

Annual Report September 1, 2018-August 31, 2019

I. Introduction

Northwestern is committed to fostering an environment in which all members of our community are free from discrimination and harassment—including sexual misconduct. Such conduct violates the values of our institution and disrupts the living, learning, and working environment for students, faculty, staff, and other community members.

The University's Policy on [Discrimination and Harassment](#) prohibits discrimination and harassment on the basis of race, color, religion, national origin, sex, pregnancy, sexual orientation, gender identity, gender expression, parental status, marital status, age, disability, citizenship status, veteran status, genetic information, or any other classification protected by law in matters of admissions, employment, housing, or in the educational programs or activities it operates. Northwestern's [Policy on Sexual Misconduct](#) prohibits all forms of sexual misconduct, including sexual assault, sexual exploitation, stalking, dating and domestic violence, and sexual harassment.

The [Office of Equity](#) works to uphold the University's commitment by:

- Responding to reports of sexual misconduct, discrimination, and harassment, including by helping students, faculty, and staff understand the University's processes for making such reports;
- Providing support and resources to those impacted by sexual misconduct, discrimination, and harassment;
- Providing training, consultation, and resources to the University community regarding accommodating individuals with disabilities, the University's affirmative action programs for faculty and staff, and responding to reports of sexual misconduct, discrimination, and harassment; and
- Working with students, faculty, and staff to revise and implement policies related to sexual misconduct, discrimination, harassment, and providing reasonable accommodations to individuals with disabilities.

The Office of Equity's work primarily falls within four categories: complaint resolution, reasonable accommodations for employees with disabilities and pregnant community members, affirmative action planning, and training initiatives. In addition, representatives of the office provide proactive education and advisory services to community members who wish to better understand the University's non-discrimination policies or explore ways in which to support equal opportunity in their schools or units.

II. Complaint Resolution

The Office of Equity is responsible for responding to all reports of sexual misconduct, including sexual assault, sexual exploitation, stalking, dating and domestic violence, and sexual harassment. The Office of Equity is also responsible for responding to reports of discrimination and harassment

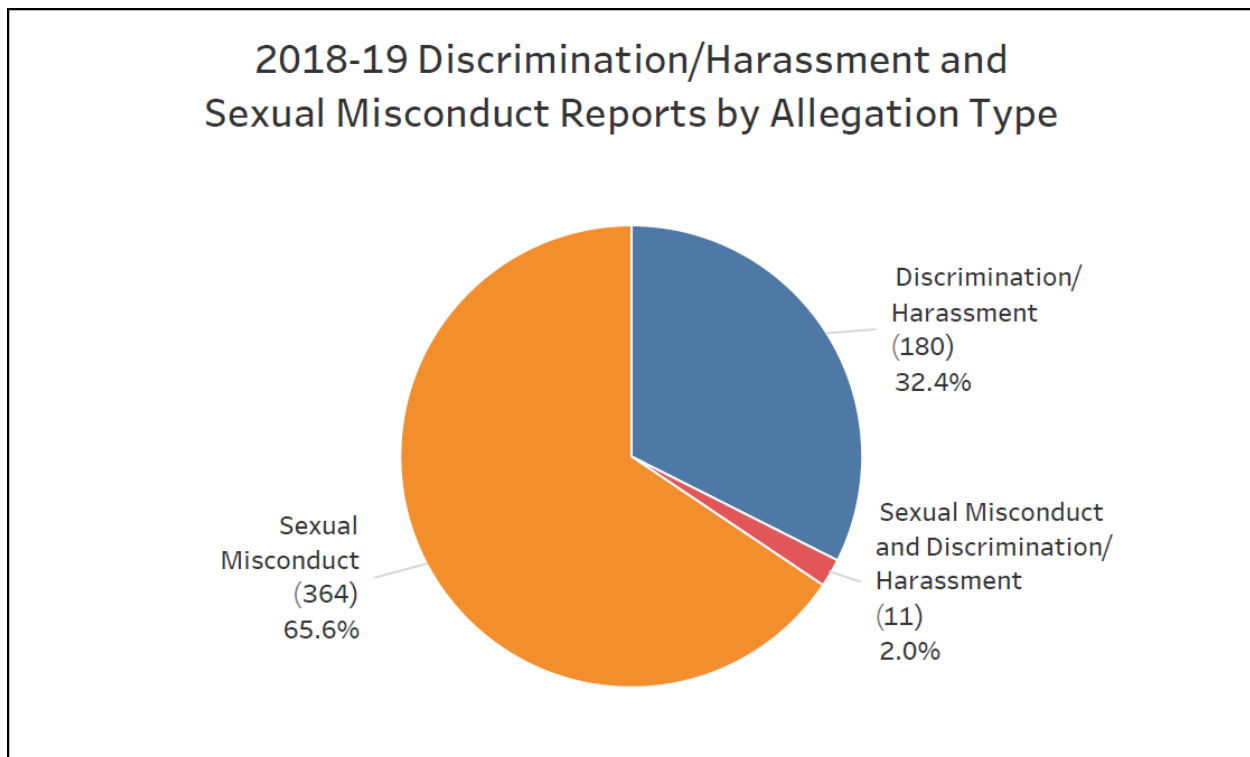
based on race, color, religion, national origin, sex, pregnancy, sexual orientation, gender identity, gender expression, parental status, marital status, age, disability, citizenship status, veteran status, or genetic information when those acts are alleged to have been committed by faculty, staff, or affiliated third parties. When a student is alleged to have engaged in discrimination or harassment, Northwestern’s Office of Student Conduct investigates the matter in accordance with the Student Code of Conduct.

When an incident of alleged sexual misconduct, discrimination or harassment is reported to the University, whether it is reported in person, by email, electronically, anonymously, or through another person, the Office of Equity outreaches to the potentially impacted person(s) to offer information and resources. One of the options available to a person who may have experienced such conduct is a University investigation and adjudication of whether a violation of the Policy on Sexual Misconduct or Policy on Discrimination and Harassment has occurred. Disciplinary action can be taken against those who are determined to have violated these policies. Northwestern’s complaint resolution process for these complaints can be found in Section III of the [Policy on Sexual Misconduct](#) and the Policy on [Discrimination and Harassment](#).

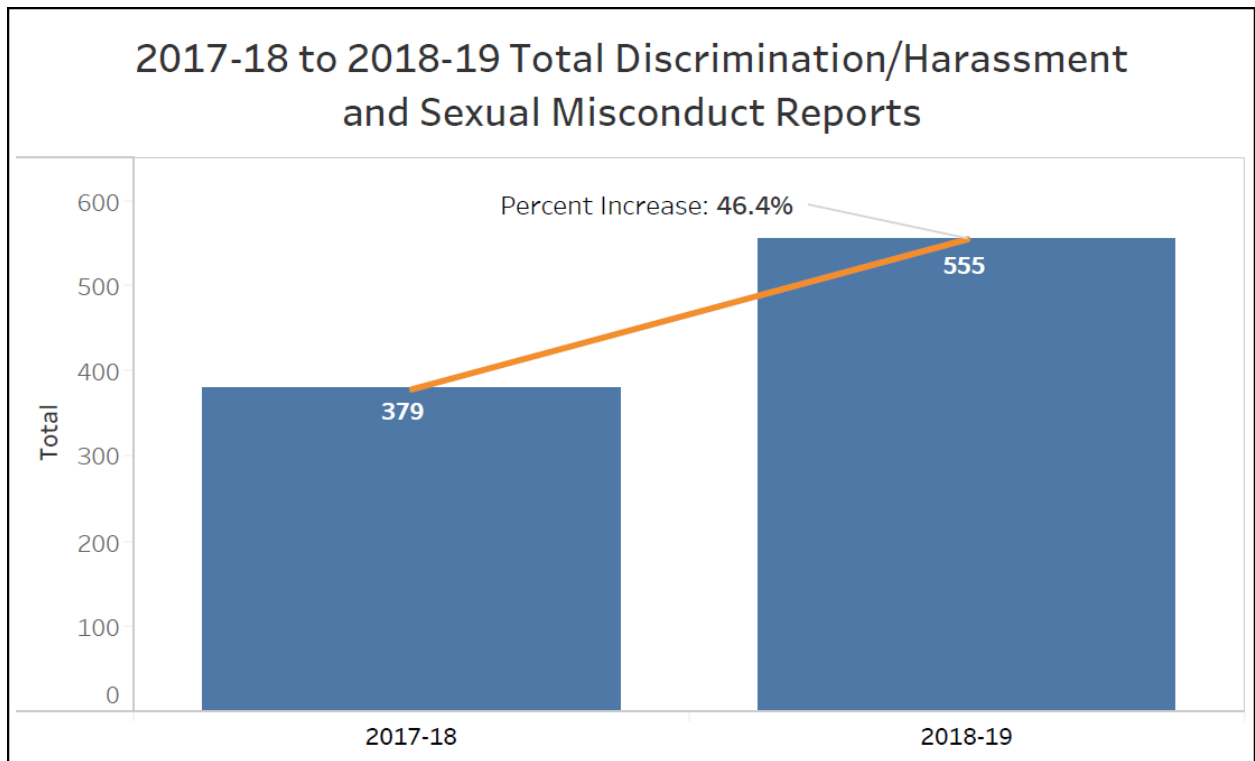
The following charts present data on the number of sexual misconduct, discrimination, and harassment reports received by the Office of Equity, the nature of those reports, and their dispositions during the academic year beginning September 1, 2018, and ending August 31, 2019.

