor to any Party if the Party chooses. The University cannot guarantee equal advisory rights, meaning that if one Party selects an Advisor who is an attorney, but the other Party does not or cannot afford an attorney, the University is not obligated to provide an attorney to advise that Party.

Advisors appointed by the University cannot be confidential Employees, and although they will not be asked to disclose details of their interactions with their advisees to institutional officials or Decision-Makers absent an emergency, they are still reminded of their mandatory reporter responsibilities.

2.8.7.2 Role of the Advisor

The Parties may be accompanied by their Advisor in all meetings, interviews, and any hearing at which the Party is entitled to be present, including intake and interviews. If a Party has more than one Advisor, only one Advisor may attend each meeting, interview, or hearing. Advisors should help the Parties prepare for each meeting and are expected to advise ethically, with integrity, and in good faith.

An Advisor cannot speak to the investigator, Decision-Maker, or other participants in the hearing or ask questions in any other step of the hearing. The Parties are expected to ask and respond to questions on their own behalf throughout the resolution process.

2.8.7.3 Privacy of Records Shared with Advisors

Advisors are expected to maintain the confidentiality of the records shared with them. Advisors may not disclose any University work product or evidence the University obtained solely through the resolution process for any purpose not explicitly authorized by the University. Accordingly, Advisors will be asked to sign a Non-Disclosure Agreement (NDA). The University may decline to share materials with any Advisor who has not executed the NDA. The University may seek to restrict the role of an Advisor who does not respect the sensitive nature of the process or who fails to abide by the University's privacy expectations.

2.8.7.4 Expectations of Advisors

The University generally expects an Advisor to adjust their schedule to allow them to attend meetings, interviews, and/or hearings when planned but may change scheduled meetings to accommodate an Advisor's inability to attend upon a showing of good cause if doing so does not result in an unreasonable delay.

The University may also make reasonable provisions to allow an Advisor who cannot attend in person to attend a meeting by telephone or video conferencing.

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

2.8.7.5 Advisor's Violations of University Policy

Any Advisor who oversteps their role as defined in this Grievance Procedure, who shares information or evidence in a manner inconsistent

with this Grievance Procedure, or who refuses to comply with the University's established rules of decorum will be warned. If the Advisor continues to disrupt or otherwise fails to respect the limits of the Advisor role, the meeting/interview/hearing may be ended or other appropriate measures implemented, including the University requiring the Party to use a different Advisor or providing a different University-appointed Advisor. Subsequently, the Title IX Coordinator will determine how to address the Advisor's non-compliance and future role.

Advisors should not address University officials in a meeting or interview unless invited to (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 or Decision-Maker.

2.8.8 Investigation

2.8.8.1 Timeframes for the Investigation

The investigation will be adequate, reliable, fair, and impartial, and will be completed in a reasonably prompt timeframe, typically ninety (90) days.

Any timelines provided herein create no rights for the Parties and may be extended or changed by the University for good cause shown, in the University's sole discretion. Good cause may exist if additional time is necessary to: accommodate the availability of a Party or witness; comply with a request by law enforcement for a temporary delay to gather evidence, address the need for language assistance or accommodation of disabilities; ensure the integrity and completeness of the investigation, including to account for case complexities, e.g., the number of Witnesses and the volume of information provided by the Parties; account for University breaks or vacations; or for other legitimate reasons. Extensions to accommodate an Advisor's schedule, including scheduling of interviews or hearings, will be considered if they do not unduly delay the process, which is considered to be a delay of three (3) or more days.

In the event a deadline is extended or changed, the Title IX Coordinator will provide the Complainant and Respondent with written notice of the reason for and expected duration of the delay or extension of timeframes.

2.8.8.2 Role of the Investigator

The University will appoint a trained investigator or investigators — who may or may not be the Title IX Coordinator — to conduct the fact-finding for the case, objectively evaluate the Relevance of all evidence, and prepare an investigation report that contains a fair summary of the Relevant evidence. The Title IX Coordinator will have the discretion to determine whether the Investigator will be internal (an Employee at Brown) or external (a qualified individual outside of the Brown community), or a combination of both internal and external investigators.

Each Party will have the equal opportunity to gather and present Relevant evidence (both inculpatory and exculpatory) and fact witnesses to the

investigator. However, the burden of gathering evidence, and satisfying the standard of proof, is on the University.

The Investigator will meet with each Party and Relevant witnesses. Video or audio recordings of investigative interviews are not permitted by the Parties, their Advisors, or witnesses. After an interview, Parties and witnesses will have the opportunity to review a summary of their statement to the investigator before it is included in the draft investigation report. If a Party or witness does not provide comments to the summary of their statement within three (3) days, objections to the accuracy of the summary will be deemed to have been waived, and no changes will be permitted.

2.8.8.3 Witnesses

As noted above, the Complainant, Respondent, and witnesses are permitted to provide names of potential witnesses to the investigator. The investigator will determine which of those potential witnesses, or other persons, may have Relevant evidence about the alleged conduct and may request statements, either orally or in writing. Witnesses may include individuals from outside of the Brown community.

Employees (not including Complainant and Respondent), and others authorized by the University to provide aid, benefits, or services as part of the University's Education Program or Activity, are required to cooperate with and participate in the University's investigation and resolution process, including by attending all scheduled meetings and proceedings and, upon request, participating as a witness. Student witnesses and witnesses from outside Brown's community cannot be required to participate. Although the University cannot compel Parties or non-Employee witnesses to answer questions during the interview or submit documents, all Parties and witnesses are encouraged to do so. A person's decision not to participate in the investigation, in whole or in part, will be documented in the investigative report.

Witnesses do not have a right to an Advisor. Witnesses cannot participate in an investigation and remain anonymous.

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

2.8.8.4 Evidence

Complainants, Respondents, and witnesses are permitted to provide evidence to the investigator. Evidence includes but is not limited to text messages, email exchanges, timelines, receipts, photographs, and videos. The investigator may also gather and consider additional documents, items, and other Relevant information.

- **Pattern Evidence:** A report of Prohibited Conduct which could reasonably establish a pattern of conduct. The investigator may consider this as pattern evidence regardless of whether there has

been a prior finding of a Policy violation. Pattern evidence may occur before or after the alleged Prohibited Conduct in question. This information may be deemed Relevant to determine whether the conduct alleged violates the Policy and/or to assign appropriate Discipline.

- **Character Evidence:** Information that does not directly relate to the facts at issue, but instead reflects upon the reputation, personality, qualities, or habits of an individual is character evidence. Character evidence is generally not Relevant.
- **Complainant's Sexual Interests and Prior Sexual History:** Questions and evidence about the Complainant's sexual interests and prior sexual behavior are generally not Relevant. Questions and evidence about the Complainant's prior sexual behavior are only considered Relevant in two circumstances: when the questions and evidence are offered to prove that someone other than the Respondent committed the conduct alleged by the Complainant; and when the questions and evidence concern specific incidents of the Complainant's prior sexual behavior with respect to the Respondent and are offered to prove consent. The fact of prior consensual sexual conduct between the Complainant and Respondent does not by itself demonstrate or imply the Complainant's consent or preclude a determination that sex-based harassment occurred.
- **Other Disciplinary Cases:** Information about prior, concurrent, or pending campus disciplinary cases or criminal charges involving the Complainant or Respondent is typically viewed as not Relevant to the investigation unless determined to be pattern evidence, as described above. Such information may be considered in determining appropriate Discipline upon a determination of responsibility. Barring a pattern allegation, this information is only considered at the discipline stage of the process and is not shared until then.
- **Privileged Information:** The University will not require, allow, rely upon, or otherwise permit questions or use of evidence that constitute, or seek disclosure of, information protected under a legally recognized privilege. Notwithstanding the foregoing, if a person holding such a privilege has waived the privilege in writing, then the information may be used during an investigation and/or live hearing. In gathering evidence, the University will not access, consider, disclose, or otherwise use a Party's records that are made or maintained by a physician, psychiatrist, psychologist, or other recognized professional or paraprofessional acting in the professional's or paraprofessional's capacity, or assisting in that capacity, and which are made and maintained in connection with the provision of treatment to the Party, unless the University obtains that Party's voluntary, written consent to do so.

2.8.8.5 Evidence Review and Draft Investigation Report

At the conclusion of the investigation, the Investigator prepares a draft investigation report containing a fair summary of the Relevant evidence collected during the investigation that will be submitted to both Parties

for their review and response. The Investigator may include credibility assessments in the investigation report, where appropriate, based on the investigator's interviews with the Complainant, Respondent, and witnesses, and review of the Relevant evidence. The credibility assessment may include direct observations, reasonable inferences drawn from the facts, and any consistencies or inconsistencies between the various sources of information.

The Title IX Coordinator will review the draft investigation report before it is provided to the Parties. The Title IX Coordinator may return the draft investigation report to the investigator to address questions or provide clarification.

