WASHINGTON COLLEGE

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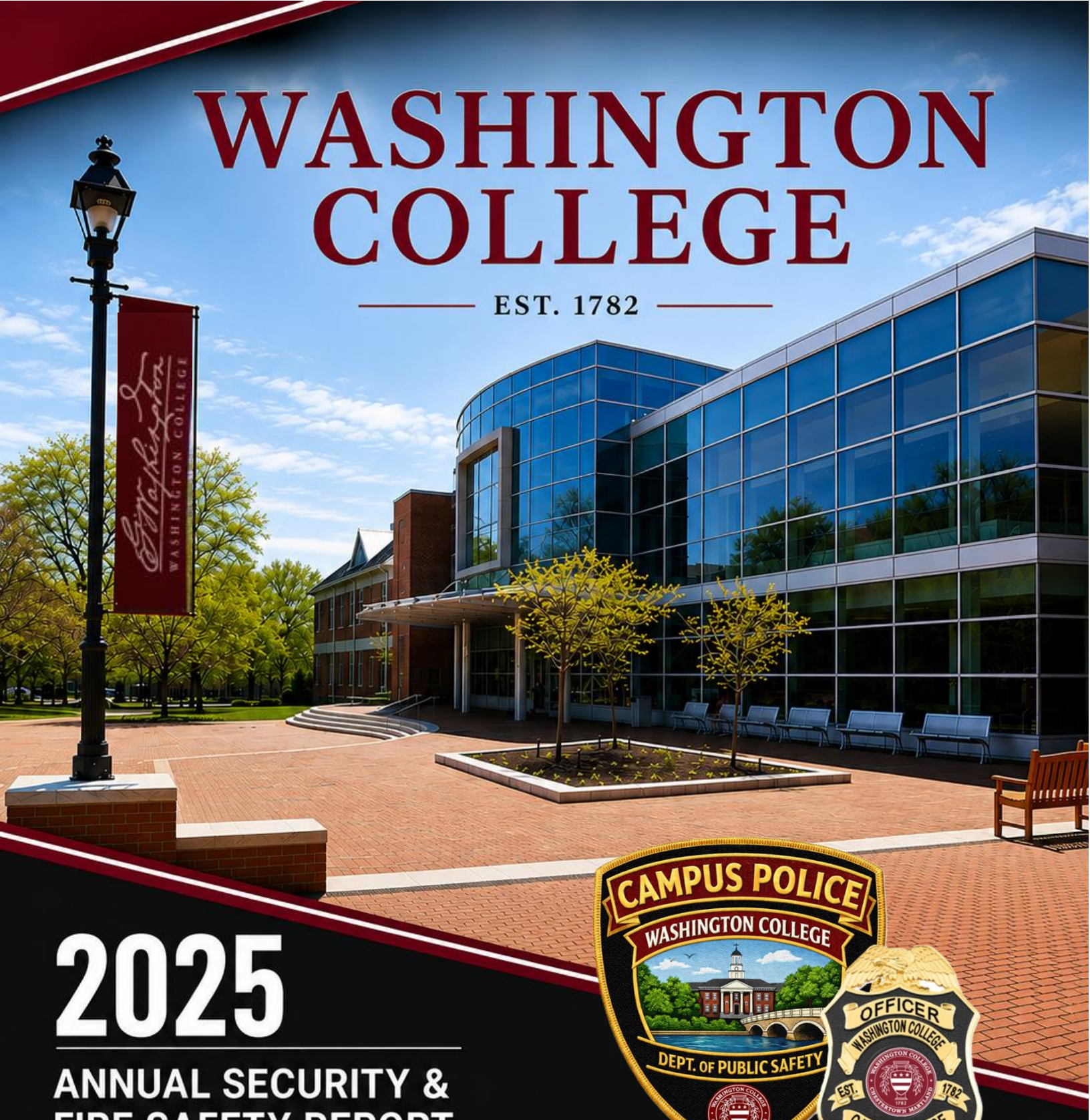

2025

ANNUAL SECURITY & FIRE SAFETY REPORT

Clery Act Compliance | Transparency | Community Safety

ANNUAL SECURITY REPORT FOR
CALENDAR YEARS 2023, 2024, 2025

PUBLISHED IN
2026

CAMPUS POLICE
410-778-7810

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INTRODUCTION

Welcome to the Washington College Annual Security and Fire Safety Report (ASR/ASFSR)**.** This report is designed to provide students, faculty, staff, prospective members of our community, and visitors with important information about campus safety, campus policies, emergency procedures, crime prevention programs, available resources, and reported crime and fire statistics.

Washington College publishes this report in accordance with the federal **Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act (Clery Act)**. The report reflects the College's commitment to transparency and to providing our community with the information necessary to make informed decisions about personal and campus safety.

Throughout this report, readers will find information regarding **Campus Police services and authority, emergency notifications and timely warnings, crime reporting procedures, Campus Security Authorities (CSAs), crime prevention and educational programs, sexual assault and interpersonal violence resources, alcohol and drug policies, emergency preparedness, fire safety, and other important campus safety policies and procedures**. The report also contains the crime and fire statistics required under federal law.

Creating and maintaining a safe campus is a shared responsibility. While the **Washington College Campus Police operates 24 hours a day, seven days a week**, the continued safety of our community also depends upon the awareness, cooperation, and involvement of our students, faculty, staff, and visitors. Everyone is encouraged to remain aware of their surroundings, make responsible decisions, look out for one another, and promptly report crimes, emergencies, suspicious activity, or other safety concerns.

If you see something, say something. By communicating, remaining engaged, and working together, we can continue to strengthen the safety and well-being of the entire Washington College community.

A MESSAGE FROM THE CHIEF OF CAMPUS POLICE/EXECUTIVE DIRECTOR OF PUBLIC SAFETY

To the Washington College Community,

As Chief of Campus Police, I am proud to present Washington College's Annual Security and Fire Safety Report. Our department is committed to providing a safe, secure, and welcoming environment for every student, faculty member, staff member, and visitor.

Campus safety is about more than responding to emergencies. It is built through preparation, prevention, communication, trust, and strong relationships. Our officers are available 24 hours a day, seven days a week to serve and support our community with professionalism, fairness, and respect.

Safety is also a shared responsibility. I encourage everyone to remain aware, look out for one another, and promptly report crimes, suspicious activity, or safety concerns to Campus Police immediately. If you see something, say something.

I am proud to serve Washington College and look forward to continuing to build a strong partnership between Campus Police and the community we serve.

Ryan Colman
Chief of Campus Police
Executive Director of Public Safety

MISSION STATEMENT

The mission of Washington College Campus Police is to protect, serve, and create a safe and academically sound environment for the students, faculty, and staff at the College. Additionally, the department supports the College's mission to "challenge and inspire emerging citizen leaders to discover lives of purpose and passion"

The Washington College Campus Police is responsible for providing public safety, risk management, environmental safety, and identification services to the college community.

We recognize that our authority not only comes from the State of Maryland and Washington College Policies but also comes from the Constitution of the United States, a continually reaffirmed expression of the will of the people we are dedicated to upholding its expression of the fundamental value of all people.

The department serves with integrity, discretion, and expediency, and in a fair, proper, and thorough manner. The conduct of each member of the department will be professional and honorable. We work with other organizations to create a campus environment that is socially rich and diverse.

We view our community and our employees as invaluable assets whose welcome diversity encourages us to strive for a place where their expression and worth can flourish. We do this with the clear understanding that our ultimate responsibility is to enhance and celebrate the safest college experience.

CAMPUS POLICE AUTHORITY AND LOCATION

The Washington College Campus Police, Department of Public Safety, is located on the ground floor of Cullen Hall. Administrative office hours are 8:00 a.m. to 4:00 p.m., Monday through Friday; however, Campus Police provides continuous law enforcement and public safety services to the Washington College community 24 hours a day, 7 days a week, 365 days a year.

Campus Police Officers maintain a visible presence throughout campus by conducting foot, bicycle, and vehicle patrols of College property, including academic buildings, residence halls, parking areas, and campus grounds. Officers work to promote a safe and secure environment through proactive patrol, community engagement, emergency response, crime prevention, and the enforcement of applicable federal, state, and local laws, as well as Washington College policies.

Police Authority

The Washington College Campus Police, Department of Public Safety, employs sworn Campus Police Officers who are commissioned under Maryland law as Special Police Officers/Campus Police Officers. These commissions provide officers with law enforcement and arrest authority on Washington College property throughout the State of Maryland.

Within their jurisdiction, Campus Police Officers are authorized to perform the duties and exercise the powers granted to them under Maryland law, including making arrests, issuing citations, obtaining warrants, conducting criminal investigations, and enforcing applicable laws. Officers also support the enforcement of Washington College policies and respond to calls for service, emergencies, and other public safety concerns occurring on College property.

Sworn Campus Police Officers wear distinctive uniforms, badges, and departmental identification that clearly identify them as campus law enforcement officers. Campus Police maintains a visible presence throughout the College through marked vehicle, bicycle, and foot patrols.

Washington College Campus Police also recognizes the importance of strong partnerships with surrounding law enforcement and public safety agencies. The department works closely with local, county, and state law enforcement agencies through information sharing, training, emergency response, investigations, and other collaborative efforts.

Washington College works closely with the Chestertown Police Department and Kent County Sheriff's Office and has an established working relationship between the two agencies.

For major events or circumstances requiring additional personnel or resources, Campus Police may also coordinate with outside allied law enforcement agencies and utilize approved special-event personnel to support the safety of the Washington College community.

Maryland Statutory Authority

Maryland Code, Public Safety Article, Title 3, Subtitle 3, § 3-307 – Scope of Commission.

Md. Code Ann., Public Safety § 3-307

Reporting Criminal Activity and Emergencies

Washington College encourages all members of the campus community to promptly and accurately report crimes, suspicious activity, and emergencies.

To report a crime, suspicious activity, or other public safety concern, contact **Washington College Campus Police at 410-778-7810** (extension **7810** from a campus telephone). For emergencies requiring immediate police, fire, or emergency medical response, **dial 911**.

Campus Police Officers are available **24 hours a day, 7 days a week, 365 days a year** and will respond to reports of criminal activity, emergencies, and other calls for service occurring within their jurisdiction. When appropriate, Campus Police Officers will investigate the incident and prepare an official incident report.

Depending on the circumstances, information may also be shared with appropriate outside allied law enforcement agencies or College offices, including Student Affairs, Human Resources, the Title IX Office, or other officials with responsibilities related to the incident. Reported information is also evaluated for applicable Clery Act reporting requirements, Timely Warnings, Emergency Notifications, Daily Crime Log entries, and annual statistical disclosures.

Individuals may also report crimes to designated Campus Security Authorities (CSAs), the College's Title IX Coordinator, or other appropriate College officials.

Confidential Reporting Procedures

Washington College encourages the accurate and prompt reporting of crimes to Campus Police and appropriate law enforcement agencies when a victim elects to make such a report or is unable to do so.

Individuals who do not wish to pursue action through the College or criminal justice system may still have options for sharing information confidentially or privately. When permitted by law and College policy, information may be documented without publicly identifying the reporting party.

Information received through confidential or private reporting may assist the College in identifying patterns or trends, evaluating potential threats to the campus community, and fulfilling applicable federal reporting requirements while protecting the privacy of those involved to the greatest extent possible.

Certain circumstances may require the College to take additional action to protect the safety of an individual or the campus community. Reports involving sexual harassment,

sexual assault, dating violence, domestic violence, stalking, or other conduct covered by College policy may also be shared with the Title IX Coordinator as required by applicable law and College policy.

Daily Crime Log

Washington College Campus Police maintains a Daily Crime Log containing information regarding reported criminal activity, including the nature, date, time, and general location of reported crimes and the disposition of the complaint, if known.

The Daily Crime Log covering the most recent 60-day period is available for public inspection during normal business hours. Crime Log information older than 60 days will be made available for inspection within two business days of a request.

When additional information regarding an existing Crime Log entry becomes available, the log will be updated consistent with applicable Clery Act requirements.

Information may be temporarily withheld from the Daily Crime Log when disclosure is prohibited or when releasing the information would jeopardize the confidentiality of a victim, an ongoing criminal investigation, the safety of an individual, cause a suspect to evade detection or flee, or result in the destruction of evidence.

Campus Security Authorities

Under the Clery Act, certain individuals and organizations are designated as **Campus Security Authorities (CSAs)** based upon their responsibilities and relationship with students and campus activities.

CSAs serve an important role in Washington College's Clery Act compliance program. When a CSA receives a report of a crime that may fall within the Clery Act's reporting requirements, the CSA is responsible for reporting the information to the appropriate College official for evaluation and statistical reporting.

Washington College provides CSAs with resources to assist them in understanding and fulfilling their responsibilities, including:

- **Clery Crime Definitions**
- **CSA Training Materials**
- **CSA Reporting Form**

CSA reports are used to assist the College in maintaining accurate crime statistics and determining whether additional actions, such as a Timely Warning or Emergency Notification, may be necessary.

Annual Clery Act Compliance and Statistical Disclosure

Washington College annually collects and reviews crime statistics from Campus Police, Campus Security Authorities, and applicable local law enforcement agencies for inclusion in the College's Annual Security and Fire Safety Report.

Campus Security Authorities are provided training and reminders regarding their responsibility to report applicable crimes to the College for Clery Act purposes.

Professional counselors, when acting within the scope of their professional counseling responsibilities, are treated in accordance with the applicable Clery Act reporting exemptions. When appropriate, counselors may inform individuals of available options for voluntarily reporting crimes for inclusion in the College's crime statistics.

Washington College compiles applicable crime statistics and publishes them as part of this **Annual Security and Fire Safety Report**. Required crime statistics are also submitted to the **U.S. Department of Education**.

Each year, Washington College provides current students and employees with notice of the availability of the Annual Security and Fire Safety Report and information regarding how to access it.

A paper copy may also be requested by contacting:

Washington College Campus Police
Department of Public Safety
Cullen Hall – Ground Floor
300 Washington Avenue
Chestertown, MD 21620
410-778-7810

Non-campus Property

Washington College does not currently recognize or control off-campus student housing or student organizations with property that meets the College's identified Clery **non-campus property** criteria.

Campus Police may receive information from the Chestertown Police Department or other law enforcement agencies concerning incidents involving Washington College students occurring outside the College's jurisdiction. Such incidents are evaluated for applicable Clery Act requirements based upon the location and circumstances of the reported offense.

Unfounded Crimes

For Clery Act reporting purposes, a reported crime may be classified as **unfounded only when a sworn or commissioned law enforcement officer has fully investigated the reported crime and, based on the results of that investigation and evidence, made a formal determination that the crime report is false or baseless**.