A. Distribution of All Reports by Type of Allegation

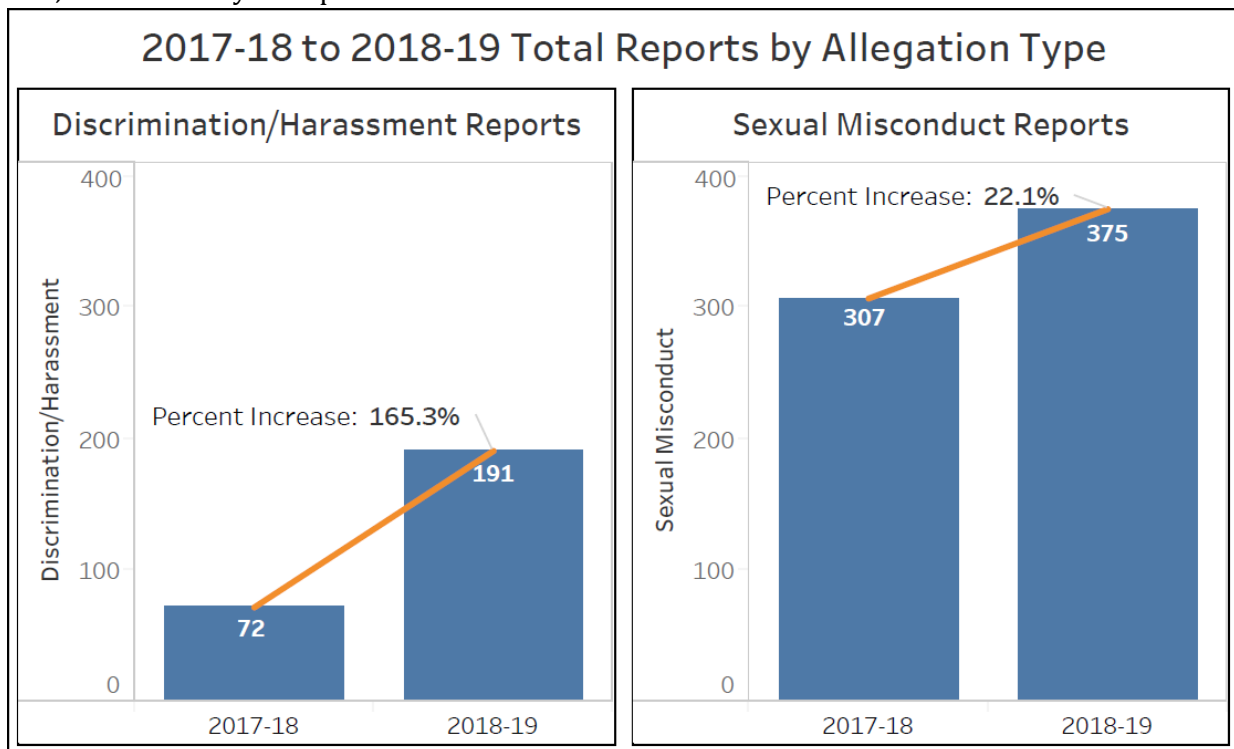
During the 2018-19 academic year, the Office of Equity received 555 reports. The following chart illustrates the distribution by type of allegation of the reports received by the Office of Equity.



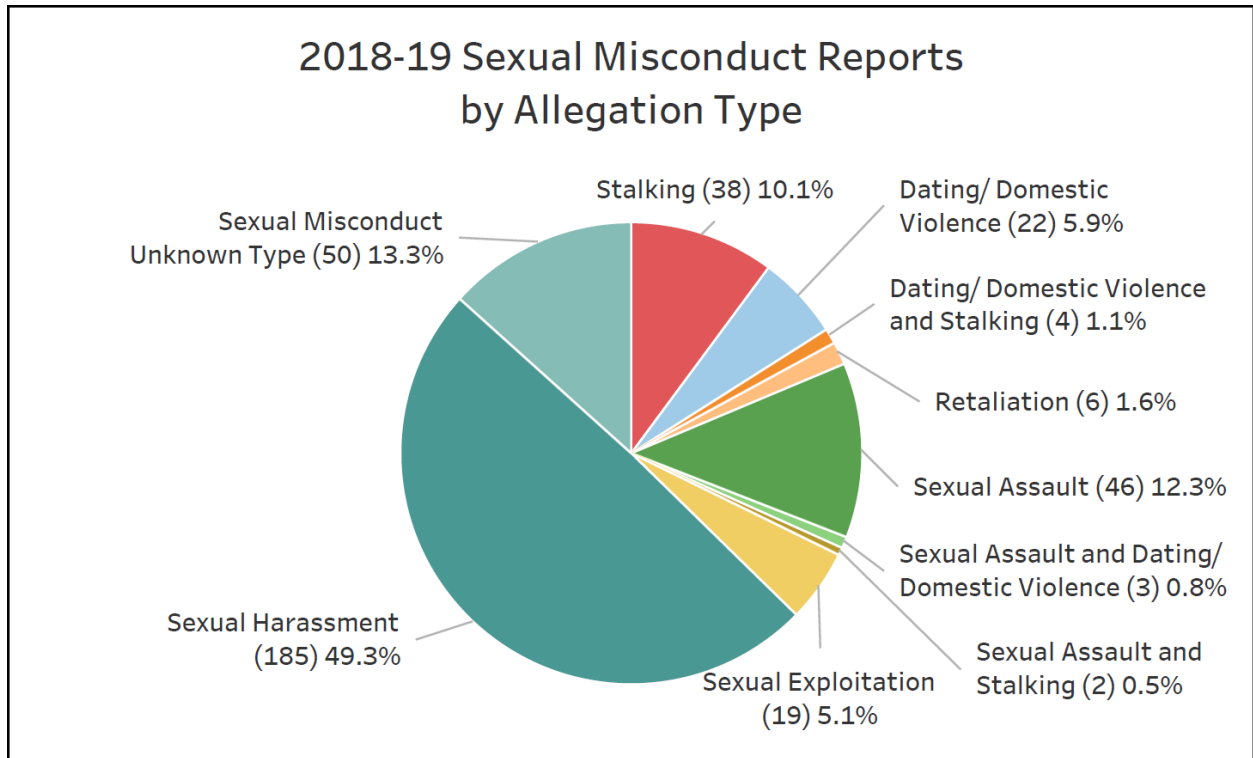
The Office of Equity saw an increase in reports from the 2017-18 to the 2018-19 academic year. The overall number of reports increased by 176, from 379 in 2017-18, to 555 in 2018-19.