To protect the privacy of the Parties and safeguard the contents of the investigation report, the draft investigation report will be sent through an electronic format that limits the Parties' ability to edit, download, or print the draft investigation report.

The Parties will have seven (7) days from the date of delivery to review the draft investigation report and the evidence and submit a written response to the Title IX Coordinator for the investigator to consider prior to the finalization of the investigation report. In their written response, the Complainant and Respondent may offer comments, clarify information previously shared, suggest additional witnesses, question Relevance determinations, and/or identify any other Relevant evidence or witnesses to assure the thoroughness and sufficiency of the investigation.

2.8.8.6 Final Investigation Report

Upon consideration of the responses submitted by the Parties, the investigator may request additional information or interview additional witnesses. Upon completion of the investigation, the investigator finalizes the investigation report and provides the report to the Title IX Coordinator. The Title IX Coordinator will review the report and may return the report to the investigator to address questions or provide clarification.

When it is deemed final, the Title IX Coordinator reviews the report containing a fair summary of the Relevant evidence collected and within seven (7) days determines whether the University will proceed to a hearing or dismiss the Complaint as described above.

At least seven (7) days prior to the hearing, the Title IX Coordinator will provide electronic access to the final investigation report to the Parties and to the Decision-Maker.

To protect the privacy of the Parties and safeguard the contents of the investigation report, the final investigation report will be sent to the Parties through an electronic format that limits the Parties' ability to edit, download, save, or print the final investigation report.

The Parties may review the final investigation report and the evidence and submit a written response to the Decision-Maker at least three (3)

days before the hearing date. In their written response, the Complainant and Respondent may offer comments, clarify information previously shared, suggest additional witnesses, question relevance determinations, and/or identify any other Relevant evidence or witnesses to assure the thoroughness and sufficiency of the investigation.

2.8.9 Standard of Evidence

The University applies the preponderance of the evidence standard (more likely than not) in all stages of the process when determining whether the Policy has been violated.

2.8.10 Hearing Procedures

Section 2.8.10.2.1 below describes the role and responsibilities of the “Hearing Officer,” who presides at the live hearing in a case involving a Student and Staff Respondent. Sections 2.8.10.2.2 through 2.8.10.2.4 below describe the respective roles of the “Chair of the Title IX Council,” the “Hearing Panel,” and the “Presiding Officer,” who each participate in the live hearing in a case involving a Faculty Respondent. Within the Grievance Procedure, all references to the “Hearing Officer” shall apply only to a Student and Staff Respondent case, while all references to the “Chair of the Title IX Council,” the “Hearing Panel,” and the “Presiding Officer” shall apply only to a Faculty Respondent case.

The Title IX Coordinator will select a date for a live hearing based on the availability of the Decision-Maker and will consider participants’ academic or work schedules when identifying the hearing date. The Title IX Coordinator will not consider an Advisor’s schedule when selecting a hearing date. Advisors will need to work with their advisees around scheduling.

A hearing will be scheduled for a date at least seven (7) days after the final investigative report is provided to the Parties. Typically a hearing will be held within fifteen (15) days from the date that the final investigative report was provided. This timeframe may be extended for good cause as provided for in this Grievance Procedure. If granted, the reason for the extension will be shared with the Parties in writing.

The live hearing will be scheduled to take place via an online platform through which each Party, their Advisors, witness, and the Decision-Maker can see and hear each other in real-time when the individual is speaking. The University requires the Parties to be on camera during questioning and when making statements. The Parties will be muted and off-camera during the other phases of the hearing. An audiovisual recording of any live hearing will be made by the University. No other recording or transcription is permitted.

If the matter involves more than one Respondent, the Title IX Coordinator, in their discretion, may permit the hearing concerning each Respondent to be conducted either jointly or separately. In joint hearings, separate determinations of responsibility will be made for each Respondent.

The Parties will be notified in writing of the date, time, and access information for the hearing.

2.8.10.1 Pre-Hearing Meetings

The Decision-Maker will offer to convene a pre-hearing meeting with the Parties and their Advisors and invite them to submit the questions or topics they wish to ask or discuss at the hearing. This allows the Decision-Maker to consider their relevance ahead of time to avoid any improper evidentiary introduction in the hearing and to provide recommendations for more appropriate phrasing.

This advance review opportunity does not preclude the Parties from submitting a question at the hearing for the first time or asking for a reconsideration on a Decision-Maker's pre-hearing decision based on any new information or questioning offered at the hearing. The Decision-Maker will document and share their rationale for any evidence or question exclusion, if any, at a pre-hearing meeting with each Party.

The Decision-Maker will work with the Parties to finalize a witness list for the hearing, and the Title IX Case Manager will notify any witnesses of the hearing's logistics.

The pre-hearing meeting will not be recorded. The pre-hearing meetings will typically be conducted as separate meetings with each Party and their Advisor and may be conducted via video conferencing. The Decision-Maker will work with the Parties to establish the format and timing of the meetings and will circulate a summary of any rulings made to ensure all Parties and Advisors are aware.

2.8.10.2 Hearing Participants

Persons who may be present for a hearing include the Decision-Maker, investigator, the Parties and their Advisors, Presiding Officer, anyone providing authorized accommodations, interpretation, and/or assistive services, anyone else deemed necessary by the Decision-Maker, and staff from the Title IX and Gender Equity Office providing administrative support. Witnesses are present only during their portion of the questioning.

2.8.10.2.1 Hearing Officer (Student and Staff Respondent Cases Only)

A single Hearing Officer presides at the hearing and decides a case involving a Student and Staff Respondents. The Hearing Officer receives training to hear and decide Complaints investigated under the Policy.

The Hearing Officer is responsible for administering the hearing process, including procedural matters and decisions leading up to the hearing. The Hearing Officer has the discretion and authority to make relevancy determinations during the hearing, including appropriate and inappropriate lines of questioning. The Hearing Officer is also responsible for drafting the determination letter that summarizes the findings, rationale, and Discipline (if applicable).

Following the hearing, the Hearing Officer shall determine whether or not the Student or Staff Respondent has violated the Policy by a preponderance of the evidence and make the determination regarding responsibility or non-responsibility and Discipline (if applicable). The Hearing Officer shall draft a written determination in accordance with Section 2.8.11.1 below.

2.8.10.2.2 Chair of the Title IX Council (Faculty Respondent Cases Only)

During the hearing in a case involving a Faculty Respondent, the Chair of the Title IX Council (“Chair”) participates as a trained non-voting member. The Chair is responsible for administering the hearing process and conducting the deliberations process, including procedural matters and decisions leading up to the hearing. The Chair is also responsible for drafting the written determination letter in accordance with Section 2.8.11.1 below which summarizes the hearing’s findings, rationale, and recommended Discipline (if applicable).

2.8.10.2.3 Hearing Panel (Faculty Respondent Cases Only)

The Hearing Panel decides cases involving Faculty Respondents. The Hearing Panel is comprised of individuals who receive training to hear Complaints investigated under the Policy. The Title IX Coordinator will send the Hearing Panel a copy of the final investigation report at least seven (7) days before the date of the hearing. At the conclusion of the hearing, the Hearing Panel will convene to deliberate and render a decision, by majority vote, regarding whether or not the Respondent has violated the Policy by a preponderance of the evidence and recommend Discipline to the Provost (if applicable). No member may abstain from voting.

A Hearing Panel where the Complainant is a faculty member will consist of three (3) faculty members drawn from the Title IX Council. If the Complainant is a staff member, the Hearing Panel will consist of four (4) faculty members and one (1) staff member drawn from the Title IX Council. If the Complainant is a Student, the Hearing Panel will consist of four (4) faculty members and one (1) Student drawn from the Title IX Council. The Hearing Panel will deliberate and make a determination regarding responsibility and a recommendation regarding Discipline (if applicable). The Senior Academic Dean of the Respondent may be substituted for the Hearing Panel in instances in which the Title IX and Gender Equity Office is unable to populate a hearing panel due to urgency, time of year, or conflict of interest.

2.8.10.2.4 Presiding Officer (Faculty Respondent Cases Only)

During the live hearing in a case involving a Faculty Respondent, the Presiding Officer has the responsibility and authority to ensure the overall decorum of the hearing. The Presiding Officer is also responsible for making relevancy determinations about information that will be considered or not during the hearing, including appropriate and inappropriate lines of questioning. The Presiding Officer does not participate in the Hearing Panel's deliberations nor make any recommendations regarding the determination of the case. The Title IX Coordinator will send the Presiding Officer a copy of the final investigation report at least seven (7) days before the date of the hearing.