Crimes determined to be unfounded are reported in accordance with applicable Clery Act requirements.

CRIME PREVENTION. SAFETY EDUCATION, AND COMMUNITY OUTREACH

Washington College Campus Police is committed to maintaining a safe and secure educational environment through a comprehensive approach that emphasizes education, prevention, preparedness, community engagement, and collaborative partnerships. Campus safety is a shared responsibility, and members of the Washington College community are encouraged to take an active role in recognizing potential hazards, reporting suspicious or concerning behavior, and becoming familiar with the resources available to them.

Throughout the academic year, Campus Police provides and participates in educational programs, safety presentations, emergency preparedness exercises, and community outreach initiatives designed to increase awareness and provide students, faculty, and staff with practical skills that may help them respond effectively during emergencies.

Programs may be provided during student orientation, employee training, residence life programming, departmental meetings, special events, and other campus activities. Campus Police also works collaboratively with other College departments and local public safety partners to provide specialized education and training when appropriate.

ALICE – Active Shooter Response Training

Washington College Campus Police provides ALICE (Alert, Lockdown, Inform, Counter, and Evacuate) training to help members of the campus community understand options available to them during an active threat or violent critical incident.

ALICE is an options-based response model intended to provide individuals with information that can assist them in making decisions based on the circumstances occurring around them. The program recognizes that emergencies are dynamic and that no single response will be appropriate for every situation.

The ALICE principles include:

- **Alert**: Recognizing signs of danger and quickly communicating information about a potential or confirmed threat.
- **Lockdown**: Securing or barricading an area when evacuation is not a safe or practical option.
- **Inform**: Providing clear and useful information about the location and nature of a threat when possible.

- **Counter**: Using movement, distraction, distance, or other actions as a last-resort strategy when directly confronted by an attacker and when other options are unavailable.
- **Evacuate**: Moving away from the threat and leaving the affected area when a safe evacuation route is available.

Training emphasizes situational awareness, rapid decision-making, communication, evacuation, and personal safety. ALICE training is intended to supplement Washington College's emergency procedures and does not require individuals to confront a dangerous person.

Fire Safety Education

Fire prevention and fire safety are important components of the College's overall emergency preparedness efforts. Campus Police work to educate the campus community regarding fire prevention and appropriate emergency response.

Fire safety education may address topics including:

- Proper procedures for reporting a fire or suspected fire;
- Evacuation procedures and designated evacuation areas;
- The importance of immediately responding to fire alarms;
- Keeping hallways, stairwells, exits, and fire doors unobstructed;
- Safe use of approved electrical appliances and equipment;
- Prohibited items within residence halls;
- Dangers associated with candles, open flames, overloaded electrical outlets, and unauthorized cooking devices;
- Fire extinguisher and fire protection equipment awareness;
- The importance of never disabling or tampering with smoke detectors, alarms, sprinklers, or other fire safety equipment; and
- Procedures for contacting Campus Police or 911 during a fire emergency.

Members of the campus community should treat every fire alarm as an actual emergency and evacuate immediately unless specifically directed otherwise by emergency personnel.

Residence Hall Fire Drills

Washington College conducts fire and evacuation drills within residence halls to help ensure that students understand how to safely evacuate their buildings during an emergency.

Fire drills provide students and College personnel an opportunity to practice evacuation procedures before an actual emergency occurs. During drills, occupants are expected to immediately leave the building using the nearest safe exit, move away from the building, and follow instructions provided by Campus Police, Residence Life staff, or other emergency personnel.

Drills also allow College officials to evaluate evacuation procedures, identify potential safety concerns, and reinforce expectations regarding emergency response.

Participation in fire drills is an important component of campus preparedness. Students should never assume that an activated fire alarm is only a drill.

Emergency Preparedness Education

Campus Police provides education and information concerning emergency preparedness and encourages all members of the Washington College community to become familiar with emergency procedures before an incident occurs.

Emergency preparedness education may include information regarding:

- Severe weather and tornado response;
- Shelter-in-place procedures;
- Building evacuation;
- Active threats and violent incidents;
- Suspicious persons or activity;
- Hazardous conditions;
- Power outages and other infrastructure emergencies;
- Emergency communications and notifications; and
- When and how to contact Campus Police or 911.

Students and employees are encouraged to maintain awareness of their surroundings, familiarize themselves with exits and emergency procedures in buildings they regularly occupy, and promptly follow emergency instructions issued by the College.

Emergency Notification and WAC Alert Education

Campus Police promotes awareness of the College's emergency notification system and encourages members of the campus community to maintain accurate contact information and become familiar with how emergency messages are distributed.

Emergency notifications may provide critical instructions concerning severe weather, dangerous conditions, criminal activity, evacuation, shelter-in-place instructions, or other emergencies affecting the campus community.

Campus Police periodically provides information regarding emergency notification procedures and encourages community members to carefully read emergency messages, follow provided instructions, and avoid spreading unverified information during critical incidents.

Personal Safety and Crime Prevention

Campus Police provides crime prevention and personal safety information designed to reduce opportunities for crime and encourage members of the campus community to take reasonable precautions.

Educational topics may include:

- Maintaining situational awareness;
- Walking in well-lit and populated areas whenever possible;
- Securing residence hall rooms, offices, and vehicles;
- Protecting personal property and valuables;
- Avoid leaving belongings unattended;
- Reporting lost or stolen access cards and keys;
- Recognizing and reporting suspicious behavior;
- Safe use of rideshare and transportation services;

- Vehicle and parking lot safety;
- Online and social media safety;
- Fraud and scam awareness; and
- Contacting Campus Police when assistance or a safety concern arises.

Campus Police encourages community members to report suspicious circumstances promptly rather than attempting to determine independently whether criminal activity is occurring.

Residence Hall and Student Safety Education

Campus Police works with Residence Life and other campus partners to provide safety information specifically relevant to students living in College housing.

Topics may include residence hall security, guest safety, access control, prohibited conduct, securing personal belongings, reporting suspicious activity, emergency evacuation, fire safety, and contacting Campus Police.

Students are reminded not to prop exterior doors, provide unauthorized individuals access to secured buildings, or allow unknown persons to enter residence halls behind them. Community members should promptly report malfunctioning locks, doors, lighting, or other security concerns.

Alcohol and Drug Awareness

Washington College recognizes that alcohol and drug misuse can contribute to unsafe situations, injuries, criminal activity, and other risks to the campus community.

Campus Police supports educational and prevention efforts addressing alcohol and controlled substances and works with appropriate College departments to promote responsible decision-making, awareness of applicable laws and College policies, and recognition of situations requiring medical or emergency assistance.

Educational efforts may address the dangers of impaired driving, alcohol poisoning, illegal drug possession, misuse of prescription medications, and the importance of obtaining immediate assistance when someone may be experiencing a medical emergency.

Sexual Assault, Dating Violence, Domestic Violence, and Stalking Awareness

Washington College provides prevention and awareness education concerning sexual assault, dating violence, domestic violence, and stalking through collaborative efforts involving appropriate College offices and community resources.

Campus Police supports these educational efforts by providing information concerning reporting options, personal safety, preservation of evidence, and resources available to victims and survivors.

Individuals are encouraged to promptly seek assistance when they believe they or another person may be in danger. In an immediate emergency, individuals should contact 911 or Washington College Campus Police at 410-778-7810.

Bystander Awareness and Reporting

Campus Police encourages members of the Washington College community to look out for one another and to report situations that may present a safety concern.

Community members are encouraged to contact Campus Police when they observe suspicious behavior, threats, concerning conduct, unsafe conditions, or circumstances in which another person may require assistance.

Individuals should not place themselves in danger while attempting to intervene. Depending on the circumstances, appropriate action may include contacting Campus Police or 911, obtaining assistance from College staff, creating distance from a dangerous situation, or helping another person reach a safe location.

See Something, Say Something

A safe campus depends on timely communication. Students, faculty, staff, and visitors are encouraged to immediately report suspicious persons, behaviors, vehicles, packages, threats, or circumstances to Campus Police.

Community members are not expected to determine whether something constitutes a crime before making a report. Campus Police would rather receive information and determine that no threat exists than have a potentially serious concern go unreported.

Safety Escorts

Campus Police provides safety-related assistance to members of the campus community when circumstances create a legitimate safety concern. Individuals who feel unsafe traveling across campus or who encounter circumstances that cause concern are encouraged to contact Campus Police for assistance.

Safety escort services are intended to support personal safety and should not be considered a substitute for routine transportation.

Community Policing and Engagement

Washington College Campus Police recognizes that effective campus safety depends upon strong relationships between officers and the community they serve.

Officers regularly participate in community engagement activities that provide students, faculty, and staff opportunities to interact with Campus Police outside of enforcement situations. These interactions allow officers to answer questions, discuss safety concerns, provide educational materials, and establish relationships with community members.

Community engagement activities may include:

- New student orientation and move-in activities;
- Meet-and-greet events;
- Coffee and donuts with Campus Police;
- Snow Cones with Campus Police;
- Campus safety presentations;
- Student organization events;
- Campus recreational activities;
- Educational tabling events; and
- Collaborative programming with other College departments.

These efforts are designed to build trust, increase familiarity with Campus Police personnel and services, and make students more comfortable contacting Campus Police when they need assistance.

New Student and Employee Safety Education

Campus Police participates in orientation and educational programming designed to introduce new students and employees to campus safety resources and expectations.

Information may include how to contact Campus Police, emergency notification procedures, crime reporting, personal safety, residence hall security, emergency preparedness, parking and traffic regulations, and other safety-related resources.

Introducing these resources early helps ensure that new members of the Washington College community understand how to obtain assistance and how they can contribute to maintaining a safe campus.

Collaborative Training and Public Safety Partnerships

Washington College Campus Police maintains relationships with local law enforcement, fire, emergency medical services, emergency management agencies, and other public safety partners.

When appropriate, Campus Police participates in collaborative training, exercises, planning, and educational initiatives designed to strengthen coordination and emergency response capabilities.

These partnerships are particularly important during major incidents that may require resources beyond those immediately available on campus.

Additional Training Opportunities

Campus Police can also provide, coordinate, or support additional safety programs based upon the needs of the campus community. These programs may include topics such as:

- Stop the Bleed and bleeding-control awareness;
- CPR/AED awareness;
- Psychological First Aid;
- Civilian response to active threats;
- Severe weather preparedness;
- Emergency evacuation procedures;

- Workplace violence awareness;
- De-escalation and conflict awareness;
- Fraud, scam, and identity theft prevention;
- Vehicle and pedestrian safety;
- Bicycle safety;
- Theft prevention;
- Special event safety;
- Emergency communications and other crime prevention or;
- Public safety topics identified through campus trends or community needs.

Campus Security Authority (CSA) Training

Washington College identifies individuals who meet the definition of a Campus Security Authority (CSA) under the Clery Act and provides training to help them understand their responsibilities. CSA training explains the individual's role in campus safety, the types of crimes that must be reported, and how and where to report information received.

CSAs are instructed to promptly report Clery-related crimes brought to their attention to Washington College Campus Police so the College can evaluate the information for Clery crime statistics and determine whether a Timely Warning or other campus safety response may be necessary.

The College works to ensure identified CSAs understand that their responsibility is to report information, not investigate incidents or determine whether a crime occurred. Training and educational materials are provided to identified CSAs to promote consistent and accurate reporting and support Washington College's compliance with the Clery Act.

Requesting Safety Training

Washington College departments, student organizations, residence halls, and other campus groups may request safety presentations or educational programming from Campus Police.

Training topics may be customized based upon the needs of the requesting group and the availability of qualified instructors.

Campus Police encourages members of the Washington College community to participate in available training opportunities. Education and preparedness strengthen the College's collective ability to prevent incidents, recognize warning signs, respond appropriately during emergencies, and maintain a safe environment in which students can live, learn, and work.

EMERGENCY NOTIFICATIONS

Timely Warnings

Washington College is committed to providing members of the campus community with timely information regarding crimes that may present a serious or continuing threat to students and employees.

In accordance with the Jeanne Clery Campus Safety Act, Washington College may issue a **Timely Warning** when a Clery Act crime is reported to Washington College Campus Police, a Campus Security Authority (CSA), or otherwise comes to the attention of the College; occurs within the College's Clery Geography; and is determined to represent a serious or continuing threat to the campus community.

The decision to issue a Timely Warning is made on a case-by-case basis after consideration of the facts and circumstances known at the time. Factors considered may include, but are not limited to:

- The nature and seriousness of the reported crime;
- Whether the incident presents a serious or continuing threat to the campus community;
- The location of the incident;
- The time that has elapsed since the incident occurred or was reported;
- Whether a suspect has been identified, located, or apprehended;
- Whether there is a pattern of similar incidents;
- Information available regarding the circumstances of the incident; and
- Whether issuing a warning may assist members of the campus community in protecting themselves or preventing similar occurrences.

The Chief of Campus Police, or designee, is responsible for determining whether circumstances warrant a Timely Warning and for coordinating the issuance of the warning. When circumstances permit, Campus Police may consult with appropriate College officials, including members of the Emergency Operations Group (EOG), Student Affairs, Marketing and Communications, and other appropriate personnel. However, consultation will not unnecessarily delay the issuance of a warning when a serious or continuing threat exists.

Timely Warnings will be distributed as soon as pertinent information is available and will contain information intended to assist members of the campus community in protecting themselves and preventing similar crimes.

Depending upon the circumstances, a Timely Warning may include:

- A brief description of the incident;
- The general location, date, and time of the incident;
- A description of the suspect or involved individual when appropriate and sufficiently specific;
- Information concerning any known or continuing threat;
- Recommended safety precautions;
- Crime prevention information;
- Instructions for reporting relevant information; and
- Contact information for Washington College Campus Police.

Timely Warnings will withhold the names and other identifying information of victims as confidential to the extent permitted by law and consistent with the College's obligations under the Clery Act.

Anyone with information concerning criminal activity or a situation that may present a serious or continuing threat to the Washington College community should immediately contact **Washington College Campus Police at 410-778-7810** or call **911** when emergency assistance is required.

EMERGENCY RESPONSE AND EVACUATION

What to Do in an Emergency

Washington College is committed to providing a safe environment for students, faculty, staff, and visitors. Emergencies can occur without warning, and every member of the campus community should know how to request assistance, receive emergency information, and take appropriate protective action.

During any emergency, remain aware of your surroundings, follow instructions from Washington College Campus Police and responding emergency personnel, and monitor official College communications for updates.

Call for Help

For any emergency situation requiring an **immediate campus police, fire, or emergency medical response, call 911**.