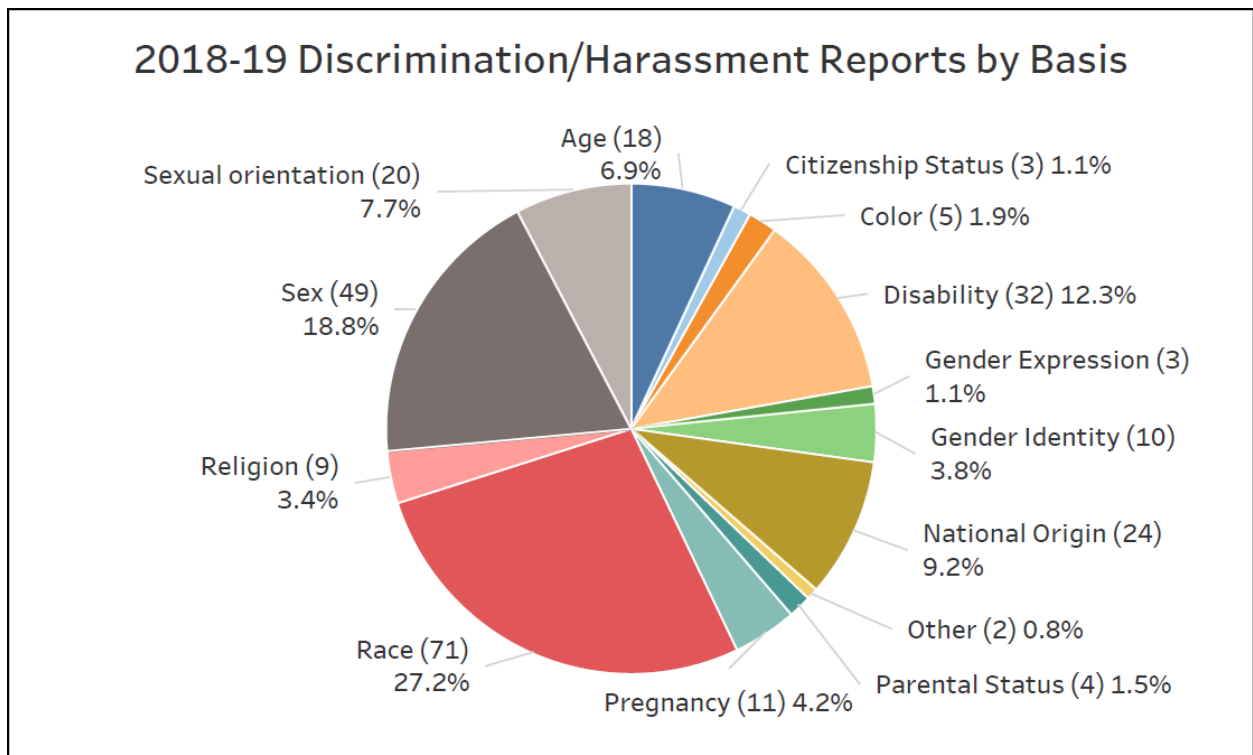
The number of discrimination and harassment reports increased by 119, from 72 in 2017-18, to 191 in 2018-19. The number of sexual misconduct reports also increased in 2018-19, from 307 to 375, an increase by 68 reports.



The following chart illustrates the type of sexual misconduct allegations received in 2018-19. Categories were added to reflect combined reports of sexual assault, dating or domestic violence, and stalking. When a report involved other combinations of sexual misconduct offenses (e.g. sexual assault and sexual harassment), it was categorized based on the primary allegation.

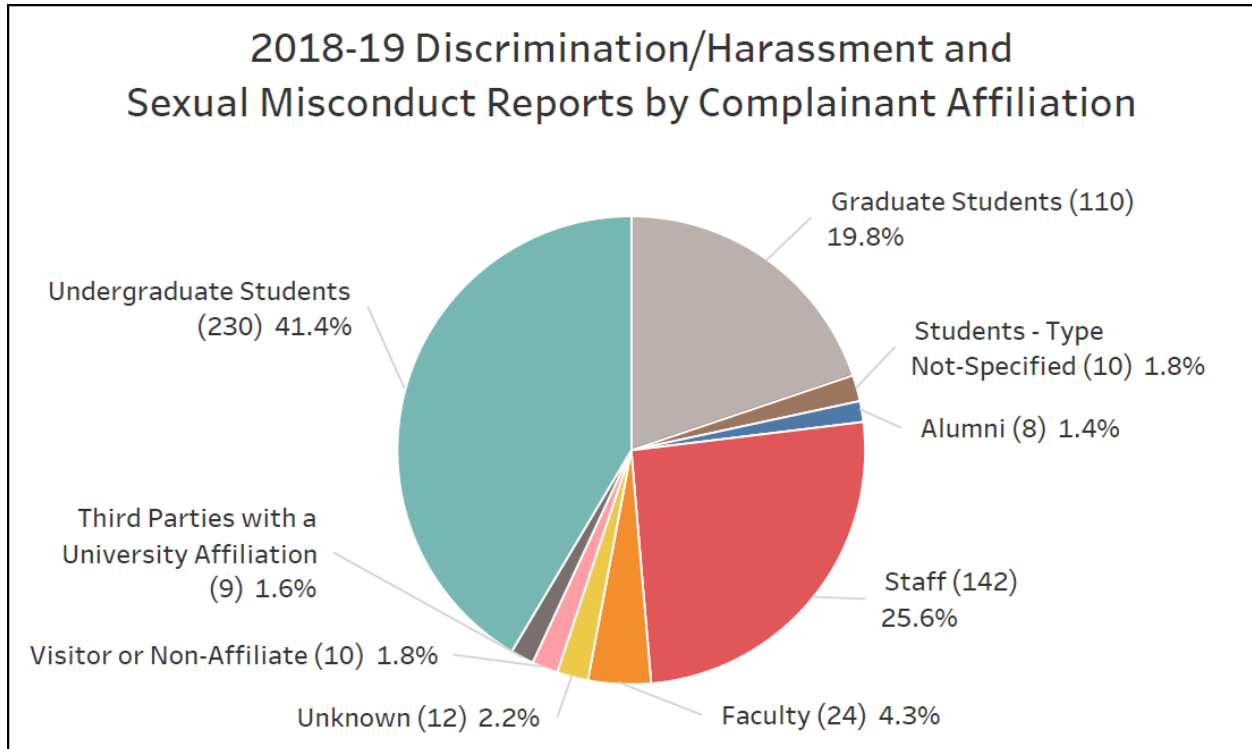


The following chart illustrates the bases for the 191 reports of discrimination and harassment. Note that each report could articulate one or more bases.



B. Distribution of Reports by Complainant Affiliation

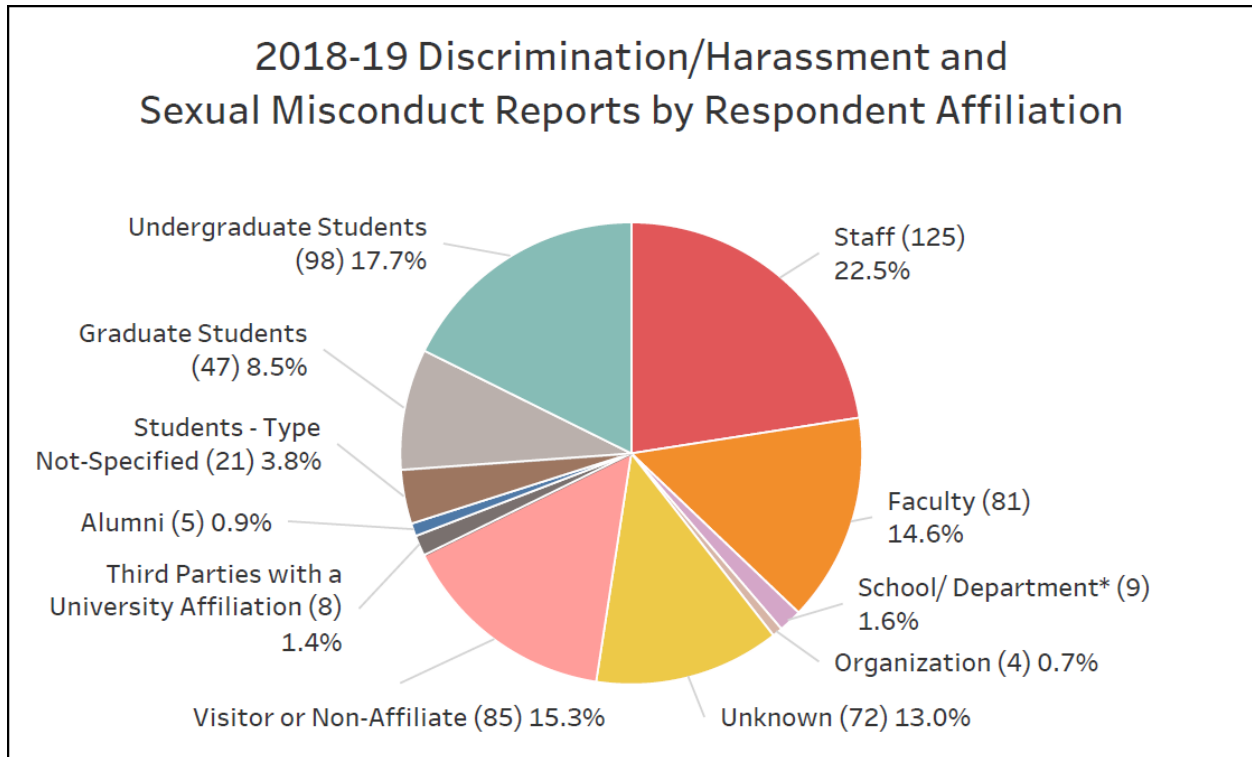
The following chart illustrates the complainant affiliation for each of the reports received by the Office of Equity during the 2018-19 academic year. The complainant is the person who is alleged to have been impacted by the reported conduct. Of the 555 reports, 22 complainants (4.0%) either held no affiliation with Northwestern, or remained unidentified.¹



¹ When Northwestern receives reports from individuals who are unknown or unaffiliated, the Office of Equity evaluates the report to discern whether the described conduct impacts Northwestern's working or learning environments and to determine the appropriate response. An appropriate response may, but does not necessarily, include a formal investigation. In all reports in which a complainant can be identified, Northwestern offers support and resources to the impacted individual(s). In reports where a complainant cannot be identified, Northwestern may take steps within its control to eliminate, address, and prevent recurrence of the reported conduct.