2.8.10.3 Evidentiary Considerations

The Parties must provide all evidence to the investigator prior to completion of the final investigative report. Relevant evidence not provided in advance of the hearing may be accepted for consideration in the discretion of the Decision-Maker. The Decision-Maker typically will not accept newly offered evidence, even if Relevant, if it was reasonably available to the offering Party prior to the conclusion of the final investigation report.

If the Decision-Maker decides to accept newly offered Relevant evidence, the Decision-Maker may, in their discretion, take any of the following actions: pause or adjourn the hearing so that the Parties may review the evidence; or remand the matter to the Investigator for further investigation and analysis.

2.8.10.4 Introductions and Hearing Procedure Explanation

The Hearing Officer (for Student and Staff Respondent cases) and the Presiding Officer (for Faculty Respondent cases) will explain the hearing procedures and introduce the participants and will answer any procedural questions prior to and as they arise throughout the hearing.

2.8.10.5 Opening Statements

The Complainant and Respondent will have the opportunity to provide a verbal opening statement. If both the Complainant and the Respondent choose to make an opening statement, the Complainant will make an opening statement first, and the Respondent will make an opening statement second.

The Decision-Maker will disregard opening statements or any portions thereof that are not Relevant and will note that decision on the record.

2.8.10.6 Investigator Presentation of Final Investigation Report

The Investigator will present a summary of the final investigation report, including a review of the facts that are contested and those that are not. The investigator will 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 questioning at the Decision-Maker's discretion.

2.8.10.7 Questioning

At the hearing, the Decision-Maker will question Parties and witnesses to adequately assess a Party's or witness's credibility, to the extent credibility is both in dispute and Relevant to evaluating the allegations of Prohibited Conduct. Any credibility determinations will not be based on a person's status as a Complainant, Respondent, or witness. The Decision-Maker will accomplish this by asking the Parties and witnesses Relevant (not otherwise impermissible questions) and follow-up questions, including questions challenging credibility.

Parties may suggest questions to be posed by the Decision-Maker during the pre-hearing meetings and/or by submission of written questions during the hearing. During the hearing, all questions by the Parties must be directed toward and asked through the Decision-Maker and are subject to a relevance determination before they are asked. At the hearing, Parties can submit their questions to the Title IX Case Manager, through the direct message function, who will then submit the questions to the Decision-Maker. Questions that the Parties want to have posed can be questions for that Party, themselves, the other Party, or witnesses.

The Hearing Officer (for Student and Staff Respondent cases) and Presiding Officer (for Faculty Respondent cases) will limit or disallow questions that are not Relevant, including questions that are unduly repetitious (and thus irrelevant), or that seek or pertain to impermissible evidence. All Relevant (not otherwise impermissible) questions will be asked by the Decision-Maker. Questions that are unclear or harassing of the Party or witness being questioned may be excluded, but prior to doing so, the Decision-Maker will give the Party posing the question the opportunity to clarify or revise the question. The Hearing Officer (for Student and Staff Respondent cases) and Presiding Officer (for Faculty Respondent cases) make the final decision on all questions and determinations of relevance and appropriateness.

The Hearing Officer (for Student and Staff Respondent cases) and Presiding Officer (for Faculty Respondent cases) will explain any decision to exclude questions not Relevant, or to reframe it for relevance.

The Decision-Maker(s) then poses the questions deemed Relevant, not impermissible, and appropriate to the Party and/or witness.

2.8.10.8 Refusal to Submit to Questioning and Inferences

If a Party or witness, after being provided notice, does not appear at the hearing, the hearing will take place in their absence. When a Party or witness does not appear for the hearing, or appears but refuses to answer questions, the Decision-Maker will make their determination using the evidence available. The Decision-Maker may choose to place less or no weight upon statements by a Party or witness who refuses to respond

to questions deemed Relevant (and not otherwise impermissible). 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.

Employee witnesses are required to participate in the hearing if they are reasonably available.

2.8.10.9 Closing Statements

The Complainant and Respondent will be granted the opportunity to make a verbal closing statement to the Decision-Maker. The Decision-Maker will disregard closing statements or any portions thereof that are not Relevant.

2.8.11 Determining Responsibility and Appropriate Discipline

2.8.11.1 Determining Responsibility

After closing statements from the Parties, the Decision-Maker will deliberate in a closed session to objectively evaluate all Relevant evidence, both inculpatory and exculpatory, and determine whether the Respondent is responsible for the alleged Policy violation based on a preponderance of evidence.

2.8.11.2 Determining Appropriate Discipline

If the Decision-Maker for Student and staff Respondent cases determines that a Respondent is responsible for one or more violations of the Policy, it will then impose an appropriate Discipline. If the Decision-Maker for faculty Respondent cases determines that a Respondent is responsible for one or more violations of the Policy, it will then recommend appropriate Discipline to the Provost.

The Decision-Maker for all Respondents shall consider, among others, the following factors in determining (for Student and staff Respondent cases) and recommending (for faculty Respondent cases) appropriate Discipline:

- Whether or not the circumstances suggest there is an increased risk of the Respondent committing additional acts of Prohibited Conduct or violence, considering, for example, whether there have been other sexual violence Complaints about the same Respondent, whether the Respondent has a history of violence, whether the Respondent threatened further sexual violence or other violence against the Complainant or others;
- Whether or not the circumstances suggest there is an increased risk of future acts of Prohibited Conduct under similar circumstances, considering, for example, whether the circumstances reveal a pattern of perpetration, for instance via illicit use of drugs or alcohol, at a given location, or by a particular group;
- Whether or not the Prohibited Conduct was perpetrated with a weapon or had other aggravating considerations;
- Whether the Respondent, upon return to campus, would be likely to

- pose a threat to the safety and/or well-being of the Complainant and/or the Brown community generally, and if so, the nature and extent of the threat and steps to effectively mitigate the impact;
- Whether the Respondent has been found responsible for prior violations of Brown policies;
- The impact of the conduct on the Brown community and the need for any Discipline or remedies to eliminate, prevent, or address the existence of any hostile environment caused in the Brown community or to maintain a safe and respectful environment conducive to learning, working, and living; and
- Any other mitigating, aggravating, or compelling circumstances in order to reach a just and appropriate resolution in the case.

2.8.11.3 Written Determination

The Decision-Maker will typically prepare a written determination within five (5) days from the date of the hearing. The Hearing Officer or Chair may ask for additional time for deliberation. The Title IX Coordinator will notify the parties in writing if additional time is needed.

The written determination will include: (1) a description of the alleged Prohibited Conduct; (2) information about the policy and procedures used to evaluate the allegations; (3) the Decision-Maker's evaluation of the Relevant (not otherwise impermissible) evidence; (4) the determination of whether the Respondent was responsible or not responsible for Prohibited Conduct; (5) if responsible, the specific behaviors for which Respondent was found to be responsible; and (6) appeal information. In the event a Student or staff Respondent is found responsible for a violation of this Policy, the determination will include the Discipline imposed and/or whether Remedies will be provided, as appropriate. In the event a faculty Respondent is found responsible for a violation of this Policy, the determination will include the Discipline recommended and/or whether Remedies will be recommended, as appropriate. The process for imposing Discipline on Faculty Respondents is provided for in Section 2.8.11.4.

In all cases, the Complainant and Respondent will be provided notice of the written determination regarding responsibility simultaneously. The appropriate campus officials, e.g., the senior dean, department chair, University Human Resources and supervisors, and deans in the Division of Campus Life, will receive a copy of the outcome as appropriate.

In cases of expulsion or termination (except in cases of termination of a term appointment or revocation of tenure of faculty Respondents, which is provided for in Section 2.8.11.4), once the appeal deadline has passed or an expulsion or termination is upheld by the Appeal Decision-Maker, the Respondent's enrollment or employment will end and the Respondent must vacate campus immediately.

In cases of suspension of a Student Respondent: once the appeal deadline has passed or a suspension is upheld by the Appeal Decision-Maker, the start of the Respondent's suspension will be determined by the date on which the final decision is made. Suspensions imposed before the end of the sixth week of classes will begin immediately and apply to the current semester. Suspensions imposed after the sixth week of classes will apply to the next semester.

2.8.11.4 Determining Discipline for Faculty Respondents

The Hearing Panel's written decision finding that the faculty Respondent violated the Policy and recommending Discipline will be forwarded to the Provost within two (2) days of the decision being shared with the Complainant and Respondent. The Provost shall consider the written decision setting out the Hearing Panels finding and recommendation and may consider any part of the record before the Hearing Panel that the Provost deems appropriate. The Provost may meet with the Hearing Panel to discuss their recommendation and may afford the Complainant and Respondent the opportunity to discuss the Hearing Panel's recommendation. The Provost shall also consider the factors set forth in Section 2.8.11.