When speaking with a 911 dispatcher or campus police:

- Remain as calm as possible.
- Clearly state the nature of the emergency.
- Identify your location as **Washington College in Chestertown, Kent County, Maryland**.
- Provide the building name and specific location, if known.
- Provide your name and callback number when requested.
- Answer the dispatcher's questions and follow all instructions.
- Do not disconnect until instructed to do so, unless remaining on the phone would place you in danger.

For emergencies, suspicious activity, safety concerns, or other situations requiring assistance on campus, contact **Washington College Campus Police at 410-778-7810**.

If you are unsure whether a situation constitutes an emergency, do not hesitate to request assistance.

Report Emergencies and Suspicious Activity

Members of the Washington College community are encouraged to promptly report crimes, emergencies, suspicious activity, safety hazards, and concerning behavior.

Washington College Campus Police works collaboratively with allied local law enforcement, Fire, EMS, emergency management, and other public safety agencies when responding to incidents affecting the campus.

Examples of situations that should be immediately reported include:

- Crimes or suspected criminal activity;
- Fire or smoke;
- Medical emergencies;
- Suspicious persons, vehicles, packages, or activity;
- Threats or threatening behavior;
- Weapons;
- Hazardous material spills or gas leaks;
- Significant property damage;
- Dangerous conditions;
- Missing or endangered persons; and
- Any situation that may threaten the health or safety of the campus community.

If you see something concerning, say something. You are not expected to determine whether a crime or emergency has occurred before contacting Campus Police.

Emergency Communications

WAC Alerts

WAC Alerts is Washington College's primary emergency notification system.

The College uses WAC Alerts (OMNILERT) to quickly communicate information about significant emergencies, dangerous conditions, severe weather, and other situations requiring immediate action by the campus community.

Depending upon the circumstances and system capabilities, emergency notifications may be delivered through:

- SMS/text message;
- Voice notification;
- Email; and
- Other supported electronic communication methods.

Students, faculty, and staff are strongly encouraged to maintain accurate contact information within the WAC Alerts system and periodically verify their information.

Emergency messages may provide instructions to:

- Evacuate;
- Shelter in place;
- Lock down or secure an area;
- Avoid a specific location;
- Seek immediate shelter;
- Take weather-related precautions; or
- Follow other protective actions.

Read emergency messages completely and follow the instructions provided.

Information about WAC Alerts and account management is available through the Washington College Campus Police/Public Safety webpage.

Additional Emergency Information

During a significant emergency, Washington College may provide additional information through College email, the Washington College website, subsequent WAC Alerts, and other official communication methods.

If electronic communications are unavailable, the College may utilize physical notices, direct communication, or other available methods when circumstances permit.

Do not rely upon rumors or unverified social media posts during an emergency. Monitor official Washington College communications and instructions from Campus Police or emergency responders.

Personal Safety

Personal safety is a shared responsibility. Members of the Washington College community are encouraged to remain aware of their surroundings and take reasonable precautions.

General Safety Tips

- Be aware of your surroundings, especially when traveling alone or after dark.
- Whenever possible, walk with others in well-lit areas.
- Avoid distractions that significantly reduce your awareness of your surroundings.
- Keep your cell phone charged and readily accessible.
- Download and become familiar with the College's supported campus safety/emergency notification applications.
- Secure personal property and avoid leaving valuables unattended.
- Lock your vehicle and remove valuables from view.
- Trust your instincts. If something does not feel right, move to a safe location and contact Campus Police.
- Report suspicious persons, vehicles, or activity promptly.
- Know the locations of emergency exits in buildings you regularly use.
- Familiarize yourself with emergency procedures before an incident occurs.

If you feel unsafe traveling across campus because of a legitimate safety concern, contact **Washington College Campus Police at 410-778-7810** for assistance.

Residence Hall Safety

Students living in College housing play an important role in maintaining a secure residential environment.

Residents should:

- Lock residence hall room doors, including while sleeping.
- Never prop open exterior residence hall doors.
- Do not allow unknown individuals to follow you into secured buildings.
- Never loan your College identification/access card or keys to another person.
- Immediately report lost or stolen keys or access cards.
- Secure valuables, medications, electronics, and other personal property.
- Escort guests and follow College guest policies.
- Know the locations of emergency exits and evacuation routes.
- Become familiar with fire alarm pull stations and fire safety equipment.
- Immediately report damaged doors, locks, windows, lighting, or other security concerns.
- Report suspicious activity to Campus Police.

Students living off campus should also take appropriate precautions, including locking doors and windows, maintaining exterior lighting when possible, and becoming familiar with their surroundings.

Online, Technology, and Social Media Safety

Technology provides tremendous benefits but can also expose individuals to fraud, harassment, identity theft, stalking, and other criminal activity.

Members of the campus community should:

- Use strong, unique passwords and multi-factor authentication when available.
- Review privacy and security settings on social media accounts.
- Avoid publicly sharing sensitive personal information.
- Be cautious when communicating with unknown individuals online.
- Do not open suspicious links or attachments.

- Be cautious of unsolicited requests involving money, gift cards, account credentials, or personal information.
- Secure computers, tablets, and phones when not in use.
- Immediately report threatening electronic communications or credible threats of violence.

Threatening or suspicious communications involving potential criminal activity or immediate safety concerns should be reported to Washington College Campus Police.

Fire and Smoke Emergencies

Every member of the Washington College community should become familiar with evacuation routes and emergency exits in buildings where they live, work, attend class, or regularly visit.

When a fire alarm sounds, evacuate the building immediately. Never assume an alarm is only a drill.

If You Discover Fire or Smoke

If you discover fire or smoke:

1. **Alert others** in the immediate area.
2. **Activate the nearest fire alarm pull station** when safe to do so.
3. **Call 911** and provide the location and nature of the emergency.
4. **Evacuate immediately** using the nearest safe exit.
5. Close doors behind you when possible to help contain smoke and fire.
6. Do not use elevators during a fire emergency unless specifically directed by emergency personnel.
7. Move a safe distance away from the building.
8. Do not re-enter until authorized by the Fire Department, Campus Police, or other appropriate emergency personnel.

Only attempt to use a portable fire extinguisher if you have been trained, the fire is small and contained, you have a safe exit available, and doing so will not place you in danger.

Never allow a fire to come between you and your exit.

When You Hear a Fire Alarm

Immediately stop what you are doing and evacuate through the nearest safe exit.

Do not delay evacuation to retrieve personal belongings.

Faculty, staff, and students should encourage others to evacuate but should not place themselves in danger attempting to force another person to leave.

Once outside, remain clear of the building and emergency response areas. Do not return until authorized.

Medical Emergencies

For a serious or potentially life-threatening medical emergency, **call 911 immediately**.

Washington College Campus Police should also be notified at **410-778-7810** so officers can respond, assist emergency medical personnel, and help direct responders to the appropriate campus location. Kent County Dispatch will also dispatch Campus Police when you call 911 for an emergency.

While waiting for assistance:

- Remain with the individual when it is safe to do so.
- Follow instructions provided by emergency dispatchers.
- Provide first aid or CPR only within your level of training and ability.
- Do not unnecessarily move a seriously injured person unless remaining in place creates an immediate danger.
- Send someone to meet emergency responders when possible.
- Provide responding personnel with any relevant information you know.
-

Alcohol or Drug-Related Medical Emergencies

Alcohol poisoning and drug overdoses can be fatal. **Never assume that an unconscious or severely intoxicated person simply needs to "sleep it off."**

Call **Campus Police immediately** when an individual:

- Cannot be awakened or is difficult to wake;

- Has slow, irregular, shallow, or stopped breathing;
- Is vomiting while unconscious or semi-conscious;
- Appears confused, severely disoriented, or unresponsive;
- Has pale, bluish, gray, cold, or clammy skin;
- Experiences a seizure;
- May have consumed alcohol in combination with other drugs or medications;
- May have suffered a head injury; or
- Exhibits any other symptoms that cause concern for their immediate safety.

Stay with the person until emergency assistance arrives, unless doing so would place you in danger.

When in doubt, **call 911**.

Concerning or Threatening Behavior

Members of the Washington College community are encouraged to report behaviors or communications that raise concerns about the safety of an individual or others.

Concerning behavior may include:

- Direct or indirect threats of violence;
- Statements indicating an intention to harm oneself or another person;
- Significant threatening or intimidating behavior;
- Unexplained fixation on violence accompanied by other concerning behaviors;
- Possession or display of a weapon in violation of law or College policy;
- Escalating aggressive or violent behavior;
- Significant changes in behavior accompanied by threats or safety concerns; or
- Other conduct creating a reasonable concern for someone's immediate safety.

No single behavior automatically means that an individual presents a threat. Concerns should be evaluated based upon the totality of the circumstances.

For an immediate threat or emergency, call 911.

Non-emergency concerns may be reported to Washington College Campus Police, Student Affairs, Counseling Services, or other appropriate College resources.

Active Assailant or Active Threat

An active assailant or other violent threat is unpredictable and can develop rapidly. No written guidance can address every possible circumstance.

Washington College utilizes the **ALICE – Alert, Lockdown, Inform, Counter, Evacuate** options-based approach to help members of the campus community understand potential actions during an active threat.

Your response should be based upon the circumstances, your location, and the information available to you.

ALERT

Recognize the danger and communicate information as quickly as possible.

If it is safe to do so, call **911** and provide:

- Location of the threat;
- Number of assailants, if known;
- Physical description of the individual(s);
- Description of weapons, if known;
- Direction of travel;
- Number or location of potential victims; and
- Any other information requested by the dispatcher.

Do not place yourself in additional danger to obtain information.

LOCKDOWN

If evacuation is not a safe option:

- Enter a room or other securable location.
- Lock the door when possible.
- Barricade entry points using available furniture or other objects.
- Move away from doors and windows.
- Turn off lights when appropriate.
- Silence phones and electronic devices.
- Remain quiet.
- Position yourself behind substantial objects or available cover when possible.
- Do not open a secured area for unknown individuals.

INFORM

Real-time information can help others make informed decisions.

When safe to do so, communicate useful information through 911, Campus Police, or other authorized emergency communication channels.

Monitor official WAC Alerts and follow instructions from emergency personnel.

Avoid spreading unverified information.

COUNTER

If directly confronted by an attacker and evacuation or lockdown is no longer possible, actions intended to disrupt the attacker's ability to cause harm may become necessary as a **last resort**.

ALICE training discusses creating movement, distance, distraction, and other actions intended to reduce an attacker's ability to accurately target victims and create opportunities to escape.

Counter is **not a requirement to physically confront an attacker**. Individuals must make decisions based upon the immediate circumstances and their ability to act.

EVACUATE

When a safe opportunity exists, evacuation can place distance between you and the threat.

- Move away from the danger.
- Leave belongings behind.
- Encourage others to evacuate when possible, but do not allow another person's decision to prevent you from leaving.
- Keep your hands visible when approaching responding officers.
- Follow all law enforcement instructions.
- Do not attempt to enter or return to the affected area.
- Call 911 when you reach a safe location if authorities have not already been notified.

When Campus Police and Allied Law Enforcement Arrives

Responding officers' immediate priority is to locate and stop the threat.

Remain calm and:

- Follow officers' commands immediately.
- Keep your hands empty and visible.
- Avoid sudden movements toward officers.
- Do not stop officers to ask questions while they are responding to the threat.
- Provide useful information when requested.
- Understand that you may initially be directed, searched, or temporarily detained while officers determine what has occurred.

Additional rescue personnel will respond to assist injured individuals once conditions allow.

Severe Weather

Severe weather can develop quickly. Members of the campus community should monitor WAC Alerts and official weather information and follow instructions from College officials and emergency authorities.

Preparing for Severe Weather

Students and employees are encouraged to:

- Keep phones and electronic devices charged.
- Maintain access to a flashlight and batteries.
- Have drinking water and basic emergency supplies available.
- Monitor reliable weather information.
- Know where to seek shelter within buildings they regularly occupy.
- Avoid using candles or other open flames during power outages.

Tornado Watch

A **Tornado Watch** means conditions are favorable for tornadoes to develop in or near the watch area.

During a Tornado Watch:

- Remain weather aware.
- Monitor reliable weather information.
- Keep your phone charged and accessible.
- Review where you would seek shelter if a warning is issued.
- Be prepared to take immediate action if conditions worsen.

A Tornado Watch does not necessarily mean a tornado has formed.

Tornado Warning

A **Tornado Warning** means a tornado has been detected by radar or reported by trained observers and represents an immediate threat within the warned area.

Take protective action immediately.

If indoors:

- Move to a basement or lowest available level.
- If no basement is available, move to a small interior room or hallway on the lowest floor.
- Stay away from windows, doors, and exterior walls.
- Avoid large open areas such as gymnasiums, auditoriums, and other rooms with wide-span roofs.
- Get as low as possible.
- Protect your head and neck with your arms or available sturdy materials.
- Remain sheltered until the warning expires or authorities provide further instructions.

If outdoors:

- Seek shelter inside a substantial building immediately when possible.
- Do not remain in vehicles or exposed areas when safer shelter is available.
- If no substantial shelter is available, seek the safest available location and protect your head and neck.
- Follow instructions from emergency officials.

Power Outages

During a power outage:

- Remain calm.
- Use flashlights rather than candles or other open flames.
- Avoid elevators.

- Report hazardous conditions to Campus Police or Facilities.
- Unplug sensitive electronic equipment when appropriate to protect against power surges.
- Monitor WAC Alerts and other official College communications.
- Follow instructions concerning evacuation or relocation if issued.

A short-term power disruption may not require evacuation. If an extended outage affects campus operations or creates a safety concern, Washington College will provide additional instructions through available communication methods.

Be Prepared Before an Emergency

The best time to prepare for an emergency is **before one occurs**.

Washington College encourages every member of the campus community to:

- Maintain current information in WAC Alerts.
- Save **Washington College Campus Police: 410-778-7810** in their phone.
- Know when to call **911**.
- Learn at least two exits from buildings regularly used.
- Participate in ALICE and other emergency preparedness training.
- Take fire alarms and emergency notifications seriously.
- Keep phones and other essential devices charged.
- Report suspicious or concerning activity promptly.
- Become familiar with College emergency procedures.
- Follow instructions from Campus Police, Fire/EMS, and other emergency personnel.

Washington College Policy on Sexual Harassment and Discrimination

I. Policy Statement

Washington College complies with Title IX of the Educational Amendments of 1972 as well as the Title IX regulations released by the Department of Education on August 14, 2020. This policy prohibits all forms of sexual and gender-based harassment and discrimination. This policy also covers sexual misconduct that does not fall within the scope of the new federal regulations. This policy is effective December 15, 2021.