C. Distribution of Reports by Respondent Affiliation

The following chart illustrates the respondent affiliation for each of the reports received by the Office of Equity during the 2018-19 academic year. The respondent is the person who is alleged to have engaged in discrimination, harassment or sexual misconduct. Of the 555 reports received, 157 (28.3%) of the reports were against people not affiliated with Northwestern or people whose identity was unknown. For example, this includes reports about behavior by unaffiliated dating/domestic partners as well as incidents occurring off campus by non-Northwestern community members.²

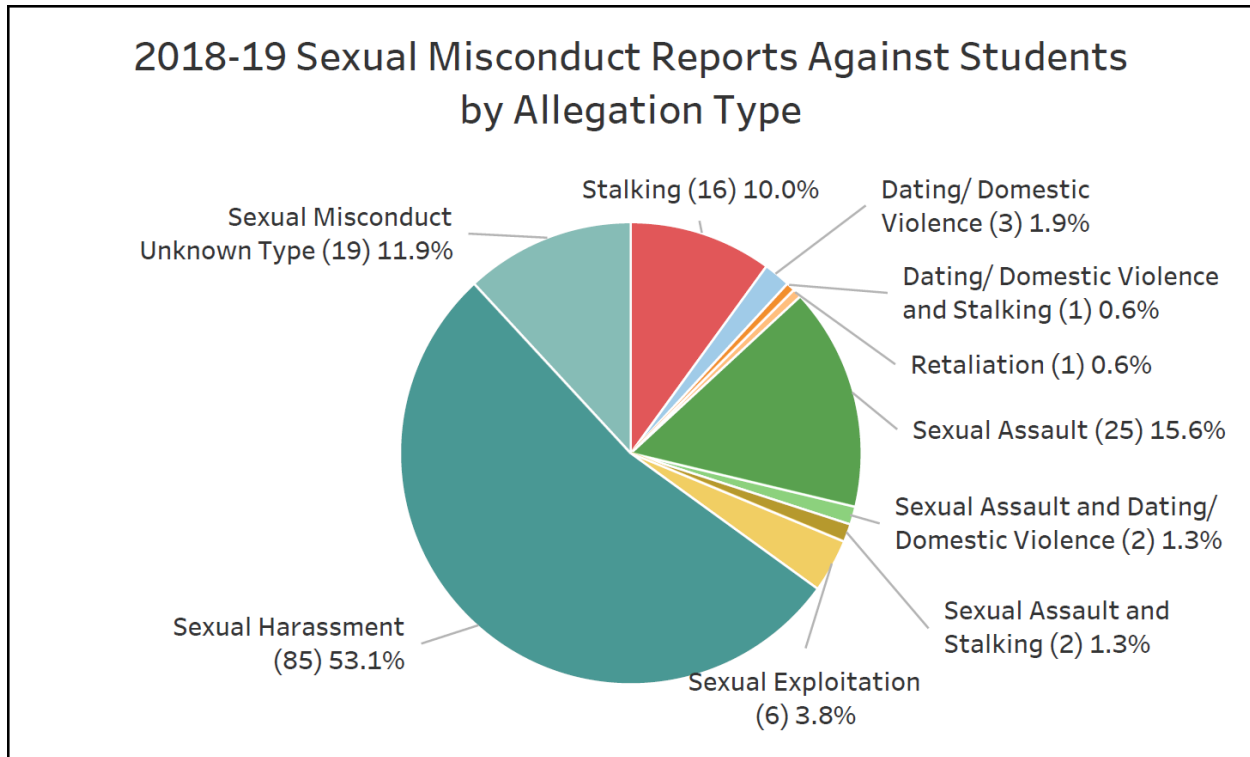


² When Northwestern receives reports alleging misconduct by unidentified persons, or persons not affiliated with the University (and not otherwise connected to a University program or activity), support and resources are offered to the impacted individual(s) and other measures that may be needed to secure the safety of the community are taken; however, in most circumstances, the University will not conduct an investigation.

D. Reports Against Students

1. Distribution of Reports Involving Student Respondents by Category of Violation Alleged

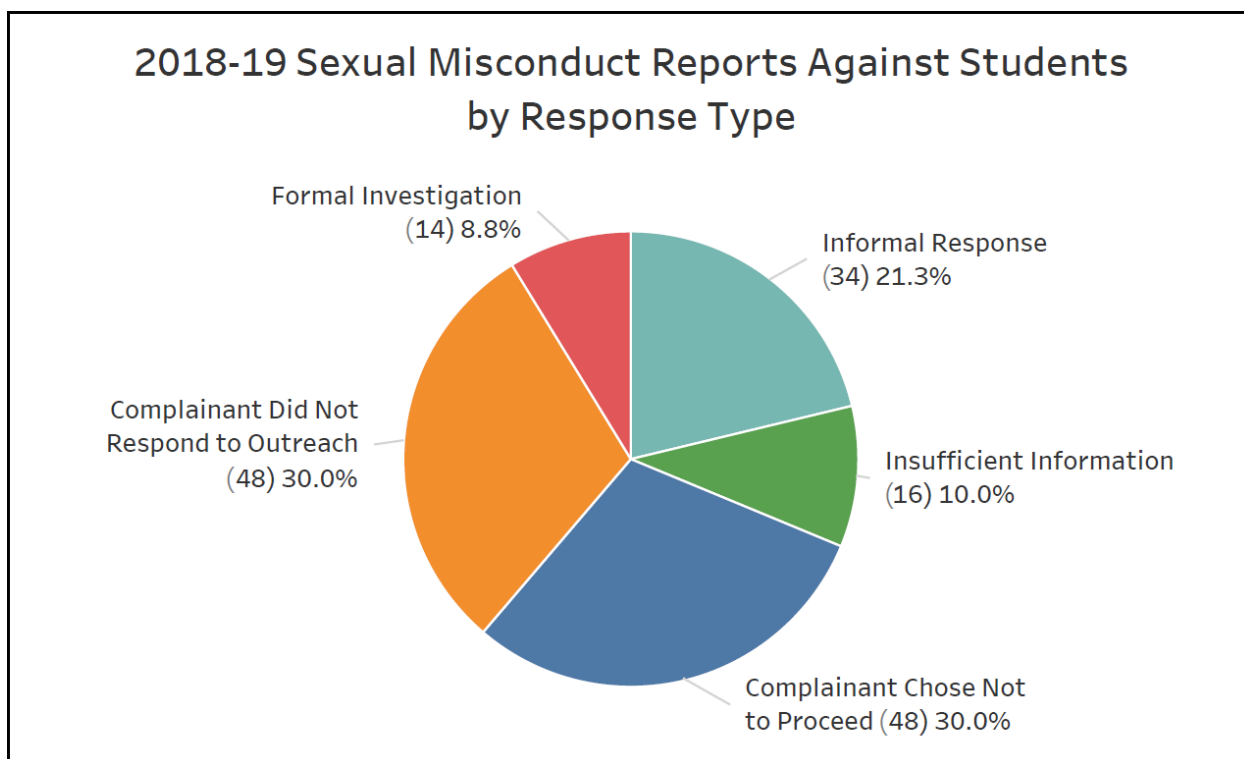
Between September 1, 2018, and August 31, 2019, the Office of Equity received 160 reports alleging that Northwestern students engaged in sexual misconduct. Note: Reports alleging that Northwestern students engaged in violations of the Policy on Discrimination and Harassment were handled by the Office of Student Conduct and are not included in this report.



2. How Complainants Elected to Proceed

When a report is received from any source, including directly from impacted individuals and indirectly through others, the Office of Equity reaches out to the individual(s) who may have experienced misconduct to make them aware of the options and resources available to them. In cases where an individual reporting misconduct requests anonymity or does not wish to proceed with an investigation, the Office of Equity will attempt to honor that request but, in some cases, the Office of Equity may determine that it needs to proceed with an investigation. In such cases, the Office of Equity will not compel an individual to participate. Individuals impacted by sexual misconduct may request support from the Office of Equity even if they do not choose to participate in the University's Complaint Resolution Process.