If the Provost determines that termination of a term appointment or revocation of tenure is the appropriate Discipline for violating the Policy, then such a determination will be a recommendation to the President that such Discipline be imposed and will be forwarded to the President in writing for consideration. The President will consider any recommendation by the Provost to terminate a faculty Respondent's term appointment or to revoke a faculty Respondent's tenure. In considering the Provost's recommendation, the President may also review the written decision setting out the Hearing Panel's finding and recommendation and consider any part of the record before the Hearing Panel that the President deems appropriate. The President may afford the Complainant and Respondent the opportunity to discuss the recommendation. If the President determines that the circumstances require a recommendation to the Corporation that the faculty Respondent be dismissed during either a term appointment or tenure, the President shall so recommend in writing to the Corporation. The Corporation's decision on the President's recommendation will be final.

If the Provost determines that Discipline other than termination of a term appointment or revocation of tenure is the appropriate Discipline for violating the Policy is appropriate, then that Discipline will be final unless either Party appeals. The Provost's determination will be communicated simultaneously in writing to the Parties, the President, the appropriate senior dean, and the Chair of the Faculty Executive Committee or Chair of the Medical Faculty Executive Committee (as appropriate).

The Provost will complete the process for recommending/imposing Discipline as set forth in this section within ten (10) days of receipt of the Hearing Panel's written decision.

2.8.12 Appeal Process

The Complainant and Respondent both have the right to appeal a determination of responsibility and/or Discipline on the limited grounds of (a) a procedural irregularity that affected the outcome of the matter; (b) new evidence that could affect the outcome and that was not reasonably available at the time the determination regarding responsibility was made; (c) in situations where the Respondent is suspended, expelled, or terminated, the Discipline fall outside the range of Discipline designated for this offense, considering the cumulative conduct/disciplinary record of the Respondent; or (d) the Title IX Coordinator, investigator, or Decision-Maker had a conflict of interest or bias for or against Complainants or Respondents generally or the individual Complainant or Respondent that affected the outcome of the matter. Any alleged new evidence related to the grounds for the appeal should be appended to the appeal. The appeal is not an opportunity for a re-investigation or re-hearing.

Written requests for appeal must be submitted to the Title IX and Gender Equity Office within five (5) days following delivery of the written determination regarding responsibility. Written requests for appeals submitted by one Party will be shared with the other Party. Each Party may respond in writing to any appeal submitted by the other Party. Written responses to an appeal must be submitted within five (5) days following delivery of the notice of the written appeal. The Request for Appeal will be forwarded to the appropriate Appeal Decision-Maker.

Appeals are heard by the President in cases with a faculty Respondent, the Vice President of Human Resources in cases with a staff Respondent, and a three (3) member appeal panel drawn from the Title IX Council in cases with a Student Respondent. The individuals hearing appeals are referred to in the Grievance Procedure as Appeal Decision-Makers. The Appeal Decision-Maker's responsibility will be strictly limited to determining if the written appeal meets the limited grounds on which an appeal is submitted. The appeal will be granted if the Appeal Decision-Maker finds that the grounds for appeal are met. Otherwise, the appeal will be denied. If the appeal is denied, the matter is closed and the original written determination regarding responsibility and Discipline, if applicable, stands as the final decision.

Appeal decisions are to be deferential to the original determination and the review will be based only on the written record, as well as any recordings. All decisions are made by a majority vote (for appeal panels).

The Appeal Decision-Maker may consult with the Title IX Coordinator, original Decision-Maker, 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.

An appeal may be granted or denied. If the Appeal Decision-Maker grants the appeal, they may (a) modify the determination of responsibility and/or Discipline, or (b) remand (or partially remand) the case to the original Decision-Maker or a new Decision-Maker with corrective instructions for reconsideration. In rare circumstances where an error cannot be cured by the original or new Decision-Maker or the Appeal Decision-Maker, the Appeal Decision-Maker or Decision-

Maker may reopen the investigation or order a new investigation.

A Notice of Appeal Outcome letter will be sent to all Parties simultaneously. The outcome will specify the finding on each ground for appeal, any specific instructions for remand or reconsideration, any Discipline that may result which the University is permitted to share according to federal or state law, and the rationale supporting the essential findings to the extent the University is permitted to share under federal or state law.

Any Discipline as a result of the determination will not be implemented during the appeal process, and Supportive Measures may be maintained or reinstated until the appeal determination is made.

2.8.13 Prohibition on Recording

Parties, Advisors, and witnesses are prohibited from audio or video recording any part of the resolution process. The resolution process includes but is not limited to (a) telephone calls and virtual or in-person meetings with any member of the Title IX and Gender Equity Office staff; (b) telephone calls and virtual or in-person interviews or meetings with the investigator; and (c) the hearing.

Allegations of non-compliance will be reviewed by the Office of Student Conduct and Community Standards for Students, University of Human Resources for staff, and the Office of the Provost for faculty and may result in discipline, up to and including separation from the University. The Parties are responsible for their Advisors' compliance with this provision and may be subject to discipline for any violation by their Advisor.

2.8.14 Failure to Comply with Discipline or Informal Resolution Agreement

All Respondents are expected to comply with the assigned Discipline or Informal Resolution Agreement terms within the timeframe specified by the Decision-Maker, including the Appeal Decision-Maker or the Informal Resolution Agreement.

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

Supervisors are expected to enforce the completion of Discipline for their Employees.

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

2.8.15 Disability Accommodations and Support During the Resolution Process

Brown is committed to providing reasonable accommodations and support to qualified Students, Employees, or others with disabilities that would enable them to participate in all processes provided for under this Grievance Procedure, including, but not limited to, making a Report or Complaint and participating in an Informal Resolution Process or Formal Resolution Process.

Students with disabilities who would like to request a reasonable accommodation

should contact Student Accessibility Services (SAS) at SAS@brown.edu or 401-863-9588. Faculty and staff with disabilities who would like to request a reasonable accommodation should contact University Human Resources (UHR) and visit this website for more information: [UHR Employee Accommodation Services](#). The Title IX Coordinator may consult, as appropriate, with SAS and/or UHR.

A Party should not assume that the Title IX Coordinator is on notice that they are a Student or Employee with a Disability, even if the Party is registered to receive accommodations through SAS or UHR.

Brown University will address reasonable requests for support for the Parties and witnesses, including (1) language services and interpreters; (2) access and training regarding the use of technology throughout the resolution process and (3) other support as deemed reasonable and necessary to facilitate participation in the resolution process.

3.0 Definitions

Defined terms used and not otherwise defined in this Grievance Procedure are defined in the Sexual Misconduct Policy.

4.0 Responsibilities

All individuals to whom this Grievance Procedure applies are responsible for becoming familiar with and following it. University supervisors are responsible for promoting the understanding of this Grievance Procedure and for taking appropriate steps to help ensure compliance.

Division of Campus Life: Oversees the response to reports, submission of a Complaint, and the implementation of the Grievance Procedure.

The University's response is coordinated by the following individuals:

- **Title IX Coordinator:** The Title IX Coordinator oversees the review of Reports and Complaints associated with Prohibited Conduct. The Title IX Coordinator also oversees the implementation of Supportive Measures, the Informal Resolution Process, and the Formal Resolution Process.
- **The Institutional Equity Officers and Institutional Equity Investigator:** Serve as internal neutral fact finders.
- **The Associate Vice President for Institutional Equity, Accessibility, and Compliance:** Hears appeals of Complaint dismissal decisions.

5.0 Related Information

The following information compliments and supplements this document. The information is intended to help explain this Grievance Procedure and is not an all-inclusive list of policies, procedures, laws, and requirements.

5.1 Related University Policies:

- [Sexual Misconduct Policy](#)
- [Corporation Policy Statement on Equal Opportunity and Nondiscrimination](#)

- [Nondiscrimination and Anti-Harassment Policy](#)
- [Conflict of Interest and Commitment Policy](#)
- [Brown University Code of Student Conduct](#)
- [Pregnancy and Parenting Policy](#)
- [University Code of Conduct](#)
- [Non-Retaliation Policy](#)
- [Title IX Policy](#)

5.2 Related SOPs:

- [Student Conduct Procedures](#)
- [Discrimination and Harassment Standard Operating Procedure for Addressing and Responding to Reports and Complaints](#)
- [Title IX Grievance Procedure](#)

5.3 Related Forms: N/A

5.4 Frequently Asked Questions: N/A

5.5 Other Related Information: N/A

6.0 SOP Owner and Contact

6.1 SOP Owner: Vice President for Campus Life and Student Services

6.2 SOP Approved by: Vice President for Campus Life and Student Services

6.3 Contact Information: Title IX Coordinator

- titleixoffice@brown.edu
- 401-863-2026

7.0 SOP History

7.1 SOP Issue Date: August 14, 2020

7.2 SOP Effective Date: February 19, 2025

7.3 SOP Update/Review Summary: N/A

2025 Annual Fire Safety Report



In accordance with the Higher Education Opportunity Act, as amended in August 2008, Brown University, through this publication, is making available information regarding fire safety policies and procedures at Brown University, as well as fire statistics.