II. Scope of the Policy and Jurisdictional Statement

This policy applies to all students; student organizations; College employees and contractors, including staff, faculty, and administrators; and all other persons that participate in Washington College's educational programs and activities, including third-party visitors on campus. This policy prohibits the conduct set forth in Section VI (p. 5) regardless of the Complainant and Respondent's relationship status and whether the Complainant and Respondent are members of the same or opposite sex or gender.

Washington College may investigate any alleged violation of this Policy that occurs in the context of a College program, or activity (including academic, educational, extracurricular, study abroad and internships, and other College programs), or that otherwise affects the working, living, or learning environments, regardless of whether that conduct occurred on or off campus. Regardless of where the conduct occurred, the College will review complaints to determine whether the conduct occurred in the context of an employment or educational program or activity or has continuing effects on campus or in an off campus sponsored program or activity, or whether the College otherwise has a substantial interest in the allegations. A substantial interest includes:

Any action that constitutes a criminal offense as defined by law. (This includes, but is not limited to, single or repeat violations of any local, state, or federal law);

Any situation in which it is determined that the Respondent poses an immediate threat to the physical health or safety of any student or other individual;

Any situation that significantly impinges upon the rights, property, or achievements of oneself or others or significantly breaches the peace or causes social disorder; or

Any situation that is detrimental to the educational interests or mission of the College.

All actions by a student that involve the use of the College's computing and network resources from a remote location, including but not limited to accessing email accounts,

will be deemed to have occurred on campus. If the Respondent is unknown or is not
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otherwise subject to sanctions imposed by the College, the Title IX Coordinator will offer the Complainant supportive measures, remedies, and resources, such as, identifying appropriate campus and local resources and support options or, when criminal conduct is alleged, in contacting local or campus law enforcement if the individual would like to file a police report. Although the College may not, in certain instances, be in a position to conduct an investigation, it may provide appropriate resources or support to impacted individuals and where appropriate, the broader Washington College community.

III. Definitions

Confidential Resources: Confidential Resources are certain employees that are required by law to protect confidentiality when acting in the course of their professional duties. Under most circumstances, Confidential Resources will not share information with other individuals without the express consent of the reporting party. An exception may be made if there is an imminent risk of danger to the reporting party or another individual.

Complainant: When used in this policy, "Complainant" is the person who is alleged to have experienced Prohibited Conduct.

Formal Complaint: A Formal Complaint is a document signed by the Complainant or the Title IX Coordinator alleging a violation of this Policy against a Respondent and requesting that the College initiate an informal or Formal Resolution of the Formal Complaint pursuant to this Policy and its procedures. A Formal Complaint may be filed with the Title IX Coordinator in person, by mail, or by electronic mail as described in this section. For matters involving Title IX Prohibited Conduct, the Complainant must be participating or attempting to participate in the College's educational program or activities at the time of the filing of the Formal Complaint.

Mandated Reporter: Mandated Reporters are required to report allegations regarding conduct prohibited by this policy to the Title IX Coordinator. All employees of Washington College are mandated reporters except student employees. Resident Assistants are the only student employees who are considered mandated reporters.

Party or Parties: Refers to the Complainant and the Respondent, collectively.

Prohibited Conduct: Conduct prohibited by this Policy, as defined in Section VI (p. 5)

Respondent: When used in this policy, "Respondent" is the person who is alleged to have engaged in Prohibited Conduct. *Revised July 2026 3*

IV. Statement Regarding Privacy and Confidentiality

Washington College is committed to protecting the privacy of all individuals who are involved in a report of Prohibited Conduct. To the fullest extent practicable, consistent with fair and full investigation procedures, information related to a report of Prohibited Conduct will be shared only with those who "need to know" (i) to assist in the investigation or resolution of the report, or (ii) to allow the College to comply with other requirements under this Policy or state or federal law. Individuals who are involved in the review, investigation, or resolution of reports or Formal Complaints are trained to safeguard private information.

Complainants, Respondents, and any witnesses involved in a resolution process under this policy are strongly encouraged to exercise discretion in sharing information learned in such process in order to protect the privacy of the individuals involved, to safeguard the integrity of the process, and to avoid the appearance of retaliation.

Complainants and Respondents are not restricted from discussing the allegations set forth in a Formal Complaint.

The College prohibits parties from distributing documents obtained in the course of their participation in matters under this Policy's accompanying procedures, including, but not limited to, the Formal Complaint, interview summaries or transcripts, and the evidence file and investigative report, other than for the purpose of consulting with an advisor; incidental to seeking support and advice from family, clergy, health professionals, and others playing a similar role; or as part of a civil, criminal, or administrative legal proceeding.

As appropriate, in a given case, a College official, such as the Title IX Coordinator, may issue an order restricting the parties from disclosing specific information. Additionally, sharing private information in a manner that harms another individual may constitute retaliation prohibited under this Policy.

The College will provide other participants, such as witnesses, investigators, and hearing and appeal panel members, with instructions about respecting and safeguarding private information. Such persons are obliged to comply with the College's rules regarding privacy.

Students and employees who wish to obtain confidential assistance without making a report to the school may do so by contacting the Confidential Resources listed in Appendix D (p. 54). These resources will not share any personally identifiable information with other

College employees without express permission unless doing so is necessary to address a serious and ongoing threat to the campus community.

When the College receives a report or Formal Complaint of Prohibited Conduct, but the Complainant requests that their identity remain confidential or that the College not take
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action to address the conduct reported, the College must balance this request against its responsibility to provide a safe and non-discriminatory environment for all members of the campus community. The College will take all reasonable steps to investigate and respond to the report consistent with the Complainant's request, but its ability to do so may be limited. If the College determines that it cannot maintain Complainant's request for confidentiality, the College will inform the Complainant as soon as practicable and will take immediate and necessary action to protect and assist the Complainant. The Complainant will not be required to participate in any proceedings initiated by the College.

However, if Complainant declines to participate in an investigation or adjudication under this Policy and its Procedures, the College's ability to meaningfully respond to a report of Prohibited Conduct may be limited.

V. Title IX Coordinator

Washington College has designated the Title IX Coordinator, with the assistance of designated staff, to coordinate the College's compliance with Title IX and related provisions of the Clery Act (as amended by VAWA) and Maryland State Law. The Title IX Coordinator oversees compliance with all aspects of this Policy, including oversight of the College's response to all reports of Prohibited Conduct.

When used in this Policy, the term Title IX Coordinator may include an appropriate designee. The Title IX Coordinator's contact information is:

Gregory H. Krikorian

Hodson Hall, Student Affairs suite

300 Washington Ave., Chestertown, MD 21620

410-778-7752 or 717-344-1371- gkrikorian2@washcoll.edu or wctix@washcoll.edu

If you have any questions about this Policy, you may contact the College's Title IX Coordinator. The Title IX Coordinator acts with independence and authority free from bias and conflicts of interest. The Title IX Coordinator oversees all resolutions under this Policy

and related complaint resolution procedures. The Title IX Coordinator may delegate responsibilities under this policy to designated College staff or external professionals, who will have appropriate training or experience. Individuals tasked with aspects of implementation of this Policy and its Procedures are vetted and trained to ensure that in overseeing the institutional response to reports of Prohibited Conduct or the provision of *Revised July 2026 5*

supportive measures they do not act with bias for or against any party in a specific case, or for or against Complainants or Respondents, generally.

VI. Prohibited Conduct

The conduct prohibited by this Policy ("Prohibited Conduct") is set out below. The College will respond to all reports of Prohibited Conduct pursuant to the applicable Procedures set out in this Policy.

Conduct that does not meet the definitions below or that is not otherwise prohibited by this Policy may violate other College policies or may be considered inappropriate or unacceptable within the College community. In appropriate cases, the Title IX Coordinator may refer such conduct elsewhere within the College for resolution.

Title IX Sexual Harassment

Title IX Sexual Harassment is conduct on the basis of sex, occurring within the United States, which constitutes one or more of the following:

1. **Quid Pro Quo Sexual Harassment:** an employee of Washington College, conditions the provision of an aid, benefit, or service of the College, on an individual's participation in unwelcome sexual conduct; or

2. **Hostile Environment Sexual Harassment:** unwelcome conduct, determined by a reasonable person, to be so severe, and pervasive, and, objectively offensive, that it effectively denies a person equal access to the College's education program or activity.

Sexual Assault: Any sexual act directed against another individual, without the consent of that individual, including instances in which the individual is incapable of giving consent. **Non-Consensual Sexual Penetration (Rape, Sodomy)** Penetration, no matter how slight, of the vagina or anus of an individual with any body part or object, or oral penetration by a sex organ of another individual, without the consent of the individual or against the individual's will, or

not forcibly or against the individual's will in instances in which the individual is incapable of giving consent because of age or because of temporary or permanent mental or physical incapacity.

Non-Consensual Sexual Contact (sexual contact/fondling) The intentional touching of clothed or unclothed the private body parts of another individual (genitals, buttocks, groin, breasts), for the purpose of sexual gratification, forcibly, without the consent of

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the individual or against the individual's will, or the respondent caused the Complainant intentional touching of the Respondent clothed or unclothed genitals, buttocks, groin, breasts or other body parts without the consent of the complainant, for the purpose of sexual degradation, sexual gratification, or humiliation

not forcibly or against the individual's will in instances in which the individual is incapable of giving consent because of age or because of temporary or permanent mental or physical incapacity.

Incest: Non-forcible sexual intercourse, between persons who are related to each other, within the degrees wherein marriage is prohibited by Maryland law.

Statutory Rape: Non-forcible sexual intercourse, with a person who is under the statutory age of consent. The age of consent in Maryland is 16 years old.

4. **Dating Violence:** Violence, committed by a person, who is in or has been in a social relationship of a romantic or intimate nature with an individual. The existence of such a relationship shall be determined based on the Complainant's statement and with consideration of the length of the relationship, the type of relationship, and the frequency of interaction between the persons involved in the relationship. For the purposes of this definition, Dating Violence includes, but is not limited to, sexual or physical abuse or the threat of such abuse. Dating Violence does not include acts covered under the definition of Domestic Violence.

Unwelcomeness is subjective and determined by the Complainant (except when the Complainant is below the age of consent). Severity, pervasiveness, and objective offensiveness are evaluated based on the totality of the circumstances from the perspective of a reasonable person in the same or similar circumstances ("in the shoes of

the Complainant"), including the context in which the alleged incident occurred and any similar, previous patterns that may be evidenced.

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

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

1 **Stalking:** Engaging in a course of conduct, directed at a specific person, which would cause a reasonable person to fear for that person's safety, or the safety of others; or suffer substantial emotional distress. For the purposes of this definition:

2 Course of conduct means two or more acts, including, but not limited to, acts in which the Respondent directly, indirectly, or through third parties, by any action, method, device, or means, follows, monitors, observes, surveils, threatens, or communicates to or about a person, or interferes with a person's property.

3 Reasonable person means a reasonable person under similar circumstances and with similar identities to the Complainant.

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

Additional Requirements

Conduct must also meet the following additional requirements to fall within the definition of Title IX Sexual Harassment:

- It must occur within the United States; and
- It must occur within the scope of the College's educational program or activities; and

- It must occur on or after August 14, 2020

Prohibited Conduct occurs within the scope of Washington College's education programs or activities when:

1. It occurs on campus;

2. It occurs on a property or in any facility owned and controlled by the College;

3. It occurs as part of the College's operations;

4. The College exercised substantial control over the Respondent;

5. It occurs in a building owned or controlled by a student organization that is officially recognized by the College.

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As described in Section X (p. 20) of this Policy, if conduct alleged in a Formal Complaint does not meet the definition of Title IX Sexual Harassment, the College must dismiss the Formal Complaint (or the allegations of Title IX Sexual Harassment in the Formal Complaint) for purposes of compliance with Title IX. If the conduct would still, as alleged, constitute Non-Title IX Prohibited Conduct under this Policy, the College may continue to address the allegations pursuant to the Procedures in this Policy set forth in Appendix B or C.

1. Non-Title IX Prohibited Conduct

In addition to the conduct set forth above as Title IX Sexual Harassment, the following conduct is also prohibited under this Policy:

. Non-Title IX Sexual Harassment

Non-Title IX Sexual Harassment includes conduct that meets the definition of Title IX Sexual Harassment but does not occur within the United States or within Washington College's educational program or activities (e.g., sexual harassment occurs on a school trip outside of the United States).

Non-Title IX Sexual Harassment also includes conduct that does not meet the definition of Title IX Sexual Harassment but otherwise constitutes an unwelcome sexual advance, a request for sexual favors, or other unwanted conduct of a sexual nature, whether verbal, non-verbal, graphic, physical, or otherwise when the conditions outlined in (i) or (ii) below

are present; or unwelcome conduct based on sex, gender, sexual orientation, gender identity, or gender expression, which may include acts of aggression, intimidation, or

hostility, whether verbal, non-verbal, graphic, physical, or otherwise when the conditions outlined in (i) or (ii) below are present;

i Submission to or rejection of such conduct is made, either explicitly or implicitly, a term or condition of a person's employment, academic standing, or participation in any College program or activity or is used as the basis of College decisions affecting the individual; or

ii Such conduct creates a hostile environment. A "hostile environment" exists when the conduct is sufficiently severe, persistent, or pervasive that it unreasonably interferes with, limits, or deprives an individual from participating in or benefiting from the College's education or employment programs or activities. Conduct must be deemed severe, persistent, or pervasive from both a subjective and objective perspective. In evaluating

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i whether a hostile environment exists, the College will consider the totality of known circumstances, including, but not limited to:

ii The frequency, nature, and severity of the conduct;

iii Whether the conduct was physically threatening;

iv The effect of the conduct on the Complainant's mental or emotional state;

v Whether the conduct arose in the context of the discriminatory conduct;

vi Whether the conduct unreasonably interfered with the Complainant's educational or work performance or College programs or activities; and

vii Whether the conduct is protected by academic freedom or freedom of speech.

A hostile environment can be created by persistent or pervasive conduct or by a single or isolated incident, if sufficiently severe. The more severe the conduct, the less need there is to show a repetitive series of incidents to prove a hostile environment.

Non-Title IX Sexual Assault: Non-Title IX Sexual Assault includes conduct that meets the definition of Title IX Sexual Assault but does not occur within the United States or within the College's educational program or activities.

Non-Title IX Dating Violence: Non-Title IX Dating Violence includes conduct that meets the definition of Title IX Dating Violence but does not occur within the United States or within the College's educational program or activities.

Non-Title IX Domestic Violence: Non-Title IX Domestic Violence includes conduct that meets the definition of Title IX Domestic Violence but does not occur within the United States or within the College's educational program or activities.

Non-Title IX Stalking: Non-Title IX Stalking includes conduct that meets the definition of Title IX Stalking but does not occur within the United States or within the College's educational program or activities.