The following chart illustrates how the 160 reports of sexual misconduct against students were handled. In cases where a complainant wished to proceed with adjudication of a complaint against a student and there was reasonable information to suggest a policy violation may have occurred, the case was handled through **formal resolution**, which involved investigation and, in some cases, a sanctioning panel. In some cases where formal resolution was not desired by the complainant or when there was not enough information to proceed with formal resolution, **informal action** was used as a way to prevent the recurrence of sexual misconduct and remediate its impact. Informal action does not result in findings related to responsibility, or in sanctions. For example, informal action may have included educational or advisory meetings with respondents or trainings. Complainants who chose not to proceed with a complaint resolution process were offered support and resources.³



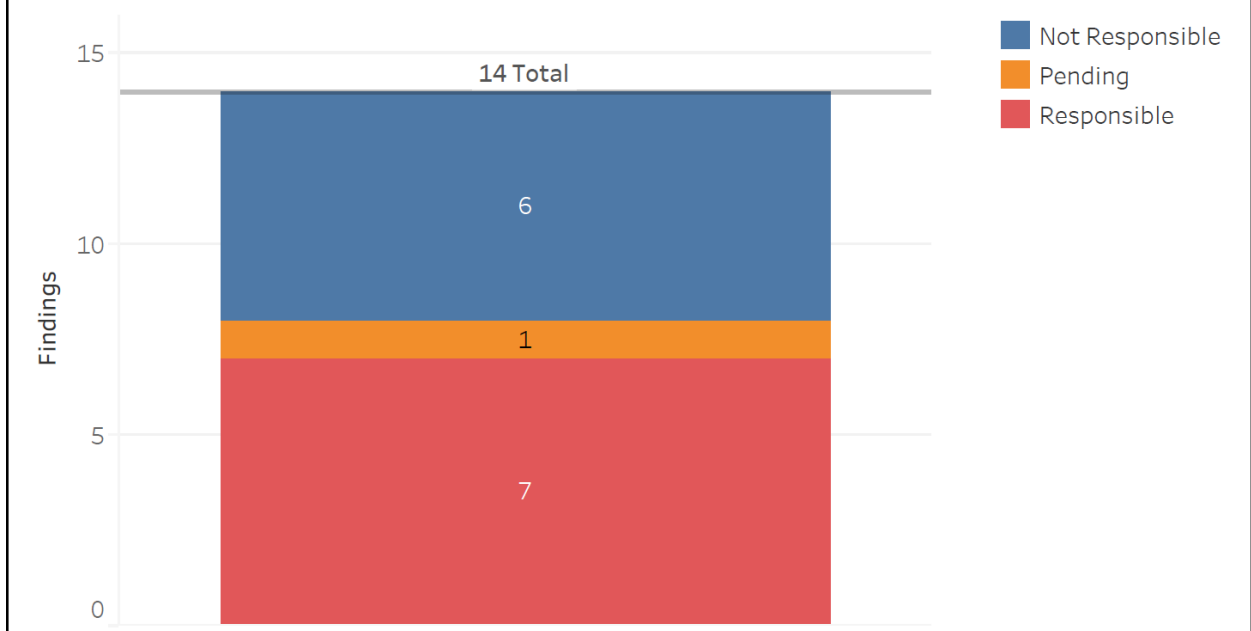
3. Outcomes in Adjudicated Student Cases

In student matters, cases that did not have the potential to result in separation from the University were investigated and resolved by the Office of Equity using an administrative process. Cases that had the potential to result in separation from the University, including suspension or expulsion, were investigated by the Office of Equity; in cases where a policy violation was found, the matter was resolved by **a sanctioning panel** facilitated by the Office of Student Conduct.

The following chart illustrates adjudication outcomes of the 14 student cases that proceeded through the formal resolution process during the 2018-2019 academic year.

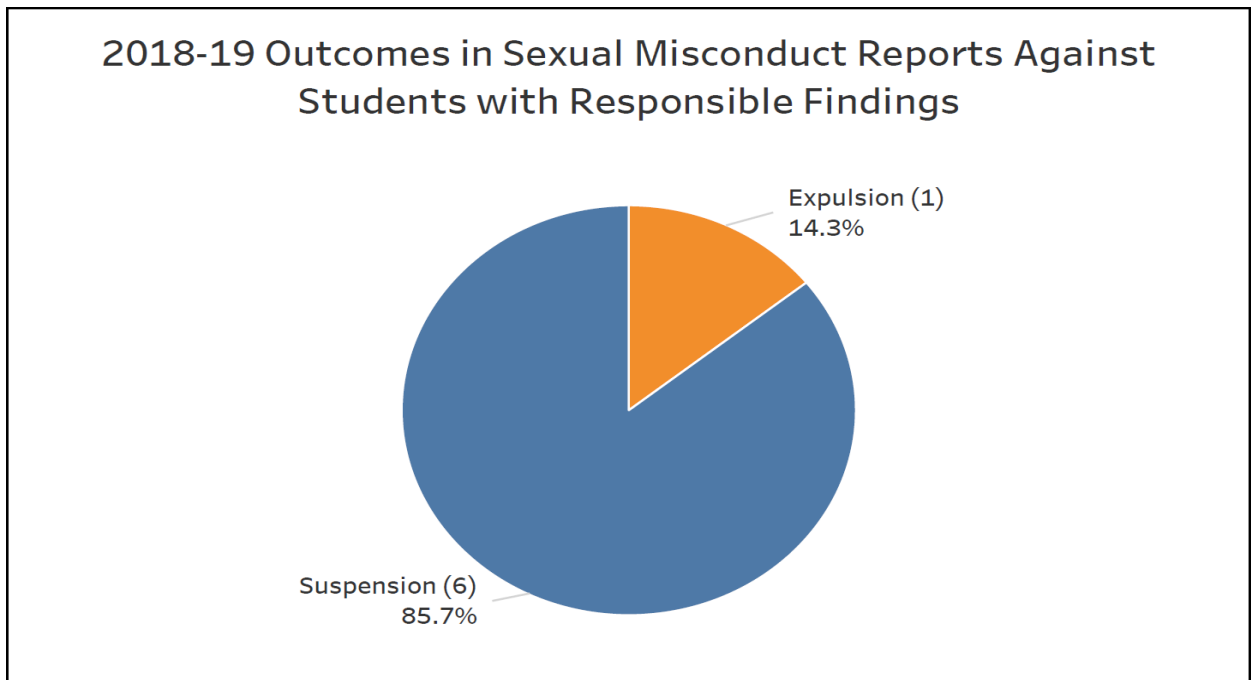
³ Of the 48 reports where complainants chose not to proceed, 9 complainants met with the Office of Equity, 18 additional complainants received advocacy from the Office of Equity for interim and/or supportive measures, and 3 complainants were referred by the Office of Equity to campus partners who took action to address the reported concern.

2018-19 Findings in Sexual Misconduct Reports Against Students That Proceeded Through Formal Resolution



Some cases resulted in multiple sanctions for a respondent (e.g. probation and an educational sanction). The most severe sanction each respondent received is reflected in this chart.