To view crime statistics, please refer to the Public Safety website: dps.brown.edu

In accordance with the Clery Act, Brown University is providing fire statistics for fires occurring inside residential housing for the last three years. Information concerning fire incidents in student housing facilities within the past 60 days is available in the Clery log or by sending an email request to fire_safety@brown.edu.

FIRE SAFETY IN STUDENT HOUSING

All residence halls (dormitories) and program houses (fraternities/sororities, etc.) have full coverage sprinkler systems. In addition, each has a supervised fire alarm system that will automatically notify the Providence Fire Department and Brown Public Safety upon activation. Within the individual living units, in addition to the sprinkler heads, there are smoke alarms that sound only in that unit (referred to as local alarms). The fire alarm notification appliances installed in each building include combination horn/strobes in all common areas and mini-horn sounders in each sleeping space. Fire alarm pull stations installed near stairways and at building exits are provided to allow manual activation of the fire alarm. Carbon monoxide detection is provided outside mechanical spaces and laundry areas, as required. Fire extinguishers are provided in all residence halls.

There are 23 other small apartment buildings (auxiliary housing) that have a variety of life safety systems as noted in spreadsheet at the end of this report.

Fire Drills and Student Evacuation Locations

Fire drills were conducted four times in 2024 in each residence hall and twice for all of the occupied apartment buildings.

The purpose of a fire drill is to raise fire safety awareness in the Brown community. Building occupants are trained in their responsibilities in the event of a fire alarm in their building. When the evacuation drill is conducted, the fire alarm is activated. Occupants evacuate the building proceeding to the assigned evacuation location as designated in the Emergency Action Plan (EAP) specific to each building. Students can access and print the EAP from the [Environmental Health and Safety website](#). The emergency egress plan for each residence hall is posted on the back of each residence hall door.

If a fire occurs in a residence hall, displaced students will be provided with alternative housing by the Office of Residential Life. Personnel from that office are on call 24 hours a day to ensure quick re-housing of displaced students.

Future Fire Safety Improvements

Public Safety and Emergency Management will promote fire safety education during the month of October to better educate students, staff and faculty and to showcase Fire Prevention Week for the entire month. Media will include safety messages on campus shuttles, in dining halls and at sporting events.

FIRE PREVENTION

The following is a list of prohibited items/practices in the residence halls:

- Paper, posters and wall hangings are prohibited in hallways and stairways. Glass-covered bulletin boards are provided for this purpose.
- Flammable liquids such as lighter fluid or gasoline are prohibited in all residence halls.
- The use of any extension cord without a built-in surge protector, such as U/L listed 15-amp power strip equipped with a circuit breaker, is prohibited.
- Halogen lamps are prohibited in all Residence Halls.
- Candles and all open flames are strictly prohibited. There is a \$100 fine per candle if discovered.
- The use of incense is prohibited.

- The following portable electrical devices are prohibited in Residence Halls: toasters, toaster ovens, grills, rice cookers and any other cooking device with an open element or open flame, unless stored/used in the building kitchen area(s).
- Space heaters and hot plates are prohibited in all areas.
- Gas grills with propane tanks are not allowed inside any residence halls.
- Smoking is prohibited in all residence halls. This is consistent with university policy and Rhode Island state law.
- Tapestries and canopies cannot be larger than 40 x 40 inches and must be at least 12 inches from an electrical outlet. Tapestries cannot cover sprinkler heads, smoke detectors or lights.

EDUCATION AND TRAINING

Information and Education

Brown provides fire and life safety information on the [Public Safety and Emergency Management website](#). Fire Safety personnel attend the annual campus resource fair during Orientation where they provide written fire safety information and speak with students and parents. In conjunction with Public Safety personnel and other departments, Fire Safety personnel participate in the Safety Fair for all students held within the first 45 days after Orientation. In addition, Fire Safety personnel take any opportunity offered to reach out and to encourage students to be knowledgeable about fire safety procedures and practices.

Fire Safety staff offer the following training programs to inform and train students, faculty and staff on risk-reduction strategies.

Emergency Action Plan Training

Staff, including residential peer leaders, area coordinators and summer residential directors, are required to take this training, which consists of a single 30- to 45-minute session presented by Fire Safety staff. This training is tailored to the audience and focuses on topics related to emergencies both inside and outside of buildings.

The topics include:

- Emergency evacuation procedures
- Reporting emergencies
- Emergency evacuation locations
- Personnel accountability
- Fire prevention awareness
- Fire extinguishers and their use
- Emergency medical procedures
- Shelter-in-place procedures
- Hostile intruder procedures
- Emergency communications
- Building-specific information

An online version of this training is also available for the entire Brown community.

Hands-On Fire Extinguishing Training

Using the Bullex® digital, live fire training simulator, Fire Safety staff present hands-on fire extinguisher training. This training is offered to faculty, staff and students. After a short lecture on the proper use of fire extinguishers, trainees extinguish a simulated fire with a laser-activated extinguisher. This training was offered twice in 2024 for students and additional times for specific buildings.

REPORTING A FIRE

Policy on Discovering a Fire

All Brown employees and students are to adhere to the following policy upon the discovery of a fire:

1. Close door, if possible.
2. Activate the nearest fire alarm pull station to alert and evacuate building occupants. Proceed out of the building to the building's evacuation location using stairwells, not elevators.
3. Call the Brown Public Safety emergency line by cell phone (401-863-4111) or use one of the strategically placed emergency phones (pedestal phone with a blue light above) to report location of fire directly to Public Safety.

Policy upon discovery of a fire that self-extinguished

All Brown faculty, staff and students should immediately call Public Safety (401-863-4111) when they discover a fire that has self-extinguished. The responding officer will take a report and notify the Fire Safety Officer on call.

AUTHORITY AND JURISDICTION

The Brown Fire Safety staff is not certified by the State of Rhode Island Fire Marshal's Office to enforce the Rhode Island Fire Code. This is in accordance with state policy. The Providence Fire Department Fire Prevention Bureau has the responsibility for inspecting all property within the City of Providence, including Brown-owned buildings. The Brown Fire Safety staff has extensive knowledge of fire safety regulations. They conduct monthly inspections of all Residence halls on campus, annual inspections of all Brown-owned auxiliary housing, and annual inspections of other University-owned. Fire Safety personnel, as well as a qualified third-party fire protection engineering firm, also review construction plans to ensure compliance with all applicable life and fire safety codes and ordinances. Fire Safety personnel work in tandem with Providence Fire Department inspectors, insurance providers and other outside agencies when they are on campus inspecting buildings. Students are subject to discipline and fines for violations of fire safety rules through Brown's Code of Student Conduct system.

Brown University Fire Safety personnel are on duty during the usual five-day administrative work schedule. A Fire Safety officer is on call 24 hours a day, seven days a week. The Fire Safety staff includes two full-time members who have extensive backgrounds in the fire service. They are assisted by three part-time members who handle specialized tasks, including inspections. The Fire Safety staff is part of the Office of Environmental Health and Safety.

The Fire Safety staff can be contacted by phone at (401) 863-3462 and by email at fire_safety@brown.edu. The Public Safety and Emergency Management, Communication Control Center, handles emergency dispatching for all campus emergencies. The emergency phone number is (401) 863-4111.

EVENT SAFETY

Public Safety and Emergency Management has developed an event safety program and checklist that both students and staff are required to follow for any gatherings of 50 or more persons on campus. The purpose of this program is to define policies and procedures that will ensure compliance with Rhode Island Uniform Fire Code requirements and enhance fire safety for events that occur inside Brown University buildings. The individual sponsor, or a representative of the sponsoring organization, must review this policy prior to the event and assure compliance with the specified procedures before and during the event. The procedures require familiarity with the University's Emergency Action Plan and use of the Event Safety Program Checklist. These two documents assist in the planning of the event, describe the use of safe decorations, detail the required steps that must be taken to ensure building safety prior to the start of the event and actions list that will help to prevent overcrowding and other unsafe conditions during the event. The use of pyrotechnic devices is prohibited. Fire Safety staff arrange with the Rhode Island Fire Marshal's Office to provide state-certified crowd manager training each academic year at Brown University.

Additional information can be found on the Fire Safety section of the [Public Safety and Emergency Management website](#).