Sexual Exploitation: Sexual Exploitation is intentionally engaging in any of the following:

Observing another person when that person is nude or engaged in sexual activity without the knowledge and consent of the person observed or

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allowing another to observe consensual sexual activity without the knowledge and consent of all parties involved;

ii. Making, sharing, posting, streaming or otherwise distributing any image, photography, video, or audio recording depicting or otherwise recording another person when that person is nude or engaged in sexual activity without the knowledge and consent of the person depicted or recorded;

iii. Exposing one's genitals to another person without the consent of that person;

iv. Exposing another person to a sexually transmitted infection without the knowledge and consent of the person exposed; and
v. Causing another person to become incapacitated with the intent of making that person vulnerable to nonconsensual sexual assault or sexual exploitation

g. **Aiding or Facilitating:** Knowingly and intentionally aiding or facilitating any act of sexual misconduct, before or after the fact, is a violation of this policy.

h. **Retaliation:** Retaliation is adverse action taken against an individual with the purpose of interfering with an individual's rights under these procedures, including for making a good faith report of prohibited conduct, for participating in an investigation, proceeding, or hearing, or for refusing to participate in an investigation, proceeding, or hearing under these procedures. Retaliation may include intimidation, threats, coercion, discrimination, or adverse employment or educational actions. Retaliation may be found even when an underlying report made in good faith was not substantiated. Retaliation may be committed

by the Respondent, the Complainant, or any other individual or group of individuals. Retaliation does not include good faith actions pursued in response to a report of prohibited conduct.

i. **False or Bad Faith Allegations:** An individual found to have knowingly made a false complaint or report, or to have knowingly given false information during a process under this Policy, may be subject to disciplinary action, up to and including termination of employment or dismissal from the College's academic programs.

1. Affirmative Consent, Coercion, Force, and Incapacitation

. Affirmative Consent

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Sexual contact must be consensual at all times, and sexual contact is considered consensual only after affirmative consent has been given. Affirmative consent is a knowing, voluntary, and mutual decision among all participants to engage in sexual activity. Consent can be given by words or actions, as long as those words or actions create clear permission regarding willingness to engage in sexual activity.

Silence or lack of resistance, in and of itself, does not demonstrate consent. The definition of consent does not vary based upon a participant's sex, sexual orientation, gender identity, or gender expression. A complaint is NOT considered to have been made in bad faith simply because it is not corroborated or because a finding of responsibility cannot be reached under policy.

The following are principles that apply to the above definition of affirmative consent:

- Consent to any sexual act or prior consensual sexual activity does not necessarily constitute consent to any other sexual act.
- Consent is required regardless of whether the person initiating the act is under the influence of drugs or alcohol.
- Consent may be withdrawn at any time.
- When affirmative consent is withdrawn or can no longer be given, sexual activity must stop.

- A person is incapable of affirmative consent when they are: ▪ Less than seventeen years of age; and/or
- ▪ Mentally disabled (a person is mentally disabled when their normal cognitive, emotional, or behavioral functioning renders them incapable of appraising their conduct); or incapacitated.
- Consent cannot be given when it is the result of any coercion, intimidation, force, or threat of harm.
- Force

Force is the use of physical violence and/or physical imposition to gain sexual access. Force also includes threats and intimidation (implied threats) that is intended to overcome resistance or produce consent (e.g., "Have sex with me or I'll hit you," "Okay, don't hit me, I'll do what you want."). Sexual activity that is forced is, by definition, non-consensual, but non-consensual sexual activity is not necessarily forced. Silence or the absence of resistance alone is not consent. Consent is not demonstrated by the absence of

resistance. While resistance is not required or necessary, it is a clear demonstration of non-consent. *Revised July 2026 12*

- Coercion

Coercion is intimidation or conduct that would compel an individual to do something against their will by:

- expressed or implied threats of physical, emotional, property, or reputational harm, or
- pressure that would cause a reasonable person to fear such harm.

Coercion is more than an effort to persuade or attract another person to engage in sexual activity. In assessing whether coercion was used, the frequency, duration, and intensity of the pressure applied will be taken into consideration.

- Incapacitation

A person cannot consent if they are unable to understand what is happening or disorientated, helpless, asleep, or unconscious, for any reason, including by alcohol or

other drugs. As stated above, a Respondent violates this policy if they engage in sexual activity with someone who is incapable of giving consent.

i Incapacitation negates consent. An individual cannot give consent when mentally or physically incapacitated, when the incapacity is known or based on the circumstances should reasonably have been known to be incapacitated.

ii Incapacitation occurs when someone 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, or how" of their sexual interaction).

iii Incapacitation is determined through consideration of all relevant indicators of an individual's state and is not synonymous with intoxication, impairment, blackout, and/or being drunk.

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

VII. Campus and Community Resources

1. Overview of Resources and Disclosures

Washington College is committed to treating all individuals with dignity, care, and respect. Both Complainants and Respondents have equal access to support and counseling services through the College. All parties are encouraged to utilize on-campus or off-
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campus resources for assistance. For a comprehensive list of resources, see Appendix D (p. 54) of this policy.

Any individual who has been the victim of a crime is encouraged to get to a safe place and to call 911 or to contact local law enforcement, immediately.

Washington College recognizes that not every individual will choose to report conduct prohibited by this Policy to the College or to law enforcement. Accordingly, Confidential Resources are available to all students and employees. Confidential Resources can provide critical support and information and can assist individuals in evaluating whether to make a report to the College or to law enforcement. Confidential Resources are listed in Appendix D (p. 54).

As set forth in Appendix D (p. 54), the staff at Health and Counseling Services are Washington College's designated Confidential Resources. Confidential Resources are certain employees that are required by law to protect confidentiality when acting in the course of their professional duties. Under most circumstances, Confidential Resources will not share information with other individuals without the express consent of the reporting party. An exception may be made if there is an imminent risk of danger to the reporting party or another individual or where required by law, such as in the case of reporting abuse of a minor or vulnerable adult.

All other employees of the College are mandated reporters and have an obligation to share any reports of conduct prohibited by this Policy with the Title IX Coordinator.

Medical Care After a Sexual Assault

Any person who experiences sexual assault or violence is encouraged to immediately seek medical assistance. Seeking medical care does not result in a report to law enforcement or to the College. In the aftermath of sexual assault or violence, medical providers can facilitate or provide the following:

- Treatment of any injury or physical trauma
- HIV and STI testing
- Pregnancy testing
- Advice on health care concerns related to the incident
- Collection and preservation of evidence as a part of a sexual assault forensic exam for potential use in criminal prosecution.
- Transportation will be provided to an area hospital equipped with SAFE kits.

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On-Campus Resources include:

Health Services, (410) 778-7261

Off-Campus Resources include:

- FOR ALL SEASONS: Behavioral Health & Rape Crisis Center (410) 822-1018
- University of Maryland Shore Medical Center at Chestertown (410) 778-3300

- University of Maryland Shore Medical Center at Easton (410) 822-1000
- For more information about sexual assault forensic examinations, visit RAINN's webpage, call RAINN's 24-hour National Sexual Assault Hotline: (800) 656-HOPE, or chat online at online.rainn.org.

VIII. Making a Report Under This Policy

1. Reporting Guidelines

All members of the Washington College community are encouraged to report information about any form of conduct potentially prohibited by this Policy involving a student or an employee. The College will respond to all reports of Prohibited Conduct, including

contacting the Complainant to discuss the availability of supportive measures, resources for support, and options for resolution.

At the time a report of Prohibited Conduct is made, a Complainant does not have to decide whether to pursue resolution of the report through any particular resolution process. Choosing to make a report and deciding how to proceed can be a process that unfolds over time. Although the College may need to take action as a result of a particular report, the College will endeavor to respect a Complainant's wishes in making the decision that is best for them and will provide support to assist each individual in making that decision. Because the conduct prohibited by this Policy often involves behaviors or interactions that are not witnessed by third parties, reports cannot always be substantiated by additional direct evidence. Lack of corroborating direct evidence should not discourage a person from reporting an experience of Prohibited Conduct.

Individuals may make a report of Prohibited Conduct by filling out a CARE Report, by emailing the Title IX Coordinator (**wctix@washcoll.edu**) or by contacting the following College employees:

Assistant Title IX Coordinators

Alex Calder, Head Field Hockey Coach

443-791-8010 | acalder2@washcoll.edu | Cain Athletic Center, 1st floor

Ryan Colman, Chief of Campus Police/ Executive Director of Public Safety

410-778-7810 | rcolman2@washcoll.edu | Cullen Hall (lower level)

Will De Reza, Web Administrator, Marketing & Communications

845-475-5344 | wdereza2@washcoll.edu | East Hall, 2nd Floor, Room 203

Carrie Reiling, Associate Professor, Political Science & International Studies
410-810-5884 creiling2@washcoll.edu | Cromwell Hall, Office 207

1. Mandated Reporters

All College employees are Mandated Reporters, except student employees. Resident Assistants are the only student employees who are Mandated Reporters. When Mandated Reporters become aware of an alleged incident of sexual harassment (which includes sexual assault, dating violence, domestic violence, and stalking) or other conduct prohibited by this Policy, that involves a student as either the Complainant or Respondent, they are always obligated to report the information they have to the Title IX Coordinator.

Mandated Reporters should be prepared to report the name, date, time, location, and description of the incident (if known). They are otherwise required to maintain an individual's privacy to the greatest extent possible.

When the Title IX Coordinator receives a report of Prohibited Conduct, they will contact the Complainant, if known, or another individual reporting the Prohibited Conduct to offer resources and supportive measures. The individual will also be advised of the option to pursue a Formal Complaint, if such an option is available, and any other available reporting options and resources.

Any Mandated Reporter who receives a report should not, under any circumstances, attempt to resolve the report without first reporting it to the Title IX Coordinator. Such failure to report may subject the individual to disciplinary sanctions.

1. Time Frame for Reporting

There is no time limitation on reporting or filing a Formal Complaint of Prohibited Conduct to the Title IX Coordinator. However, if the Respondent is no longer subject to the College's jurisdiction or significant time has passed, the ability to investigate, respond, and provide remedies may be more limited or impossible.

Acting on reports and Formal Complaints significantly impacted by the passage of time (including, but not limited to, acts that have been impacted by the rescission or revision of

policy) is at the discretion of the Title IX Coordinator, who may document allegations for *Revised July 2026 16*

future reference, offer supportive measures or remedies, or engage in informal or formal action, as appropriate.

When a Formal Complaint is filed after a significant delay the College will apply the Policy in place at the time of the alleged Prohibited Conduct and the Procedures in place at the time the report was made.

1. Anonymous Reporting

Individuals may submit reports of Prohibited Conduct anonymously. An individual may make a report without disclosing their name, identifying the Respondent, or requesting action. Depending on the level of information included about the conduct or the individuals involved, anonymous reporting may reduce the College's ability to respond or take appropriate action. Moreover, the College will generally not be able to take disciplinary action against an individual based solely on an anonymous report.

1. Public Awareness and Advocacy Events

Public awareness or advocacy events at which community members disclose incidents of Prohibited Conduct do not initiate the College's Title IX obligations, including its obligation to investigate reports of Prohibited Conduct. Such events may, however, inform the need for campus-wide educational and prevention efforts, and the College may implement broad community initiatives in response to such events where appropriate.

1. Response to Reports of Prohibited Conduct

Upon receipt of a report of Prohibited Conduct, the Title IX Coordinator will provide Complainant with an explanation of their rights under this Policy, the process for filing a Formal Complaint, and an overview of their options for resolution of the Formal Complaint and the Procedures associated with each resolution process. The Complainant will also be informed of the range of possible outcomes of the resolution process, including potential remedial actions and possible disciplinary actions that may be taken against the Respondent upon finding a violation of this Policy. The Complainant will also be advised of their right to request that the College refrain from initiating a resolution process and of their right to file a report with Campus Police from the Washington College Department of Public Safety and state and local law enforcement.

The Complainant will be informed of the availability of supportive measures regardless of whether Complainant files a Formal Complaint. The Title IX Coordinator will consider the Complainant's requests for supportive measures in accordance with Section IX (p. 18) of this Policy. *Revised July 2026 17*

1. Advisors

The Complaint and Respondent have the right to have an advisor of their choosing present with them at all stages under this Policy and its Procedures. The advisor may be any person, including an attorney. The parties may be accompanied by their respective advisor at any meeting or proceeding related to the investigation or resolution of a report under this Policy. While the advisor may provide support and advice to the parties at any meeting or proceeding, the College may establish restrictions regarding the extent to which the

advisor may participate in the proceedings. Advisors may not speak on behalf of the parties or otherwise participate in, or in any manner delay, disrupt, or interfere with meetings or proceedings, with the exception that a party's advisor participating in a hearing under Appendix A (p. 31) will ask questions of the other party and witnesses.

An advisor should plan to make themselves reasonably available, and the College will not unduly delay the scheduling of meetings or proceedings based on the advisor's unavailability.

If an advisor fails to comply with the Procedures set forth herein or established rules of decorum, the College reserves the right to exclude the advisor from further participation in the process. The Title IX Coordinator is responsible for interpreting and applying this provision.

In sexual misconduct cases involving students only, the Complainant and the Respondent may have no more than two people (i.e., a personal supporter, an attorney, a trained advocate, or an advocate supervised by an attorney) at any hearing, meeting, or interview during the investigation and hearing process. Support persons should not also be witnesses to the matter. The support person, advisor, and attorney are permitted to be present and to provide private advice and counsel to the student only, but is not permitted to participate in hearings, meetings, or interviews directly (for instance, the advisor is not permitted to address the investigators or hearing panelists). Disruptive supporters, attorneys, or advisors may be removed and prohibited from further participation in the investigation and hearing process. Student Complainants and Respondents may access attorneys paid for by the Maryland Higher Education Commission (MHEC) or who agree to participate on a pro bono (without charge) basis. Information regarding accessing counsel

through MHEC can be found on the MHEC website at (https://mhec.maryland.gov/Pages/Title-IX-Campus-Sexual-Assault-Proceedings.aspx). Students may knowingly and voluntarily choose not to have counsel. *Revised July 2026 18*

1. Amnesty for Drug and Alcohol Use

The health and safety of every student and employee at Washington College is of utmost importance. The College recognizes that students or employees who have been drinking or using drugs (whether such use is voluntary or involuntary) in violation of other College policies may be hesitant to report incidents due to fear of potential consequences for their own conduct. The College strongly encourages individuals to report such Prohibited Conduct. A Complainant, bystander, or other individual who in good faith reports Prohibited Conduct under this Policy to a College official or law enforcement shall be covered under the College's Medical Amnesty Policy as outlined in the Student Handbook.