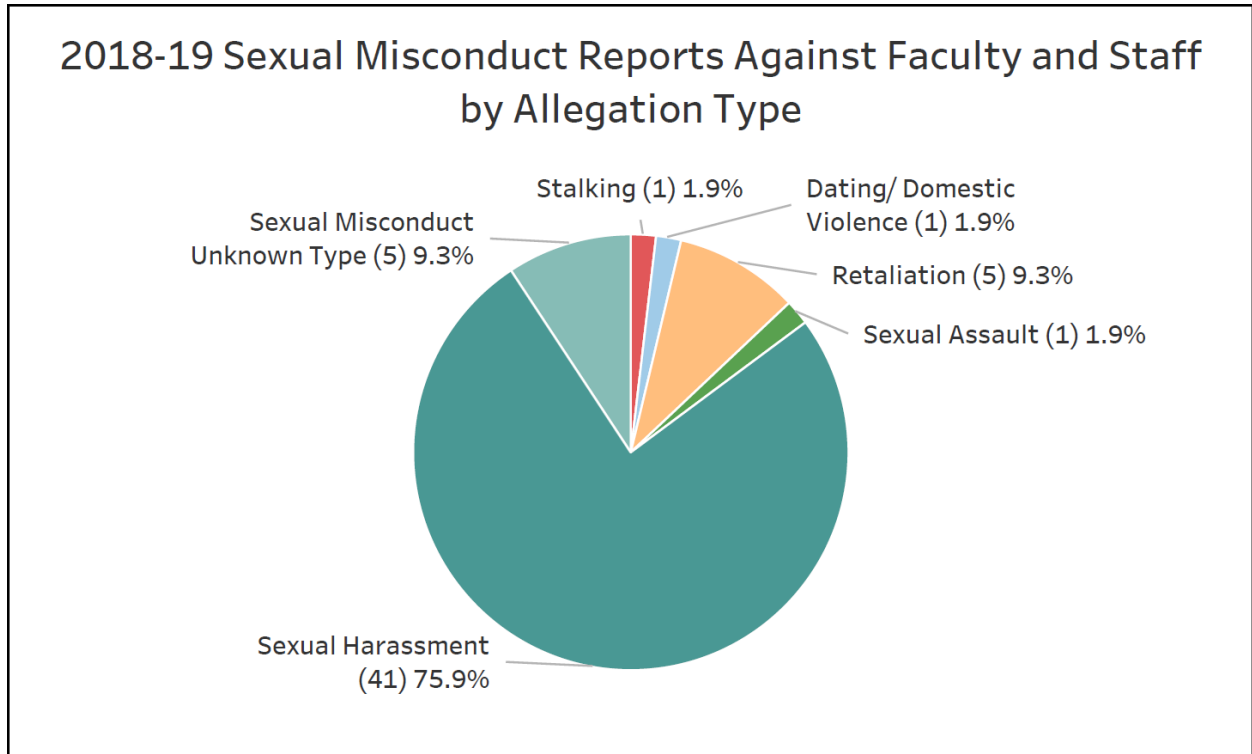
2018-19 Outcomes in Sexual Misconduct Reports Against Students with Responsible Findings



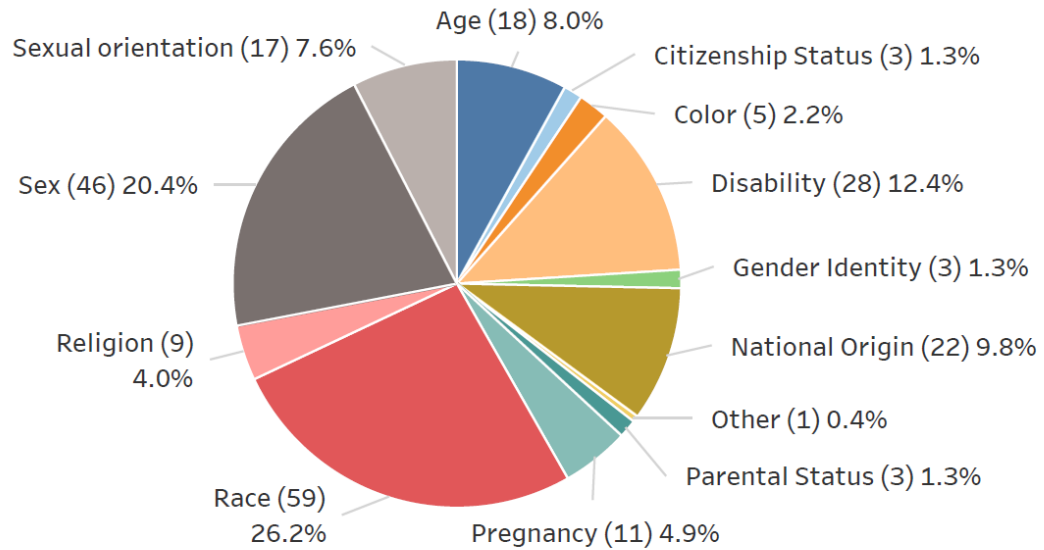
E. Reports Against Faculty and Staff

1. Distribution of Reports Involving Faculty and Staff Respondents by Category of Violation Alleged

During the 2018-2019 academic year, the Office of Equity received 206 reports involving faculty or staff respondents. 54 of these reports included allegations of sexual misconduct and 158 reports included allegations of discrimination and harassment (6 reports included allegations of both sexual misconduct and discrimination and harassment and are thereby reflected in both charts). The following charts illustrate the types of allegations that were reported. Please note that discrimination and harassment reports could articulate more than one basis.



2018-19 Discrimination/Harassment Reports Against Faculty and Staff by Basis

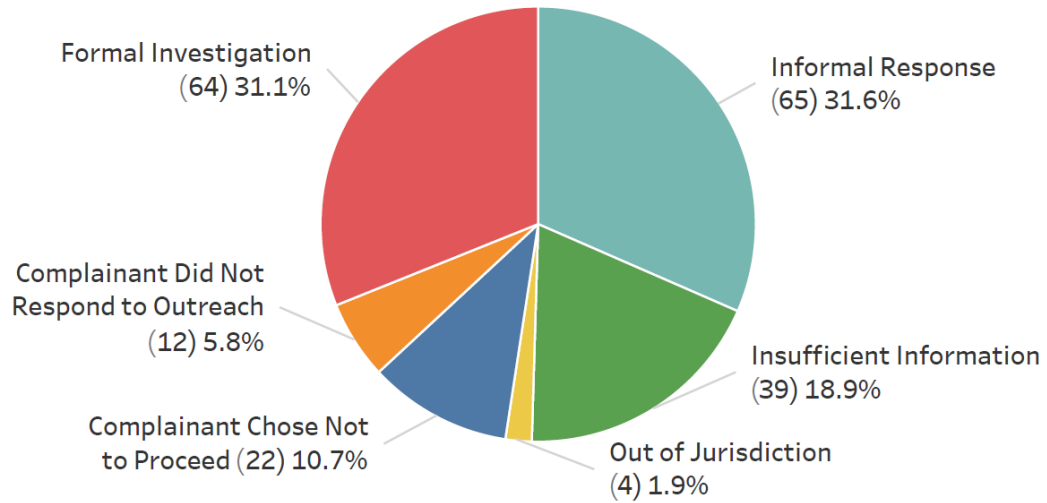


2. How Complainants Elected to Proceed

As described above, when the Office of Equity receives a report from any source, including directly from impacted individuals and indirectly through others, the Office of Equity reaches out to the individual(s) who may have experienced misconduct to make them aware of their options and the resources that are available to them. In cases where an individual reporting misconduct requests anonymity or does not wish to proceed with an investigation, the Office of Equity will attempt to honor that request but, in some cases, the Office of Equity may determine that it needs to proceed with an investigation. In such cases, the Office of Equity will not compel an individual to participate.

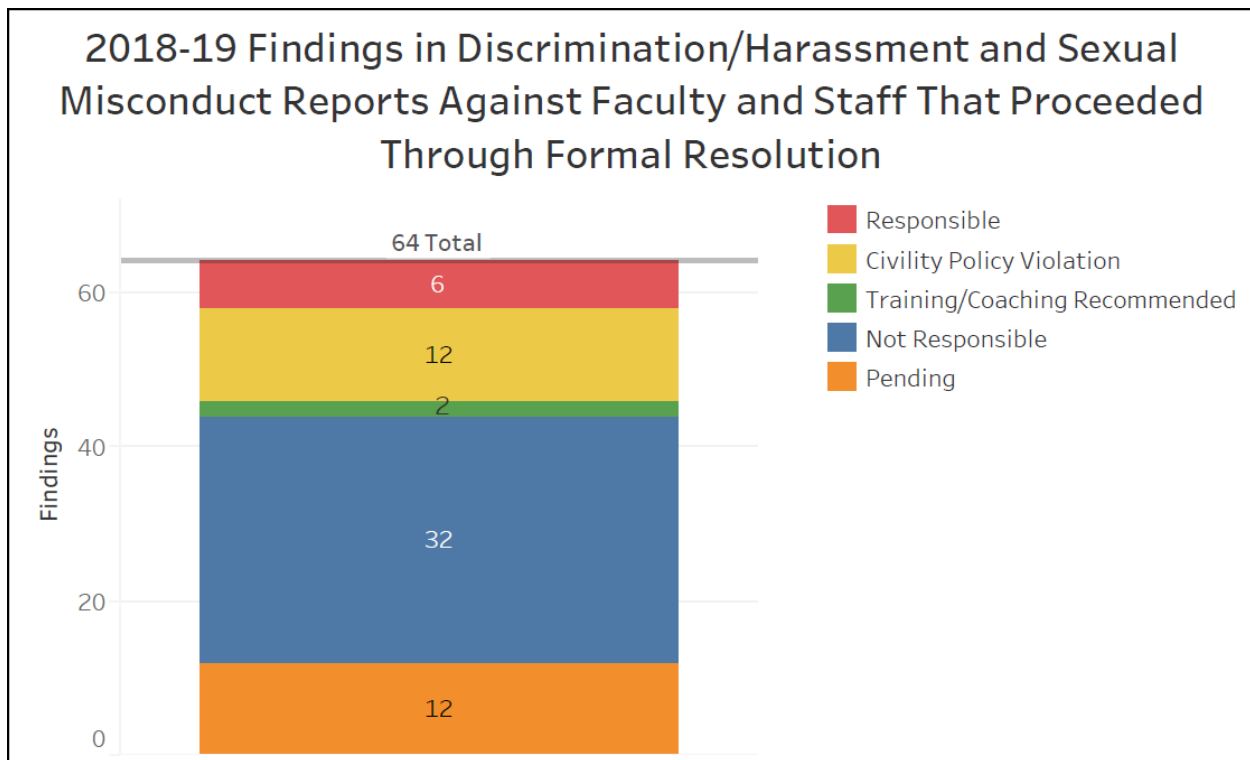
The following chart illustrates how reports of sexual misconduct, discrimination and harassment against faculty and staff were handled. In cases where a complainant wished to proceed with adjudication of a complaint against a faculty or staff member, and there was reasonable information to suggest a policy violation may have occurred, the case was handled through **formal resolution**, which involved an investigation. In some cases where formal resolution was not desired by the complainant or when there was not enough information to proceed with formal resolution, **informal action** was used as a way to prevent the recurrence of discrimination harassment, or sexual misconduct and remediate the impact. Informal action does not result in findings related to responsibility, or in sanctions. For example, informal action may have included educational or advisory meetings with respondents, or educational programming for departments or units.