FIRE PROTECTION IN BROWN STUDENT HOUSING FACILITIES (2024)

Building Name	Address	Sprinkler Protection	Fire Alarm Protection	Connected to Fire Dept	Connected to Brown Public Safety	Smoke Alarms in Sleeping Areas	Fire Extinguishers	Fire Drills
ANDREWS HALL	211 BOWEN ST.	full	full	yes	yes	yes	yes	4
ARCHIBALD-BRONSON	17 BENEVOLENT ST.	full	full	yes	yes	yes	yes	4
BARBOUR HALL	100 CHARLESFIELD ST.	full	full	yes	yes	yes	yes	4
BOWEN STREET 219	219 BOWEN ST.	full	full	yes	yes	yes	yes	4
BROWN STREET 111	111 BROWN ST.	full	full	yes	yes	yes	yes	4
BUXTON HOUSE	27 BROWN ST.	full	full	yes	yes	yes	yes	4
CASWELL HALL	168 THAYER ST.	full	full	yes	yes	yes	yes	4
CHAMPLIN HALL	208 MEETING ST.	full	full	yes	yes	yes	yes	4
CHAPIN HOUSE	116 THAYER ST.	full	full	yes	yes	yes	yes	4
CHEN FAMILY HALL	250 BROOK ST.	full	full	yes	yes	yes	yes	4
DANOFF HALL	257 BROOK ST.	full	full	yes	yes	yes	yes	4
DIMAN HOUSE	41 CHARLESFIELD ST.	full	full	yes	yes	yes	yes	4
EMERY HALL	200 MEETING ST.	full	full	yes	yes	yes	yes	4
EVERETT-POLAND	13 BENEVOLENT ST.	full	full	yes	yes	yes	yes	4
GODDARD HOUSE	39 CHARLESFIELD ST.	full	full	yes	yes	yes	yes	4
GRAD CENTER A	40 CHARLESFIELD ST.	full	full	yes	yes	yes	yes	4
GRAD CENTER B	44 CHARLESFIELD ST.	full	full	yes	yes	yes	yes	4
GRAD CENTER C	82 THAYER ST.	full	full	yes	yes	yes	yes	4
GRAD CENTER D	90 THAYER ST.	full	full	yes	yes	yes	yes	4
GREGORIAN QUAD A	103 THAYER ST.	full	full	yes	yes	yes	yes	4
GREGORIAN QUAD B	101 THAYER ST.	full	full	yes	yes	yes	yes	4
HARKNESS HOUSE	47 CHARLESFIELD ST.	full	full	yes	yes	yes	yes	4
HEGEMAN HALL	128 GEORGE ST.	full	full	yes	yes	yes	yes	4
HOPE COLLEGE	71 WATERMAN ST.	full	full	yes	yes	yes	yes	4
JAMESON-MEAD	11 BENEVOLENT ST.	full	full	yes	yes	yes	yes	4
KING HOUSE	154 HOPE ST.	full	full	yes	yes	yes	yes	4

RESIDENTIAL HOUSING 2024, continued

Building Name	Address	Sprinkler Protection	Fire Alarm Protection	Connected to Fire Dept	Connected to Brown Public Safety	Smoke Alarms in Sleeping Areas	Fire Extinguishers	Fire Drills
LITTLEFIELD HALL	102 GEORGE ST.	full	full	yes	yes	yes	yes	4
MACHADO HOUSE	87 PROSPECT ST.	full	full	yes	yes	yes	yes	4
MARCY HOUSE	115 GEORGE ST.	full	full	yes	yes	yes	yes	4
METCALF HALL	98 CUSHING ST.	full	full	yes	yes	yes	yes	4
MILLER HALL	118 CUSHING ST.	full	full	yes	yes	yes	yes	4
MINDEN HALL	121 WATERMAN ST.	full	full	yes	yes	yes	yes	4
MORRISS HALL	206 MEETING ST.	full	full	yes	yes	yes	yes	4
NEW PEMBROKE 1	302 THAYER ST.	full	full	yes	yes	yes	yes	4
NEW PEMBROKE 2	306 THAYER ST.	full	full	yes	yes	yes	yes	4
NEW PEMBROKE 3	308 THAYER ST.	full	full	yes	yes	yes	yes	4
NEW PEMBROKE 4	300 THAYER ST.	full	full	yes	yes	yes	yes	4
OLNEY HOUSE	29 BROWN ST.	full	full	yes	yes	yes	yes	4
PERKINS HALL	154 POWER ST.	full	full	yes	yes	yes	yes	4
SEARS HOUSE	113 GEORGE ST.	full	full	yes	yes	yes	yes	4
SLATER HALL	70 GEORGE ST.	full	full	yes	yes	yes	yes	4
STERNLICHT COMMONS	450 BROOK ST.	full	full	yes	yes	yes	yes	4
THAYER 315	315 THAYER	full	full	yes	yes	yes	yes	4
WAYLAND HOUSE	31 BROWN ST.	full	full	yes	yes	yes	yes	4
WEST HOUSE	91 BROWN ST.	full	full	yes	yes	yes	yes	4
WOOLLEY HALL	202 MEETING ST.	full	full	yes	yes	yes	yes	4
YOUNG ORCHARD 2	2 YOUNG ORCHARD AVE	full	full	yes	yes	yes	yes	4
YOUNG ORCHARD 4	4 YOUNG ORCHARD AVE	full	full	yes	yes	yes	yes	4
YOUNG ORCHARD 10	10 YOUNG ORCHARD AVE	full	full	yes	yes	yes	yes	4

BROWN UNIVERSITY FIRE PROTECTION IN APARTMENT BUILDINGS - AUXILIARY HOUSING 2024

Building Name	Address	Sprinkler Protection	Fire Alarm Protection	Connected to Fire Dept	Connected to Brown Public Safety	Smoke Alarms in Sleeping Areas	Fire Extinguishers	Fire Drills
ANGELL ST 127	127 ANGELL ST	no	full	yes	yes	yes	yes	2
ANGELL ST 129	129 ANGELL ST	no	full	yes	yes	yes	yes	2
ANGELL ST 165	165 ANGELL ST	full	full	yes	yes	yes	yes	2
BENEVOLENT ST 074-080	074-080 BENEVOLENT ST	no	full	no	yes	yes	yes	2
BENEVOLENT ST 084	084 BENEVOLENT ST	no	full	no	yes	yes	yes	2
BENEVOLENT ST 086	086 BENEVOLENT ST	no	full	no	yes	yes	yes	2
BOWEN ST 247	247 BOWEN ST	no	full	yes	yes	yes	yes	2
BROOK ST 281-283	281-283 BROOK ST	no	no	no	no	yes	yes	2
BROOK ST 456	456 BROOK ST	no	no	no	no	yes	yes	2
CHARLESFIELD ST 071-073	071-073 CHARLESFIELD ST	full	full	yes	yes	yes	yes	2
CUSHING ST 154	154 CUSHING ST	no	no	no	no	yes	yes	2
CUSHING ST 166	166 CUSHING ST	no	no	no	no	yes	yes	2
HOPE ST 200	200 HOPE ST	no	full	yes	yes	yes	yes	2
OLIVE ST 020	020 OLIVE ST	no	full	no	yes	yes	yes	2
WATERMAN ST 086	086 WATERMAN ST	no	full	yes	yes	yes	yes	2
WATERMAN ST 125-127	WATERMAN ST 125-127	full	full	yes	yes	yes	yes	2
WATERMAN ST 129	129 WATERMAN ST	full	full	yes	yes	yes	yes	2

FIRE INCIDENTS IN BROWN UNIVERSITY STUDENT HOUSING FACILITIES, 2024

Building Name	Address	Date and Time of Fire	Date Reported	Nature of Fire	Location of Fire	Injuries Requiring Treatment	Fire-Related Death	Property Value
ANDREWS HALL	211 BOWEN ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
ANGELL127	127 ANGELL ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
ANGELL129	129 ANGELL ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
ANGELL ST 165	165 ANGELL ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
BRONSON	17 BENEVOLENT ST	3/17/24 8:27 a.m.	3/17/24	Intentional	Dorm Room	1	N/A	\$0
BARBOUR HALL	100 CHARLESFIELD ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
BENE074-80	74-80 BENEVOLENT ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
BENE084	84 BENEVOLENT ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
BENE086	86 BENEVOLENT ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
STERNLICHT COMMONS	450 BROOK ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
BOWEN STREET 219	219 BOWEN STREET	N/A	N/A	N/A	N/A	N/A	N/A	N/A
BOWEN247	247 BOWEN ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
BROOK281-3	281-283 BROOK ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
BROOK456	456 BROOK ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
BROWN ST111	111 BROWN ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
BUXTON HOUSE	27 BROWN ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
CASWELL HALL	168 THAYER ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
CHAMPLIN HALL	208 MEETING ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
CHAPIN HOUSE	116 THAYER ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
CHAR071-73	71-73 CHARLESFIELD ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
CHEN FAMILY HALL	250 BROOK ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
CUSH084-86	84-86 CUSHING ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
CUSH154	154 CUSHING ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A