1. Coordination with Law Enforcement

Washington College strongly encourages Complainants to pursue criminal action for incidents of sexual harassment, sexual violence, and dating and domestic violence, and stalking that may also be crimes under Maryland law. The College will assist a Complainant in making a criminal report and will cooperate with law enforcement agencies if a Complainant decides to pursue criminal action to the extent permitted by law.

Neither law enforcement's determination whether or not to prosecute a Respondent, nor the outcome of any criminal prosecution, are determinative of whether a violation of this Policy has occurred.

Proceedings under this Policy may be carried out prior to, simultaneously with, or following civil or criminal proceedings. The College may not delay conducting its own investigation unless specifically requested by the law enforcement to do so.

In the event of such a specific request, the College will defer its investigation only during the time that law enforcement is gathering evidence, which should not exceed ten days absent extenuating circumstances. The College will nevertheless communicate with the Complainant and Respondent (if appropriate) regarding Title IX rights, procedural options, and the implementation of supportive measures to assure their safety and well-being. The College will promptly resume fact-gathering as soon as it is informed that law enforcement has completed its initial investigation.

IX. Supportive Measures

Washington College will offer and implement appropriate and reasonable supportive measures to the parties upon notice of alleged harassment, discrimination, or retaliation.

Supportive measures are non-disciplinary, non- punitive individualized services offered as appropriate, as reasonably available, and without fee or charge to the parties to restore or preserve access to the College's education program or activity, including measures
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designed to protect the safety of all parties or the College's educational environment, or deter harassment, discrimination, or retaliation.

The Title IX Coordinator promptly makes supportive measures available to the parties upon receiving notice of a report or a Formal Complaint. At the time that supportive measures are offered, the College will inform the Complainant, in writing, that they may file a Formal Complaint with the College either at that time or in the future, if they have not done so already. The Title IX Coordinator works with the Complainant and Respondent to ensure that their wishes are taken into account with respect to the supportive measures that are offered. The College will maintain the privacy of the supportive measures, provided that privacy does not impair its ability to provide the supportive measures. The College will act to ensure as minimal an academic impact on the parties as possible. The College will implement measures in a way that does not unreasonably burden the other party.

Supportive measures may include, but are not limited to:

- Referral to counseling, medical, or other healthcare services
- Referral to the Employee Assistance Program
- Referral to community-based service providers
- Visa and immigration assistance
- Student financial aid counseling
- Education to the community or community subgroup(s)
- Altering campus housing assignment(s)
- Altering work arrangements for employees or student employees
- Safety planning

- Providing campus safety escorts
- Providing transportation accommodation
- Implementing contact limitations (no contact directives) between the parties2
- Academic support, extensions of deadlines, or other course/program-related adjustments
- Class schedule modifications, withdrawals, or leaves of absence
- Increased security and monitoring of certain areas of the campus

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- Any other actions deemed appropriate by the Title IX Coordinator

Review of Supportive Measures

Upon request, a Complainant or Respondent will be afforded a reasonable and prompt review of any supportive measure that directly affects them and will be permitted to submit evidence in support of any changes requested.

Emergency Removal

If after undertaking an individualized safety and risk analysis, the Title IX Coordinator, in consultation with the Vice President for Student Affairs or designee determines that the Respondent poses an immediate threat to the physical health or safety of any student or other individual in the College community, the College may remove the Respondent on an emergency basis. The length and nature of the removal will depend on the facts of the case. The College will notify the Respondent of the emergency removal. Both the Complainant and the Respondent will have an opportunity to challenge the decision and its terms, including by submitting evidence, immediately following the removal to the Vice President for Student Affairs or designee.

Administrative Leave

The College may place a non-student employee Respondent on administrative leave, consistent with the Employee Information Guide, during the pendency of a Formal Resolution process conducted pursuant to this Policy and its procedures.

X. Resolution Process

Options for Report Resolution Support-based Resolution

Reports of Prohibited Conduct are generally resolved either through a support-based resolution of a report of Prohibited Conduct, an informal resolution of a Formal Complaint, or a Formal Resolution of a Formal Complaint.

When the Title IX Coordinator receives any report of Prohibited Conduct, the Title IX Coordinator will initiate an inquiry into the allegations. Information learned during the initial inquiry will inform the Title IX Coordinator's determination regarding the provision of supportive measures to the parties and appropriate resolution processes.

A Support-based Resolution of a report of Prohibited Conduct occurs when the report does not result in the filing of a Formal Complaint. Support-based resolutions will include the offering and provision of supportive measures intended to restore equal access to the

Formal Complaints

College's educational programs and activities and to preserve a safe and non-discriminatory environment for living, working, and learning.

A Formal Complaint is a document signed by the Complainant or the Title IX Coordinator alleging a violation of this Policy against a Respondent and requesting that the College initiate an informal or Formal Resolution of the Formal Complaint pursuant to this Policy

and its Procedures. A Formal Complaint may be filed with the Title IX Coordinator in person, by mail, or by electronic mail. For matters involving Title IX Prohibited Conduct, the Complainant must be participating or attempting to participate in the College's educational program or activities at the time of the filing of the Formal Complaint.

If the Complainant chooses not to file a Formal Complaint, the Title IX Coordinator has discretion to file a Formal Complaint. Where the Title IX Coordinator determines that the College cannot honor the Complainant's request that no Formal Complaint be pursued under this Policy, the Title IX Coordinator will promptly initiate the resolution process by making a signed, written Formal Complaint on behalf of the College. In determining whether to file a Formal Complaint, the Title IX Coordinator will consider the following:

- Whether the Respondent has a history of violent behavior or is a repeat offender;

- Whether the incident represents escalation in unlawful conduct by the Respondent from previously noted behavior;
- The increased risk that the Respondent will commit additional acts of violence;
- Whether the Respondent used a weapon or force;
- Whether the Complainant is a minor;
- Whether the College possesses other means to obtain evidence such as security footage; and
- Whether available information reveals a pattern of perpetration at a given location or by a particular group.

If the Title IX Coordinator decides to file a Formal Complaint, The Title IX Coordinator will notify the Complainant of the College's intention to proceed with a Formal Complaint and will take immediate action as necessary to protect and assist the Complainant. The Title IX Coordinator will make reasonable efforts to protect the privacy of the Complainant. However, typically, the Complainant's identity would have to be disclosed as part of the College's investigation. The Complainant is not required to participate in any proceedings

that follow. However, if the Complainant declines to participate in an investigation or the adjudicative process under this Policy and its Procedures, the College's ability to investigate meaningfully and respond to a report of prohibited conduct may be limited.

- Consolidation of Formal Complaints

The Title IX Coordinator has the discretion to consolidate multiple reports into a single investigation if evidence relevant to one incident might be relevant to the others. Consolidation might involve multiple Complainants and a single Respondent, multiple Respondents, or conduct that is temporally or logically connected. In the event that the allegations under this Policy involve allegations of a violation of a separate policy, the College will have the right, within its sole discretion, to consolidate those other allegations within one investigation or hearing under this Policy and its accompanying Procedures.

- Dismissal of Formal Complaints

After the filing of the Formal Complaint, or during the initial inquiry, investigation, or resolution process, it may become apparent that conduct alleged in a Formal Complaint

does not meet the definition of Title IX Sexual Harassment as defined in Section VI (p. 5) of this Policy. In that case, in accordance with Title IX, the Title IX Coordinator must dismiss the Formal Complaint (or the allegations of Title IX Sexual Harassment, therein). If the conduct would still, as alleged, constitute Non-Title IX Prohibited Conduct as defined in Section VI (p. 8) of this Policy, the College will continue to address the allegations pursuant to this Policy and the resolution procedures set forth in Appendices B or C. If the conduct, as alleged, does not constitute a violation of this Policy, the Formal Complaint will be dismissed in its entirety. If the conduct, as alleged, violates another College policy, the Title IX Coordinator must transfer the matter, and all information related to it, to the appropriate College office for assessment and potential further action.

The Title IX Coordinator may dismiss a Formal Complaint and close a case where:

- there is no jurisdiction under these procedures;
- the facts set forth in the Formal Complaint do not constitute prohibited conduct under these procedures;
- the Complainant fails or refuses to cooperate with the investigation such that the investigator is unable to investigate despite reasonable

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- measures, including where the Complainant cannot be located, the Complainant fails or refuses to be available for interviews or meetings, or the Complainant fails to provide necessary information;
- the Complainant notifies the Title IX Coordinator in writing that they would like to withdraw the Formal Complaint or any allegations therein, prior to resolution;
- the Respondent is no longer enrolled in, or employed by, the College; or

specific circumstances prevent the College from gathering evidence sufficient to reach a determination as to the Formal Complaint or allegations therein. Notice of Allegations

Upon any dismissal, the Title IX Coordinator will promptly send written notice of the dismissal and the rationale for doing so simultaneously to the parties. The parties may appeal the dismissal of the Formal Complaint on any of the bases and pursuant to the procedures set forth in Section XII (p. 28) Appeals, below.

At the issuance of a Formal Complaint, the Title IX Coordinator will notify the Complainant and the Respondent, in writing, of the filing of the Formal Complaint and commencement of resolution process pursuant to this Policy and its Procedures and will provide both parties with a copy of the Formal Complaint. Such notice will:

- identify the Complainant and the Respondent;
- specify the alleged prohibited conduct and its date, time, and location, to the extent known;
- specify the basis for jurisdiction over the Formal Complaint;
- specify the factual allegations pertaining to the prohibited conduct;
- specify any sanctions that may be imposed, including the College's transcript notation policy;
- specify which procedures will be used to resolve the Formal Complaint
- identify the investigator(s) or the facilitator of informal resolution;
- include information about the parties' respective rights and obligations under this Policy and the applicable procedures;

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- inform the parties of their right to have an advisor of choice at all stages of the resolution process, who may accompany the respective parties to meetings and proceedings;
- inform the parties of the range of available resources, including mental health and academic support resources;
- explain the prohibition against retaliation; and

instruct the parties to preserve any potentially relevant evidence, whatever its form. Informal Resolution If, at any point prior to the resolution of the Formal Complaint, the Title IX Coordinator determines that there are additional allegations of Prohibited Conduct not included in the original notice that should be investigated, the Title IX Coordinator must provide the parties with an amended notice of additional allegations.

At any time after a Formal Complaint has been filed and before a hearing commences, the parties may seek to resolve a report of prohibited conduct through Informal Resolution, an administrative process.

Participation in Informal Resolution is entirely voluntary; the Title IX Coordinator will neither pressure nor compel either party to participate in the process or to agree to any specific terms. In every case, the Title IX Coordinator has discretion to determine whether the matter is appropriate for Informal Resolution and to determine the appropriate terms.

Before the Title IX Coordinator approves the Informal Resolution process or the terms of any Informal Resolution, the Title IX Coordinator will determine that they have sufficient information about the matter to make these decisions. The parties are strongly encouraged, although not required, to consult with their advisors during the Informal Resolution process.

If the process is terminated for any reason, the matter will be re-evaluated for resolution pursuant to the Formal Complaint resolution process under this Policy and its Procedures. For this reason, the investigator will not participate in Informal Resolution. The Title IX Coordinator will oversee the Informal Resolution process and have access to all College records in the matter, including any records or reports prepared during an investigation.

The Title IX Coordinator will consult separately with both parties and recommend to the parties the terms of a potential Informal Resolution agreement. Such terms may include,

but are not limited to, any sanctions or remedies that could be imposed as a result of a finding following a hearing under these proceedings. *Revised July 2026 25*

Restorative Agreement

Both parties must agree to the terms before an Informal Resolution agreement becomes effective. At any time before a written agreement is effective, the Complainant or the Respondent may withdraw from the Informal Resolution process, and the Title IX Coordinator may also, at their discretion, terminate the process.

If both parties are satisfied with the Title IX Coordinator's recommendation, the matter will be resolved with a written agreement. The Title IX Coordinator will provide each party, separately, with a copy of the proposed agreement for the party to review, sign, and return. If both parties return the signed written agreement to the Title IX Coordinator the terms of the agreement will become effective, and the Title IX Coordinator will promptly notify both parties in writing that the agreement is final. Once the agreement is effective, the parties may not appeal the agreement, and the Complainant may not seek to refile the Formal Complaint absent new allegations of misconduct. The parties are expected to honor and comply with the terms of the Informal Resolution. Noncompliance may be subject to proceedings under the other College policies.

If the process is terminated and the matter is resolved pursuant to the Formal Resolution process, neither the Title IX Coordinator nor the parties will disclose to the Investigator, Decision-maker, or Appellate reviewers either the fact that the parties had participated in the Informal Resolution process or any information learned during the process.

While the parties are exploring Informal Resolution, any pending investigation will pause, and the time spent pursuing resolution in this way will not count toward the investigation time limit.

Informal Resolution typically takes two forms: (1) Restorative Agreements, or (2) Negotiated Agreements. Other forms of informal resolution may be available in the discretion of the Title IX Coordinator, in agreement with both parties. Informal resolution is NOT available to resolve complaints alleging sexual assault or sexual coercion.

The purpose of a Restorative Agreement is for the parties to identify and agree on a set of remedies. Upon successful completion of those remedies, the Formal Complaint will be resolved and may not be refiled. Such remedies may include:

- Impact Letter;
- Apology Letter;
- Directed Study;
- Reflection Paper; or

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Other forms of restorative actions Negotiated Agreement

Formal Resolutions

No Contact Directives

Evidentiary Standard and Burden of Proof

As a necessary precondition of a Negotiated Resolution, the Respondent must accept responsibility for all or part of the alleged prohibited conduct. The parties will then have an opportunity to negotiate with the Title IX Coordinator regarding what they believe the appropriate sanction should be. In support of their position, parties are encouraged to submit impact/mitigation information they believe the Title IX Coordinator should consider in evaluating any sanction.

The Title IX Coordinator has the discretion to propose other terms for the resolution that may be appropriate to address the prohibited conduct for which the Respondent has accepted responsibility.

If the Respondent agrees to a Negotiated Agreement under Informal Resolution that provides for a suspension, withdrawal, or dismissal (i.e., expulsion) from the College, there will be a transcript notation consistent with the College's policy.

The Formal Resolution process is guided by provisions of this section of this Policy and by the Procedures accompanying this Policy. The applicable procedure is determined by the type of prohibited conduct alleged (Title IX Sexual Harassment or Non-Title IX Prohibited Conduct) and the identity of the Respondent. Upon receipt of a report or a Formal Complaint, the Title IX Coordinator will determine which procedure applies.

The Formal Resolution process is overseen by the Title IX Coordinator and will be conducted in a prompt and equitable manner, pursuant to the time frames set forth in Section XIII (p. 29). Throughout the Formal Resolution process, all responsible personnel will maintain a commitment to impartiality.