2018-19 Discrimination/Harassment and Sexual Misconduct Reports Against Faculty and Staff by Response Type



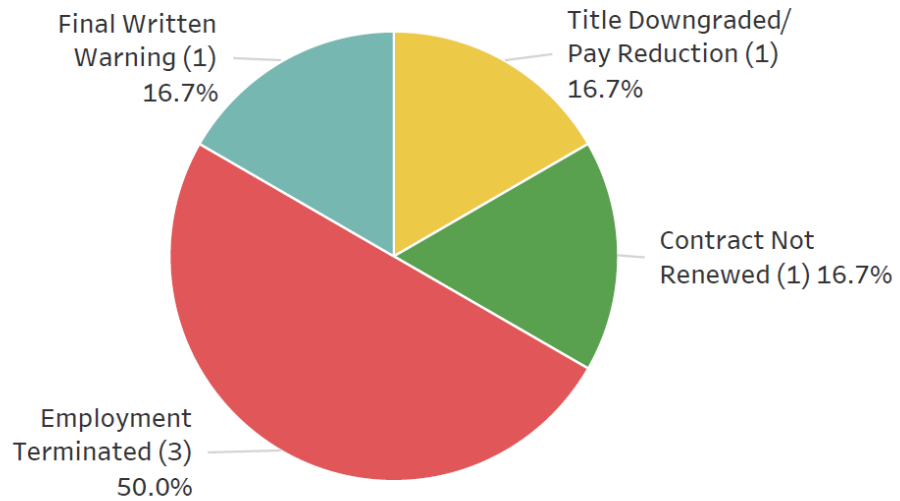
3. Outcomes in Adjudicated Faculty/Staff Cases

The following charts illustrate the findings and outcomes of the 64 reports against faculty and staff that were formally resolved through investigation during the 2018-19 academic year. Of the 46 investigations in which the respondent was determined not responsible pursuant to the Policy on Discrimination and Harassment or the Policy on Sexual Misconduct, the Office of Equity identified concerns in 14 of the investigations that the individual had engaged in conduct contrary to another applicable policy such as the University's Guidelines on Civility and Mutual Respect and Standards of Business Conduct.



In matters where a policy violation is found, disciplinary consequences are imposed by the applicable academic department or administrative unit. For staff respondents, the Office of Equity provides findings of a policy violation to the Office of Human Resources and the respondent's supervisor(s), who are responsible for deciding what sanctions or corrective actions should be imposed on the respondent, in accordance with the procedures set forth in the Staff Handbook. For faculty respondents, the Office of Equity makes a recommendation regarding whether the policy violation found warrants considering termination or suspension. The report and the recommendation are sent by the Office of Equity to the faculty member's department chair and/or dean, and the Associate Provost for Faculty. Sanctions or corrective actions are determined in accordance with the procedures set forth in the Faculty Handbook.

2018-19 Outcomes in Discrimination/Harassment and Sexual Misconduct Reports Against Faculty and Staff with Responsible Findings



III. Reasonable Accommodations for Employees with Disabilities and Pregnant Employees and Students

The Office of Equity works with faculty, staff and job applicants with disabilities to provide reasonable accommodations. The Office of Equity also provides pregnancy accommodations for faculty, staff, and students. Information and FAQs regarding the reasonable accommodation process administered by the Office of Equity are available at: <https://www.northwestern.edu/equity/policies-procedures/accommodation/index.html>. The University supports students with disabilities through AccessibleNU, which is part of the Division of Student Affairs.

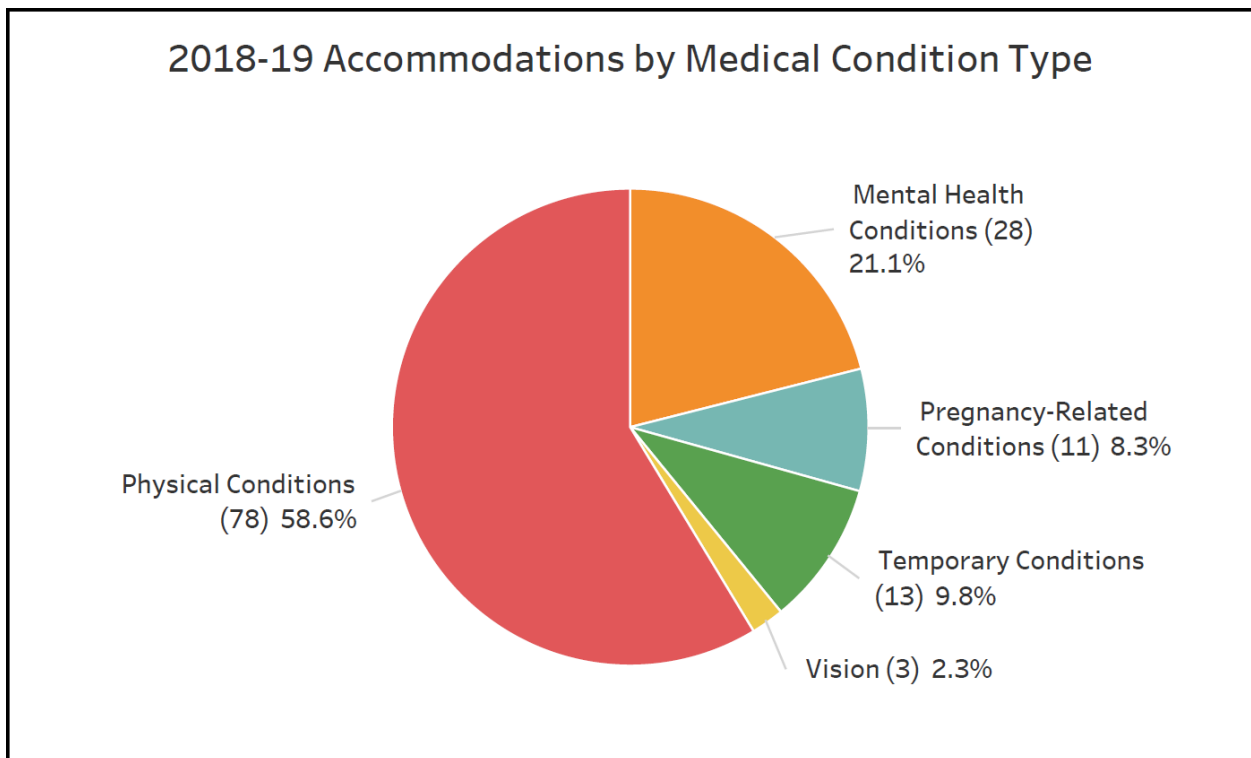
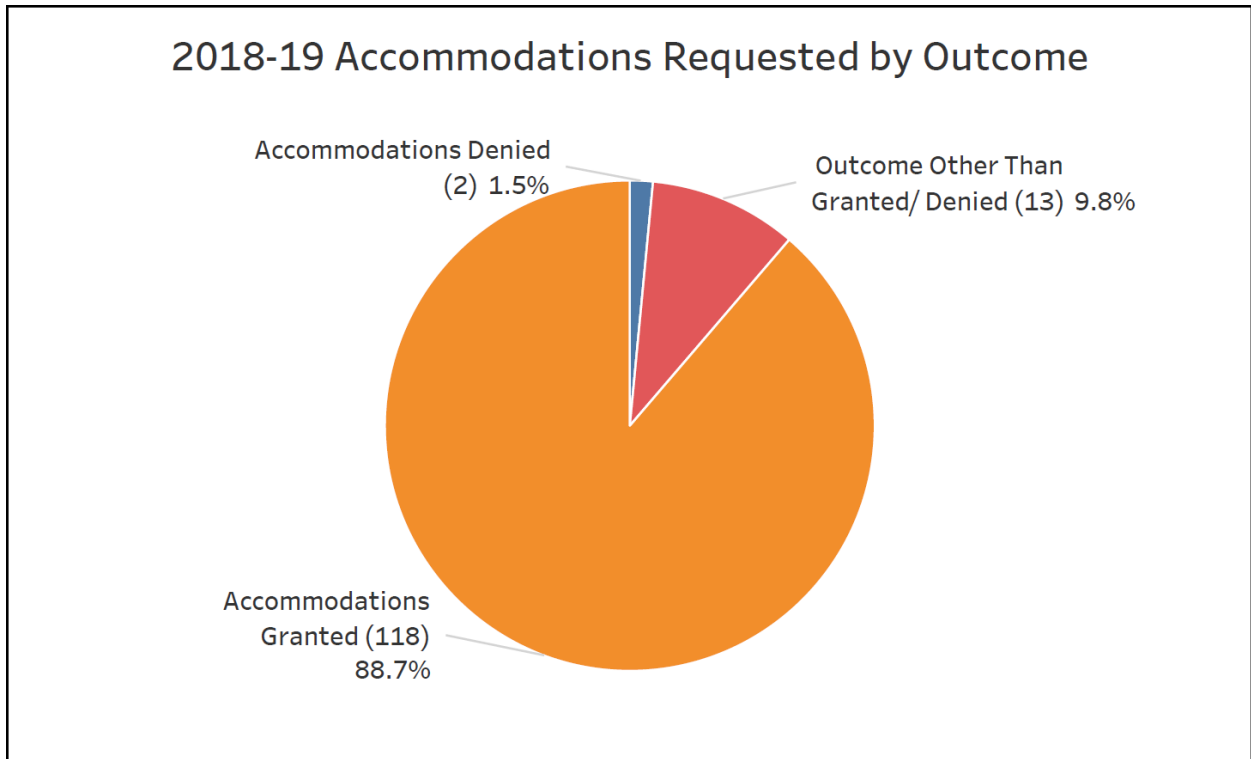
The Office of Equity also reviews accessibility issues reported by the Northwestern community and visitors. The University's [new Accessibility website](#) provides a central location where community members and visitors can find resources and report accessibility issues. The Office of Equity partnered with NUIT, AccessibleNU, and Global Marketing to create and launch the website in summer 2019.