Fire Incidents In Brown University Student Housing Facilities, 2024, continued

Building Name	Address	Date and Time of Fire	Date Reported	Nature of Fire	Location of Fire	Injuries Requiring Treatment	Fire-Related Death	Property Value
CUSH166	166 CUSHING ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
DANOFF HALL	259 BROOK ST	N/A	N/A	N/A	N/A	N/A	N/A	\$0
DIMAN HOUSE	41 CHARLESFIELD ST	2/15/24 11:53 p.m.	2/15/2024	Intentional	First-floor dorm room	1	N/A	N/A
DIMAN HOUSE	41 CHARLESFIELD ST	5/10/24 2:44 p.m.	5/10/2024	Undetermined/ trash can	Trash room	N/A	N/A	\$100-999
DIMAN HOUSE	41 CHARLESFIELD ST	5/11/24 4:34 p.m.	5/11/2024	Undetermined/ trash can/ suspicious	Trash room	N/A	N/A	\$0-99
EMERY HALL	200 MEETING ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
EVERETT POLAND	13 BENEVOLENT ST	4/13/24 9:52 p.m.	4/13/2024	Intentional	Men's restroom	N/A	N/A	\$0-99
GODDARD HOUSE	39 CHARLESFIELD ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
GRAD CENTER A	40 CHARLESFIELD ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
GRAD CENTER B	44 CHARLESFIELD ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
GRAD CENTER C	82 THAYER ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
GRAD CENTER D	90 THAYER ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
GREGORIAN QUAD A	103 THAYER ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
GREGORIAN QUAD B	101 THAYER ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
HARKNESS HOUSE	47 CHARLESFIELD ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
HEGEMAN A	128 GEORGE ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
HEGEMAN B	128 GEORGE ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
HEGEMAN C	128 GEORGE ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
HEGEMAN D	128 GEORGE ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
HEGEMAN E	128 GEORGE ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
HOPE COLLEGE	71 WATERMAN ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
HOPE ST 200	200 HOPE ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
JAMESON MEAD	11 BENEVOLENT ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
KING HOUSE	154 HOPE ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
LITTLEFIELD HALL	102 GEORGE ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
MACHADO HOUSE	87 PROSPECT ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A

Fire Incidents In Brown University Student Housing Facilities, 2024, continued

Building Name	Address	Date and Time of Fire	Date Reported	Nature of Fire	Location of Fire	Injuries Requiring Treatment	Fire-Related Death	Property Value
MARCY HOUSE	115 GEORGE ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
METCALF HALL	98 CUSHING ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
MILLER HALL	118 CUSHING ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
THAYER STREET 302	302 THAYER ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
MINDEN HALL	121 WATERMAN ST	2/25/24 6:22 p.m.	2/25/2024	Unintentional/ space heater	Third-floor dorm room	N/A	N/A	\$ 0-99
MORRISS HALL	206 MEETING ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
NEW PEMBROKE 1	302 THAYER ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
NEW PEMBROKE 2	306 THAYER ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
NEW PEMBROKE 3	308 THAYER ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
NEW PEMBROKE 4	300 THAYER ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
OLIVEo20	20 OLIVE ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
OLNEY HOUSE	29 BROWN ST	3/23/24 8:23 a.m.	3/23/2024	Undetermined/ suspicious	Restroom trash can	N/A	N/A	\$0-99
PERKINS HALL	154 POWER ST	10/5/24 3:22 p.m.	10/5/2024	Accidental	Napkin on top of stove	N/A	N/A	\$0
SEARS HOUSE	113 GEORGE ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
SLATER HALL	70 GEORGE ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
THAYER 315	315 THAYER	N/A	N/A	N/A	N/A	N/A	N/A	N/A
WATERo86	86 WATERMAN ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
WATER125-7	125-127 WATERMAN ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
WATER129	129 WATERMAN ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
WAYLAND HOUSE	31 BROWN ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
WEST HOUSE	91 BROWN ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
WOOLLEY HALL	202 MEETING ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
YOUNG ORCHARD 2	2 YOUNG ORCHARD AVE	N/A	N/A	N/A	N/A	N/A	N/A	N/A
YOUNG ORCHARD 4	4 YOUNG ORCHARD AVE	N/A	N/A	N/A	N/A	N/A	N/A	N/A
YOUNG ORCHARD 10	10 YOUNG ORCHARD AVE	4/25/24 9:26 a.m.	4/25/2024	Stovetop/ accidental	Second-floor kitchen	N/A	N/A	\$1,000-9,999

FIRE INCIDENTS IN BROWN UNIVERSITY STUDENT HOUSING FACILITIES, 2023

Building Name	Address	Date and Time of Fire	Date Reported	Nature of Fire	Location of Fire	Injuries Requiring Treatment	Fire Related Death	Property Value
ANDREWS HALL	211 BOWEN ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
ANGELL127	ANGELL ST 127	N/A	N/A	N/A	N/A	N/A	N/A	N/A
ANGELL129	ANGELL ST 129	N/A	N/A	N/A	N/A	N/A	N/A	N/A
ANGELL ST 165	165 ANGELL ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
ARCHIBALD BRONSON	17 BENEVOLENT ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
BARBOUR HALL	100 CHARLESFIELD ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
BENE074-80	BENEVOLENT ST 074-080	N/A	N/A	N/A	N/A	N/A	N/A	N/A
BENE084	BENEVOLENT ST 084	N/A	N/A	N/A	N/A	N/A	N/A	N/A
BENE086	BENEVOLENT ST 086	N/A	N/A	N/A	N/A	N/A	N/A	N/A
STERNLICHT COMMONS	450 BROOK ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
BOWEN STREET 219	219 BOWEN STREET	N/A	N/A	N/A	N/A	N/A	N/A	N/A
BOWEN247	BOWEN ST 247	N/A	N/A	N/A	N/A	N/A	N/A	N/A
BOWEN251	BOWEN ST 251	N/A	N/A	N/A	N/A	N/A	N/A	N/A
BROOK281-3	BROOK ST 281-283	N/A	N/A	N/A	N/A	N/A	N/A	N/A
BROOK456	BROOK ST 456	N/A	N/A	N/A	N/A	N/A	N/A	N/A
BROWN ST 111	111 BROWN STREET	11/21/23 6:17 p.m.	11/21/23	Stovetop fire	First-floor kitchen	0	0	\$0-99
BUXTON HOUSE	27 BROWN ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
CASWELL HALL	168 THAYER ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
CHAMPLIN HALL	208 MEETING ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
CHAPIN HOUSE	116 THAYER ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
CHAR071-73	CHARLESFIELD ST 071-073	N/A	N/A	N/A	N/A	N/A	N/A	N/A
CHEN FAMILY HALL	250 BROOK STREET	N/A	N/A	N/A	N/A	N/A	N/A	N/A
CUSH084-86	CUSHING ST 084-086	N/A	N/A	N/A	N/A	N/A	N/A	N/A
CUSH154	CUSHING ST 154	N/A	N/A	N/A	N/A	N/A	N/A	N/A

FIRE INCIDENTS IN BROWN UNIVERSITY STUDENT HOUSING FACILITIES, 2023, continued

Building Name	Address	Date and Time of Fire	Date Reported	Nature of Fire	Location of Fire	Injuries Requiring Treatment	Fire Related Death	Property Value
CUSH166	CUSHING ST 166	N/A	N/A	N/A	N/A	N/A	N/A	N/A
DANOFF HALL	259 BROOK ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
DIMAN HOUSE	41 CHARLESFIELD ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
EMERY HALL	200 MEETING ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
EVERETT POLAND	13 BENEVOLENT ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
GODDARD HOUSE	39 CHARLESFIELD ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
GRAD CENTER A	40 CHARLESFIELD ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
GRAD CENTER B	44 CHARLESFIELD ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
GRAD CENTER C	82 THAYER ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
GRAD CENTER D	90 THAYER ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
GREGORIAN QUAD A	103 THAYER ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
GREGORIAN QUAD B	101 THAYER ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
HARKNESS HOUSE	47 CHARLESFIELD ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
HEGEMAN A	128 GEORGE ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
HEGEMAN B	128 GEORGE ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
HEGEMAN C	128 GEORGE ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
HEGEMAN D	128 GEORGE ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
HEGEMAN E	128 GEORGE ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
HOPE COLLEGE	71 WATERMAN ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
HOPE ST 200	200 HOPE ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
JAMESON MEAD	11 BENEVOLENT ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
KING HOUSE	154 HOPE ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
LITTLEFIELD HALL	102 GEORGE ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
MACHADO HOUSE	87 PROSPECT ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
MARCY HOUSE	115 GEORGE ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
METCALF HALL	98 CUSHING ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A