When a no contact directive has been issued as a supportive measure or sanction in response to a complaint of a pattern or repeated actions on the part of the Respondent (such as, for example, a complaint of stalking or repeated sexual harassment), violations of no contact orders will be referred to appropriate student or employee conduct processes for enforcement. *Revised July 2026 27*

Investigation and Adjudication Procedures

The Respondent is presumed not responsible. A Respondent will be found responsible for violating this Policy only when such a finding is supported by the Preponderance of the Evidence.

Washington College, not the parties, has the burden of proof and the burden of gathering evidence sufficient to reach a finding of responsibility.

- **Appendix A** (p. 31) outlines the procedures for the resolution of reports of Title IX Sexual Harassment in violation of this Policy.

- **Appendix B** (p. 42) outlines the procedures for the resolution of reports of Non-Title IX Sexual Misconduct committed by students in violation of this Policy.

- **Appendix C** (p. 53) outlines the procedures for the resolution of reports of Non-Title IX Sexual Misconduct committed by employees in violation of this Policy.

XI. Sanctions

Remedial actions include (but are not limited to):

- College warning (except in cases of sexual assault/violence)
- Restrictions limiting access or participation in activities
- Suspension/expulsion
- Probation
- Termination of employment
- Protection from retaliation
- Counseling for the Reporting Party
- Other steps to address the impact of harassment or discrimination on the Reporting Party, any witnesses, and the College community

XII. Appeals

Both the Complainant and the Respondent may appeal the Title IX Coordinator's dismissal of a Formal Complaint or any allegations therein or, the determination of responsibility following a hearing or, on the following grounds:

- Procedural irregularity that affected the outcome of the matter; Revised *July 2026 28*
- New evidence that was not reasonably available at the time of the determination regarding responsibility or dismissal was made, that could affect the outcome of the matter. NOTE: evidence not included/provided in the investigation phase may NOT be presented at the hearing for the first time;
- 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
- Sanction or remedies imposed are not commensurate with finding made.

A party may commence an appeal by submitting a written statement to the Title IX Coordinator within ten (10) business days of issuance of the final determination of

responsibility or the dismissal of the Formal Complaint. The appeal statement must set forth:

- the determination(s) being appealed,
- the specific ground(s) for the appeal, and
- the facts supporting the grounds.

The appeal statement will be limited to 3,500 words. Failure to submit an appeal within the ten (10) business days or any approved extension constitutes waiver of the right to appeal.

A copy of the appeal statement will be provided to the other party, who, within ten (10) business days, may submit a written response to the Title IX Coordinator. The response should address both the specific ground(s) for appeal set forth in the appealing party's statement and the specific facts asserted by the appealing party. The response will be limited to 3,500 words.

The Title IX Coordinator will submit the appeal and response, if any, to the appellate panel, which will be comprised of three individuals appointed by the Title IX Coordinator. The panel members/reviewer will not be the Title IX Coordinator, the investigator, or a Decision-maker.

The Appeal Panel will establish a reasonable schedule for issuing a written decision, typically no later than thirty (30) business days after receipt of the non-appealing party's submission or the time for submission has expired.

The Appeal Panel may affirm the decision or sustain any of the above-specified grounds for appeal, in which case the Appeal Panel may:

- reverse a decision or finding;

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- change a sanction or remedy;
- remand a decision to the Title IX Coordinator;
- remand a case to the original Decision Maker(s) for clarification or reconsideration consistent with the Appeal Panel's decision, if doing so would assist with a timely, practicable, and efficient resolution of the case;
- remand a case for a new hearing to either the original Decision Maker(s) or a newly composed Decision Maker(s); or

- remand a case for a new or additional investigation, followed by an adjudication consistent with these procedures, to either the original investigator or to a new investigator.

If the Appeal Panel reverses a finding of not responsible, the Appeal Panel must also determine the sanctions and remedies to be included in their written decision. If the Impact/Mitigation Statements have not previously been distributed, they would be distributed to both parties only upon a finding of responsibility, and, in that instance, when the Title IX Coordinator distributes the Appeal Panel's written decision to the parties.

If the Appeal Panel calls for the admission of new evidence, if possible, it will remand the case to the Decision- maker from which it originated for a new hearing or review. Upon remand from the Appeal Panel, as necessary and possible, a Decision-maker may remand a case to the investigator from which it originated for further investigation.

The decision of the Appeal Panel will be final and binding on all parties.

XIII. Time Frames

Washington College seeks to resolve all reports of Prohibited Conduct pursuant to the following time frames:

- Informal Resolution: The informal resolution process is typically completed within 30–60 calendar days.

- Formal Resolution: The formal resolution process is typically completed within 90–120 calendar days.

The Title IX Coordinator may extend the time frames for good cause. Good cause for extension may include the unavailability of the parties or their advisors, concurrent law enforcement investigation, the complexity of the allegations, or other extenuating circumstances. Any extension, and the reason(s) therefore, will be shared with the parties, in writing. *Revised July 2026 30*

XIV. Training

The Title IX Coordinator, Investigators, Decision-makers, Appellate Reviewers, and Facilitators of Informal Resolutions, shall, at a minimum, receive all training and education required pursuant to Title IX, the Violence Against Women Act, and Maryland State Law.

XV. Record Keeping

Washington College will maintain the following records:

- Records of reports of Prohibited Conduct under this Policy and any actions taken in response to the reports, including the issuance of supportive measures and educational efforts;
- Records related to each Formal Resolution process;
- Records related to each Informal Resolution process;
- Materials used to train and educate the Title IX Coordinator, Investigators, Decision-makers, Appellate Reviewers, and Facilitators of Informal Resolutions.

This information will be used by the Title IX Coordinator to monitor patterns and areas of concern. In general records will be kept for seven (7) years after the date the reported incident is resolved. Certain records may be retained longer in the College's sole discretion, including for active employees. *Revised July 2026 31*

Appendix A

Procedures for the Formal Resolution of Formal Complaints of Title IX Sexual Harassment

I. Scope of These Procedures

The procedures set forth below will guide the investigation and adjudication of Formal Complaints of Title IX Sexual Harassment, as defined in Section VI (p. 5).

II. Initiation of the Investigation

An investigation under these procedures will be initiated at the Title IX Coordinator's direction after the filing of a Formal Complaint and the issuance of a Notice of Allegations to the parties.

III. The Investigation

1. Overview of the Investigation

The investigation is a neutral fact-gathering process. During the investigation, the parties will have an equal opportunity to be heard, to submit evidence, to identify witnesses who have relevant information, including fact and expert witnesses, and to submit questions that they believe should be directed by the investigator to each other or to any witness. The investigators will also seek to obtain relevant evidence identified during the investigation,

including relevant evidence that has not been offered by either party. The College may continue an investigation without the participation of any party.

1. The Investigator

Investigations will be conducted by one or more appropriately trained individuals appointed by the Title IX Coordinator. The Investigator(s) will be impartial and will conduct a prompt, thorough, and fair investigation. The Investigator(s) may be a College employee or an external party.

Evidence Collection Testimonial Evidence Collection: Investigative Interview

Testimony is evidence. Thus, throughout the investigation, the Investigator(s) will endeavor to interview the parties and other individuals (witnesses) who have information that is relevant or directly related to the allegations in the Formal Complaint, including fact and expert witnesses. The Investigator(s) will provide to everyone whose participation in an investigative interview is invited or expected written notice of the date, time, and location of

the interview, and the parties will be given a sufficient time to prepare to participate.

Non-Testimonial Evidence Collection

Evidence Collection Logs

If a party declines to participate in investigative interviews deemed necessary by the investigator, the party will forfeit the opportunity at the hearing to provide testimony at the hearing. If a witness declines to participate in an investigative interview, they will not be permitted to provide testimony at the hearing.

Investigative interviews may be conducted in person, or via telephone or video conference. Investigative interviews will be recorded. Following the investigative interview, the Investigator(s) will prepare a full written summary of the interview ("Interview Summary"). This summary will be shared with the interviewee and the interviewee will provided three (3) business days to submit, in writing to the investigator, any corrections to, or comments about, or proposed changes to, the interview summary that the interviewee believes is necessary to ensure the accuracy of the interview summary. Submissions made by the interviewee will be attached to the original summary. The deadline for submitting a response may be extended for good cause, upon request to the

Investigator(s). If no response is received from the interviewee, the summary prepared will be presumed accurate.

During the investigative interviews, the Investigator(s) will gather other available evidence and information that is directly related to the allegations in the Formal Complaint, including, without limitation, electronic and other records of communications between the parties or witnesses (via voicemail, text message, audio messages, email, or social media sites), photographs and videos, medical records (subject to required consent), and records generated by Campus Police or law enforcement.

The Investigator(s) will maintain a log of all testimonial and non-testimonial evidence obtained and the source of such evidence. The Investigator(s) will also maintain a log of all testimonial and non- testimonial evidence offered or sought, but not obtained, and the reason such evidence was not obtained. These logs will be part of the evidence file.

Review of the Draft Investigative Report and Draft Evidence File The Draft Evidence File

At the conclusion of the investigation, the Investigators will compile all of the evidence that is directly related to the allegations in the Formal Complaint, including the summaries of

the statements the parties and witness, evidence that is both inculpatory and exculpatory, and evidence upon which the investigator does not intend to rely. This compilation of evidence will be referred to as the "Draft Evidence File." *Revised July 2026 33*

The Draft Investigative Report

Review and Opportunity to Respond

Additional Evidence Collection

Prohibition of Evidence Not Offered During the Investigation

The Draft Evidence File will be intentionally organized to support comprehension and will be divided into at least two sections. One section will include evidence obtained that the Investigator(s) deems relevant to the allegations in the Formal Complaint. The other section(s) will include evidence that the Investigator(s) do not deem relevant, but that is otherwise directly related to the allegations in the Formal Complaint.

The Investigator(s) will also prepare a "Draft Investigative Report" that fairly summarizes the relevant evidence. The Draft Investigative Report will not include any findings.

Upon completion, the Investigator(s) will share the Draft Evidence File and Draft Investigative Report with the parties and their advisors electronically, or by hard copy. The

parties will then be afforded ten (10) business days to review the Draft Evidence File and Draft Investigative Report and to submit an optional written response, which may include responses to the evidence and requests that the Investigator(s) accept, seek, or obtain additional evidence or conduct follow up inquiries of the other party(ies) or witnesses. The parties' responses may also include challenges to the Investigator's assessment of relevance. Any responses submitted by the parties will be shared with the other party and made a part of the Final Evidence File.

The Investigator(s) will consider the written responses of the parties, if any, and will determine in their sole discretion, whether further investigative steps are required. If

additional investigative steps are taken that result in collection of additional evidence, such additional evidence will be included in the Draft Investigative File and incorporated, as appropriate, into the Draft Investigative Report. The new evidence and any changes to the Draft Investigative Report will be shared with the parties and their advisors electronically, or by hard copy. The parties will be provided with a final opportunity to respond, in writing. The Investigator will determine the length of this review period. Any additional responses submitted will be shared with the other party and made a part of the Final Evidence File.

In the absence of good cause, information discoverable through the exercise of due diligence that is not provided to the Investigator(s) during the investigation or during this designated response and review period will not be considered in the determination of responsibility for a violation of the Policy and will not be considered during the hearing process. *Revised July 2026 34*

Final Investigative Report and Final Evidence File The Final Investigative File

The Final Investigative Report

Submission of the Final Investigative Report and Evidence File to the Parties

At the conclusion of the fact gathering process and the review periods, as described in this Procedure, the Investigator(s) will prepare a Final Investigative File and Investigative Report.

The Final Investigative File will include all of the evidence that is directly related to the allegations in the Formal Complaint, including the summaries of the statements the parties and witness, evidence that is both inculpatory and exculpatory, and evidence upon which the College does not intend to rely. The Final Investigative File will also include any responses submitted by the parties during the evidence review period and a timeline of all procedural steps taken by the College from the time of the filing of the Formal Complaint to the conclusion of the investigation.

The Final Evidence File will be intentionally organized to support comprehension and will be divided into at least two sections. One section will include evidence obtained that the Investigator(s) deems relevant to the allegations in the Formal Complaint. The other section(s) will include evidence that the Investigator(s) do not deem relevant, but that is otherwise directly related to the allegations in the Formal Complaint. The final section will include the procedural timeline.

The Final Investigative Report will be prepared by the Investigator(s) and will fairly summarize all of the relevant evidence obtained during the investigation. Relevance Determinations are generally guided by the principles set forth below in Section V (p. 4) of this Procedure.

The Final Investigative Report and Evidence File will be simultaneously provided to the parties and their advisors in electronic format or hard copy, at least ten (10) business days prior to a hearing. The parties will have ten (10) business days to submit a written response to the Final Investigative Report and Evidence File.

The Final Investigative Report and Evidence File, and any written responses submitted by the parties will be provided to the Decision Maker(s).

IV. The Hearing

1. Overview *Revised July 2026 35*

Upon conclusion of the investigation, a hearing will be held to determine whether the Respondent is responsible for the alleged policy violations in the Formal Complaint. As set forth in Section X (p. 20) of this Policy, the Respondent is presumed not responsible. A Respondent will be found responsible for violating this Policy only when such a finding is supported by the Preponderance of the Evidence.

The hearing is a private proceeding. The only people present will be the parties, their advisors, the Decision-maker(s), witnesses (when testifying), and any staff necessary for conducting the hearing.

Hearing Participants Decision-makers

The Parties

The College will designate the Decision-maker for the moderation of the hearing and determination of finding and sanction. This may take the form of a single decision-maker or a three-member panel at the Title IX Coordinator's discretion. With a panel, one of the three members will be appointed as Chair by the Title IX Coordinator. The Decision-

maker(s) may not be the Title IX Coordinator, a facilitator of informal resolution, or the investigator.

Upon receipt of the notice of the Decision-Maker or three-member panel, Parties will have three (3) business days to object to the appointment of a Decision-maker, on the basis of demonstrated bias or conflict of interest.

The Parties are permitted to participate in the entirety of hearing, portions thereof, or they can decline to participate in the hearing entirely, and the Decision-maker(s) will not draw an adverse inference against a party based solely on their decision not to participate in all or some of the hearing proceedings.

If a party declines to participate in investigative interviews deemed necessary by the investigator, the party will not be permitted the opportunity to provide testimony at the hearing.