Additionally, the Office of Equity works to address physical accessibility issues. For instance, the Office of Equity approved the installation of power door openers and bars in the Crown and Tech buildings to facilitate access for community members with mobility impairments. The Office of Equity also provided assistance to Feinberg School of Medicine for the installation of power door openers and directional signage, and to Norris University Center for the creation of an accessible parking space closer to its north entrance. Additionally, the Office of Equity has consulted with numerous departments regarding the provision of accommodations at employee events and trainings, as well as advised Segal Visitors Center on the provision of captioning during its programs.

A. Overview of Accommodation Requests

During the 2018-19 academic year, the Office of Equity received 133 requests for accommodations. This number includes new accommodation requests, alternative accommodations, extension requests, and adjustments to existing accommodations. When the Office of Equity receives a request for a workplace accommodation, the Office engages in an interactive process with the requestor of the accommodation. That interactive process involves consultation with the requestor, the requestor's health care providers, and relevant University departments (such as Parking, Facilities, etc.). The Office of Equity seeks to implement the requestor's preferred accommodations when possible. In some cases when the preferred accommodation may not be an option, the Office of Equity engages with all parties to identify effective alternative accommodations. Denial of accommodation requests is a rare occurrence because the interactive process succeeds in identifying reasonable accommodations in most cases.

The following charts illustrate the outcomes of these requests and the types of medical conditions accommodated.



Accommodations related to the above conditions vary based on the impact of the condition on the individual who is seeking an accommodation. The accommodations approved in the 2018-19 academic year included (among many others):

- Ergonomic equipment for individuals with chronic musculoskeletal conditions and sciatica;
- The use of emotional support animals;
- Temporary reserved parking spots, ergonomic adjustments, and work-from-home arrangements;
- Lighting adjustments and anti-glare screens to mitigate migraines; and
- Flexible scheduling to attended medical appointments and treatment programs.

IV. Affirmative Action Planning

The Office of Equity is responsible for developing the University's annual Affirmative Action Plan for Women and Minorities and the Affirmative Action Plan for Individuals with Disabilities and Protected Veterans (collectively referred to as "AAPs"), which provide a comprehensive analysis of the diversity of the University's workforce. The affirmative action program is designed to help the University identify areas in which progress can be made, recognize areas in which progress has been made, and assist Northwestern in its continued efforts to develop initiatives that foster a diverse and inclusive community.

During the 2018-19 academic year, the Office of Equity worked to restructure several components of the University's AAPs to allow for a more effective availability/utilization analysis. Examples of enhancements include:

- *Completed review and restructure of AAP job groups:* Job groups within the AAP are groupings of similarly situated employee titles based on the content of work performed. Job groups are formed in order to provide a more meaningful analysis for comparing the University's population to that of the market availability estimates. The newly developed job group structure increased the number of job groups from 35 to 52 in order to more accurately categorize the types of work being performed at the University for market comparison;
- *Enhanced Availability Data:* Reviewed the availability data assigned within each AAP job group to refine the market availability comparison. This included analysis of position descriptions for University titles as well as assigned US Census occupation titles to ensure an accurate comparator. For faculty job groups an analysis of IPEDS classification of instructional program codes being compared to teaching disciplines within each job group was performed to ensure accurate comparators and to align with similar analyses performed by the University's Office of Institutional Research.
- *Improved Narrative Component:* The narrative section of the AAP for Women and Minorities is now over 90 pages and details the University's processes and policies that are relevant to affirmative action;
- Coordinated with Northwestern's Talent Acquisition team to implement inclusion of job group underutilization data within their regular reporting structure for ease of access to information as part of their strategic planning in the recruiting process for open positions;
- Coordinated with the Faculty Operations team to provide utilization/availability reporting as part of the annual faculty hiring planning process and developed a process for reporting to analyze aggregate applicant pool data out of the University's new Faculty Recruiting System(FRS);

- Created a series of division-based reports specific to school/administrative units to break down the AAP data for individualized reporting to senior stakeholders for their areas.

V. Training Initiatives

A crucial component of the Office of Equity's work is educating the campus community about their rights and responsibilities under Northwestern's policies on harassment, discrimination, and sexual misconduct. Beyond baseline training, the Office of Equity also provides targeted training for units, departments, and student groups aimed at creating a campus culture of healthy sexuality, and one in which people of all identities feel welcomed, supported, and empowered. The Office of Equity works with students, staff, faculty and third parties to create customized trainings.

During academic year 2018-2019, the Office of Equity provided in-person training to 5,044 people. The in-person trainings reached the following populations:

- Students: 2,521
- Staff: 2,030
- Faculty: 401
- Third parties: 92

Particular in-person trainings of note included:

- Fall 2018: TGS new students; Medill faculty; Chemistry faculty, Math faculty; Council of Chairs
- Winter 2018: Human Resources all staff; Medill, Kellogg, Pritzker, School of Communications Senior Directors of Faculty Operations; Library staff; Buffett Center all staff; Pritzker faculty and staff; ISGMH staff and faculty; NU-Q students, staff, and faculty; Alumni Relations and Development all staff; Global Marketing and Communications all staff; Athletics all staff; Football team; Spirit Squad; Bienen faculty; Medill staff
- Spring 2019: TGS Deans Office all staff; Weinberg Deans Office all staff; Associate Student Government Leaders; Radio, Television, and Film faculty

Additionally, the Office of Equity provided online sexual misconduct prevention training to 18,689 members of the community:

- Students: 16,360
- Staff: 1,733
- Faculty: 596