FIRE INCIDENTS IN BROWN UNIVERSITY STUDENT HOUSING FACILITIES, 2023, continued

Building Name	Address	Date and Time of Fire	Date Reported	Nature of Fire	Location of Fire	Injuries Requiring Treatment	Fire Related Death	Property Value
MILLER HALL	118 CUSHING ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
MINDEN HALL	121 WATERMAN ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
MORRIS HALL	206 MEETING ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
NEW PEMBROKE 1	302 THAYER ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
NEW PEMBROKE 2	306 THAYER ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
NEW PEMBROKE 3	308 THAYER ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
NEW PEMBROKE 4	300 THAYER ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
OLIVE 020	OLIVE ST 020	N/A	N/A	N/A	N/A	N/A	N/A	N/A
OLNEY HOUSE	29 BROWN ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
PERKINS HALL	154 POWER ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
SEARS HOUSE	113 GEORGE ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
SLATER HALL	70 GEORGE ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
THAYER 315	315 THAYER	N/A	N/A	N/A	N/A	N/A	N/A	N/A
WATER 086	WATERMAN ST 086	N/A	N/A	N/A	N/A	N/A	N/A	N/A
WATER 125-7	WATERMAN ST 125-127	N/A	N/A	N/A	N/A	N/A	N/A	N/A
WATER 129	WATERMAN ST 129	N/A	N/A	N/A	N/A	N/A	N/A	N/A
WAYLAND HOUSE	31 BROWN ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
WEST HOUSE	91 BROWN ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
WOOLLEY HALL	202 MEETING ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
YOUNG ORCHARD 2	2 YOUNG ORCHARD AVE	N/A	N/A	N/A	N/A	N/A	N/A	N/A
YOUNG ORCHARD 4	4 YOUNG ORCHARD AVE	5/9/23 4:42 p.m.	5/9/23	Cloth shoulder bag caught fire while cooking	Fourth-floor kitchen	0	0	\$0-99
YOUNG ORCHARD 10	10 YOUNG ORCHARD AVE	N/A	N/A	N/A	N/A	N/A	N/A	N/A

FIRE INCIDENTS IN BROWN UNIVERSITY STUDENT HOUSING FACILITIES, 2022

Building Name	Address	Date and Time of Fire	Date Reported	Nature of Fire	Location of Fire	Injuries Requiring Treatment	Fire Related Death	Property Value
ANDREWS HALL	211 BOWEN ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
ANGELL127	ANGELL ST 127	N/A	N/A	N/A	N/A	N/A	N/A	N/A
ANGELL129	ANGELL ST 129	N/A	N/A	N/A	N/A	N/A	N/A	N/A
ANGELL ST 165	165 ANGELL ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
ARCHIBALD BRONSON	17 BENEVOLENT ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
BARBOUR HALL	100 CHARLESFIELD ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
BENE074-80	BENEVOLENT ST 074-080	N/A	N/A	N/A	N/A	N/A	N/A	N/A
BENE084	BENEVOLENT ST 084	N/A	N/A	N/A	N/A	N/A	N/A	N/A
BENE086	BENEVOLENT ST 086	N/A	N/A	N/A	N/A	N/A	N/A	N/A
STERNLICHT COMMONS	450 BROOK ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
BOWEN STREET 219	219 BOWEN STREET	N/A	N/A	N/A	N/A	N/A	N/A	N/A
BOWEN247	BOWEN ST 247	N/A	N/A	N/A	N/A	N/A	N/A	N/A
BOWEN251	BOWEN ST 251	N/A	N/A	N/A	N/A	N/A	N/A	N/A
BROOK245-7	BROOK ST 245-247	N/A	N/A	N/A	N/A	N/A	N/A	N/A
BROOK281-3	BROOK ST 281-283	N/A	N/A	N/A	N/A	N/A	N/A	N/A
BROOK456	BROOK ST 456	N/A	N/A	N/A	N/A	N/A	N/A	N/A
BROWN STREET 111	111 BROWN STREET	N/A	N/A	N/A	N/A	N/A	N/A	N/A
BUXTON HOUSE	27 BROWN ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
CASWELL HALL	168 THAYER ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
CHAMPLIN HALL	208 MEETING ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
CHAPIN HOUSE	116 THAYER ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
CHAR070-72	CHARLESFIELD ST 070-072	N/A	N/A	N/A	N/A	N/A	N/A	N/A
CHAR071-73	CHARLESFIELD ST 071-073	N/A	N/A	N/A	N/A	N/A	N/A	N/A
CUSH084-86	CUSHING ST 084-086	N/A	N/A	N/A	N/A	N/A	N/A	N/A
CUSH154	CUSHING ST 154	N/A	N/A	N/A	N/A	N/A	N/A	N/A

FIRE INCIDENTS IN BROWN UNIVERSITY STUDENT HOUSING FACILITIES, 2022, continued

Building Name	Address	Date and Time of Fire	Date Reported	Nature of Fire	Location of Fire	Injuries Requiring Treatment	Fire Related Death	Property Value
CUSH166	CUSHING ST 166	N/A	N/A	N/A	N/A	N/A	N/A	N/A
DIMAN HOUSE	41 CHARLESFIELD ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
EMERY HALL	200 MEETING ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
EVERETT POLAND	13 BENEVOLENT ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
GODDARD HOUSE	39 CHARLESFIELD ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
GRAD CENTER A	40 CHARLESFIELD ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
GRAD CENTER B	44 CHARLESFIELD ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
GRAD CENTER C	82 THAYER ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
GRAD CENTER D	90 THAYER ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
GREGORIAN QUAD A	103 THAYER ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
GREGORIAN QUAD B	101 THAYER ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
HARKNESS HOUSE	47 CHARLESFIELD ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
HEGEMAN A	128 GEORGE ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
HEGEMAN B	128 GEORGE ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
HEGEMAN C	128 GEORGE ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
HEGEMAN D	128 GEORGE ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
HEGEMAN E	128 GEORGE ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
HOPE COLLEGE	71 WATERMAN ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
HOPE ST 200	200 HOPE ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
JAMESON MEAD	11 BENEVOLENT ST	4/8/22 11:30 p.m.	Same	Stovetop	Kitchen/ lounge	0	0	\$0-99
KING HOUSE	154 HOPE ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
LITTLEFIELD HALL	102 GEORGE ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
LLOYD165-7	LLOYD AVE 165-167	N/A	N/A	N/A	N/A	N/A	N/A	N/A
MACHADO HOUSE	87 PROSPECT ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
MARCY HOUSE	115 GEORGE ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
METCALF HALL	98 CUSHING ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A

FIRE INCIDENTS IN BROWN UNIVERSITY STUDENT HOUSING FACILITIES, 2022, continued

Building Name	Address	Date and Time of Fire	Date Reported	Nature of Fire	Location of Fire	Injuries Requiring Treatment	Fire Related Death	Property Value
MILLER HALL	118 CUSHING ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
MINDEN HALL	121 WATERMAN ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
MORRIS HALL	206 MEETING ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
NEW PEMBROKE 1	302 THAYER ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
NEW PEMBROKE 2	306 THAYER ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
NEW PEMBROKE 3	308 THAYER ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
NEW PEMBROKE 4	300 THAYER ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
OLIVE 020	OLIVE ST 020	N/A	N/A	N/A	N/A	N/A	N/A	N/A
OLNEY HOUSE	29 BROWN ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
PERKINS HALL	154 POWER ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
SEARS HOUSE	113 GEORGE ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
SLATER HALL	70 GEORGE ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
THAYER 315	315 THAYER	N/A	N/A	N/A	N/A	N/A	N/A	N/A
WATER 086	WATERMAN ST 086	N/A	N/A	N/A	N/A	N/A	N/A	N/A
WATER 125-7	WATERMAN ST 125-127	N/A	N/A	N/A	N/A	N/A	N/A	N/A
WATER 129	WATERMAN ST 129	N/A	N/A	N/A	N/A	N/A	N/A	N/A
WAYLAND HOUSE	31 BROWN ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
WEST HOUSE	91 BROWN ST	N/A	N/A	N/A	N/A	N/A	N/A	N/A
WOOLLEY HALL	202 MEETING ST	3/11/22 9:57 p.m.	Same	Intentional paper fire	Second-floor corridor	0	0	\$0-99
YOUNG ORCHARD 2	2 YOUNG ORCHARD AVE	5/4/22 12:27 p.m.	Same	Stove top	First-floor	0	0	\$0-99
YOUNG ORCHARD 4	4 YOUNG ORCHARD AVE	N/A	N/A	N/A	N/A	N/A	N/A	N/A
YOUNG ORCHARD 10	10 YOUNG ORCHARD AVE	N/A	N/A	N/A	N/A	N/A	N/A	N/A

PUBLIC SAFETY AND EMERGENCY MANAGEMENT HEADQUARTERS
75 Charlesfield Street
Providence, Rhode Island 02912

Hours:
Monday - Friday, 8:30 a.m. – 5 p.m.
Summer Hours, 8 a.m. – 4 p.m.



BROWN