Nonetheless, if a party who has declined to participate in investigative interviews later seeks to participate in a hearing, upon a finding that there was a compelling reason for the nonparticipation, the Hearing Chair, upon the Chair's discretion, may permit the party to participate. If the Hearing Chair permits the party to participate in the hearing, the Hearing Chair will first reschedule or adjourn the hearing for the investigator to interview the party and, as necessary, conduct any follow-up investigation and supplement and revise the evidence file and the investigative report. *Revised July 2026 36*

Advisors

Witnesses

Hearing Facilitators

The parties have the right to have an advisor of their choice present at the hearing in accordance with Section X (p. 20) of this Policy. If a party does not have an advisor of choice, the Title IX Coordinator will appoint an advisor to that party for the sole purpose of conducting cross examination of other party and witnesses. A party's advisor of choice or an advisor appointed by the Title IX Coordinator may participate in the hearing for the sole purpose of conducting cross examination in the absence of their advisee.

As set forth in Section X (p. 20) of this Policy, Advisors may not speak on behalf of the parties or otherwise participate in, or in any manner delay or disrupt the hearing. If an advisor fails to comply with the procedures set forth herein or the established rules of decorum, the College reserves the right to exclude the advisor from further participation in

the process. The Title IX Coordinator is responsible for interpreting and applying this provision.

The Decision-maker(s) will determine, in their sole discretion, which witnesses will be invited to provide testimony at the hearing. Witnesses who are invited to participate in the hearing will be permitted to attend the hearing only when providing testimony.

A witness who declined to participate in an investigative interview will not be permitted to provide testimony at the hearing.

However, if a witness who declined to participate in investigative interviews later seeks to participate in a hearing, upon a finding that there was a compelling reason for the nonparticipation, the Decision-maker(s), upon their discretion, may permit the party to participate. If the Decision- maker(s) permits the party to participate in the hearing, the Decision-maker(s) will first reschedule or adjourn the hearing for the investigator to interview the party and, as necessary, conduct any follow-up investigation and supplement and revise the evidence file and the investigative report.

The orderly administration of hearings will be supported by Hearing Facilitators, who are individuals either internal or external to the College and appointed by the Title IX Coordinator.

The Title IX Coordinator may not serve as a Decision-maker or Chair in the matter but may serve as an administrative facilitator of the hearing if their previous role(s) in the matter do not create a conflict of interest. Otherwise, a designee may fulfill this role. *Revised July 2026 37*

1. Notice of Hearing

The Title IX Coordinator will notify the parties in writing of the date, time, and location/format of the hearing. The notice will include the charges at issue; a brief summary of the alleged prohibited conduct; and the applicable procedures under this Policy. All efforts will be made to provide the Notice of Hearing no later than five (5) days prior to the hearing and to schedule the hearing as soon as practicable.

Either party may request to have a hearing rescheduled. The request may be granted at the discretion of the Title IX Coordinator. Absent extenuating circumstances, requests to reschedule must be submitted at least three (3) days prior to the hearing. A request to reschedule a hearing must be supported by a compelling reason. Given the number of

individuals involved in a hearing, and the attendant difficulty of scheduling and rescheduling them in a timely manner, it may not be possible to accommodate all scheduling requests. The Title IX Coordinator may also reschedule a hearing, without a request by the parties, when there is reasonable cause to do so.

Hearing Format Pre-Hearing Conferences

Impact Mitigation Statements

The hearing will be live and will provide the parties an opportunity to address the Decision-maker(s) in person. Participants may be physically present in the same geographic location, or at the College's discretion, some or all of the hearing may be conducted remotely, using virtual platforms (i.e., video conferencing). Upon request to the Title IX Coordinator, a party may participate in the hearing remotely. Such requests for remote participation should be made at least two (2) days in advance of the scheduled hearing.

At least three (3) days prior to the hearing, the Title IX Coordinator and the Decision-maker(s) will meet with the parties and their advisors, separately, for the purposes of conducting a pre-hearing conference. At the pre-hearing conference, the Decision-

maker(s) will review these procedures, the Rules of Decorum, and the proposed hearing schedule and the parties will be permitted to ask questions.

The Decision-maker(s) will not discuss matters of evidence of evidentiary issues with the parties during the pre-hearing conference.

The parties will be permitted, but not required, to prepare a written Impact/Mitigation Statement relevant to any sanctions. Up until the start of the hearing, the parties may submit the statement. The statements are distributed to the Decision-maker(s) and the *Revised July 2026 38*

parties only if the Decision-maker(s) finds the Respondent responsible. The Title IX Coordinator will provide the Impact/Mitigation Statements to the parties with a copy of the Decision Maker(s)'s written decision.

Hearing Procedures Opening Instructions

Testimony

Closing Remarks by the Hearing Chair

Typically, the format of the hearing will be as follows:

The hearing will begin with opening instructions by the Hearing Chair. The parties will be afforded the opportunity to ask questions about the format of the hearing and these procedures at the conclusion of the Chair's opening instructions.

The Decision-maker(s) will determine the order of testimony. The Decision-maker(s) will question the party or witness first, followed by cross examination of a party by the other party's advisor. In the case of witness testimony, the Decision-maker(s) will question the witness first, followed by cross examination of the witness, first by Complainant's advisor and next, by the Respondent's advisor.

During cross examination, the party's advisor will be permitted to ask the opposing parties and any witnesses all relevant questions and follow-up questions, including those challenging credibility.

Before a Complainant, Respondent, or witness responds to a question by a party's advisor, the Decision-maker(s) must first determine whether the question is relevant and explain any decision to exclude a question as not relevant.

The Decision-maker(s) retain authority to ask questions at any time during testimony, including during cross examination by the advisors.

At the conclusion of testimony, the Hearing Chair will conclude the proceedings with brief closing remarks.

1. Determination Regarding Responsibility and Notice of Outcome

The Decision-maker(s) will determine whether the Respondent is responsible for the alleged violation(s) of the Policy by a majority vote based upon a preponderance of the evidence standard. The Decision- maker(s) retains discretion regarding the weight or

credibility to assign the evidence. If the Decision-maker(s) make a finding of responsibility, the Decision-maker(s) will determine the appropriate sanctions and remedies.

In matters where a finding of responsibility is made, the Decision-maker(s) will consider the Impact/Mitigation statements of the parties prior to determining sanction.

The Decision-maker(s) will issue a written determination of findings that will include the procedural steps taken during the investigation, the specific prohibited conduct for which the Respondent was found responsible and not responsible with identification of the

allegations potentially constituting Title IX sexual harassment, the findings of fact and the rationale for the Decision Maker(s)'s determinations regarding both responsibility and sanctions, whether remedies designed to restore or preserve equal access to the College's education program or activity will be provided by the College to the Complainant, sanctions and remedies if the Respondent is found responsible, and, instructions and time limits for appeals.

The decision may incorporate and reference any portions of the proceedings, including the evidence file and investigative report, as the Decision-maker(s) deems appropriate. Both the Complainant and the

Respondent will be simultaneously provided with a notice of outcome and the Decision-maker(s) written determination.

1. Hearing Record

An audio recording will be made of all hearings, but not of deliberations. The parties may listen to the audio recording of the hearing. Access will be facilitated in a manner deemed appropriate by the Title IX Coordinator.

Individuals appearing before the Decision-maker(s), whether as a party or witness, are prohibited from recording any portion of the hearing. The Decision-maker(s) members are also prohibited from recording any portion of the hearing.

The Decision-maker(s) has access to the hearing record. The hearing record will include: the audio recording and written transcript of the hearing, the Decision-maker(s)'s final determination, the final evidence file and investigative report, and if there is a determination of responsibility, the parties' Impact/Mitigation Statements, and information concerning the Respondent's prior misconduct.

V. Evidentiary Considerations

1. Relevance

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Prior Sexual History of Complainant

Prior or Subsequent Conduct

Mental Health Condition, Treatment or Diagnosis

Privilege

Determinations regarding relevance of any proffered evidence will be subject to the following requirements:

Evidence and questions about the Complainants sexual predisposition or prior sexual behavior are considered irrelevant unless such questions and evidence about the Complainant's prior sexual behavior are offered to prove that someone other than the Respondent committed the conduct alleged by the Complainant, or if 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.

Prior or subsequent conduct of a Respondent may be considered in determining pattern, knowledge, intent, motive, or absence of mistake. For example, evidence of a pattern of conduct prohibited by this policy by a Respondent, either before or after the incident in question, regardless of whether there has been a finding of a Policy violation, may be deemed relevant to a determination of responsibility.

Generally, during both the investigation and any hearing to determine responsibility, evidence of the party's mental health diagnosis or treatment is irrelevant and will not be permitted without the party's consent.

The investigator(s) and Decision-maker(s) will not allow, rely upon, or otherwise permit questions or evidence that is protected by a legally recognized privilege, unless the person holding such privilege has waived the privilege.

1. Newly Offered Evidence

If, after the issuance of the final evidence file and investigative report and prior to the issuance of the Decision-maker(s) decision, including at the hearing, a party or the investigator seek to present a witness or introduce evidence not offered prior to the hearing and not disclosed to the investigator, the

Decision-maker(s) may grant admission of the evidence such request upon a showing that the witness or evidence is relevant, material, newly discovered, and could not have been discovered during the investigation with due diligence. *Revised July 2026 41*

Where Decision-maker(s) permit a party to introduce a newly discovered witness or evidence, the Decision-maker(s) will reschedule or adjourn the hearing for the investigator to investigate the newly discovered witness or evidence and, if appropriate to amend the final evidence file and investigative report. *Revised July 2026 42*

Appendix B

Procedures for the Formal Resolution of Formal Complaints of Non-Title IX Prohibited Conduct by Students

I. Scope of These Procedures

The procedures set forth below will guide the investigation and adjudication of Formal Complaints of Non-Title IX Prohibited Conduct, as defined in Section VI (p. 5) of the Policy, where the Respondent is a student.

II. Initiation of the Investigation

An investigation under these procedures will be initiated at the Title IX Coordinator's direction after the filing of a Formal Complaint and the issuance of a Notice of Allegations to the parties.

III. The Investigation

1. Overview of the Investigation

The investigation is a neutral fact-gathering process. During the investigation, the parties will have an equal opportunity to be heard, to submit evidence, to identify witnesses who have relevant information, including fact and expert witnesses, and to submit questions that they believe should be directed by the investigator to each other or to any witness. The investigators will also seek to obtain relevant evidence identified during the investigation, including relevant evidence that has not been offered by either party. The College may continue an investigation without the participation of any party.

1. The Investigator

Investigations will be conducted by one or more appropriately trained individuals appointed by the Title IX Coordinator. The Investigator(s) will be impartial and will conduct a prompt, thorough, and fair investigation. The Investigator(s) may be a College employee or an external party.

1 Evidence Collection

2 Testimonial Evidence Collection: Investigative Interviews

Testimony is evidence. Thus, throughout the investigation, the Investigator(s) will endeavor to interview the parties and other individuals (witnesses) who have information that is relevant or directly related to the allegations in the Formal Complaint, including fact and expert witnesses. The Investigator(s) will provide to everyone whose participation in an *Revised July 2026 43*

investigative interview is invited or expected written notice of the date, time, and location of the interview, and the parties will be given a sufficient time to prepare to participate.

If a party declines to participate in investigative interviews deemed necessary by the investigator, the party will forfeit the opportunity at the hearing to provide testimony at the hearing. If a witness declines to participate in an investigative interview, they will not be permitted to provide testimony at the hearing.

Investigative interviews may be conducted in person, or via telephone or video conference. Investigative interviews will be recorded. Following the investigative interview, the Investigator(s) will prepare a full written summary of the interview ("Interview Summary"). This summary will be shared with the interviewee and the interviewee will provided three (3) business days to submit, in writing to the investigator, any corrections to, or comments about, or proposed changes to, the interview summary that the interviewee believes is necessary to ensure the accuracy of the interview summary. Submissions made by the interviewee will be attached to the original summary. The deadline for submitting a response may be extended for good cause, upon request to the

Investigator(s). If no response is received from the interviewee, the summary prepared will be presumed accurate.

Non-Testimonial Evidence Collection

During the investigative interviews, the Investigator(s) will gather other available evidence and information that is directly related to the allegations in the Formal Complaint, including, without limitation, electronic and other records of communications between the parties or witnesses (via voicemail, text message, audio messages, email, or social media sites), photographs and videos, medical records (subject to required consent), and records generated by Campus Police or law enforcement.

Evidence Collection Logs

The Investigator(s) will maintain a log of all testimonial and non-testimonial evidence obtained and the source of such evidence. The Investigator(s) will also maintain a log of all testimonial and non- testimonial evidence offered or sought, but not obtained, and the reason such evidence was not obtained. These logs will be included in the evidence file.

Review of the Draft Investigative Report and Draft Evidence File The Draft Evidence File

At the conclusion of the investigation, the Investigators will compile all of the evidence that is directly related to the allegations in the Formal Complaint, including the summaries of *Revised July 2026 44*

The Draft Investigative Report

Review and Opportunity to Respond

Additional Evidence Collection

Prohibition of Evidence Not Offered During the Investigation

the statements the parties and witness, evidence that is both inculpatory and exculpatory, and evidence upon which the investigator does not intend to rely. This compilation of evidence will be referred to as the "Draft Evidence File."

The Draft Evidence File will be intentionally organized to support comprehension and will be divided into at least two sections. One section will include evidence obtained that the Investigator(s) deems relevant to the allegations in the Formal Complaint. The other section(s) will include evidence that the Investigator(s) do not deem relevant, but that is otherwise directly related to the allegations in the Formal Complaint.

The Investigator(s) will also prepare a "Draft Investigative Report" that fairly summarizes the relevant evidence. The Draft Investigative Report will not include any findings.

Upon completion, the Investigator(s) will share the Draft Evidence File and Draft Investigative Report with the parties and their advisors electronically, or by hard copy. The parties will then be afforded ten (10) business days to review the Draft Evidence File and Draft Investigative Report and to submit an optional written response, which may include responses to the evidence and requests that the Investigator(s) accept, seek, or obtain additional evidence or conduct follow up inquiries of the other party(ies) or witnesses. The parties' responses may also include challenges to the Investigator's assessment of

relevance. Any responses submitted by the parties will be shared with the other party and made a part of the Final Evidence File.

The Investigator(s) will consider the written responses of the parties, if any, and will determine in their sole discretion, whether further investigative steps are required. If additional investigative steps are taken that result in collection of additional evidence, such additional evidence will be included in the Draft Investigative File and incorporated, as appropriate, into the Draft Investigative Report. The new evidence and any changes to the Draft Investigative Report and will be shared with the parties and their advisors electronically, or by hard copy. The parties will be provided with a final opportunity to respond, in writing. The Investigator will determine the length of this review period.

Any additional responses submitted will be shared with the other party and made a part of the Final Evidence File. *Revised July 2026 45*

In the absence of good cause, information discoverable through the exercise of due diligence that is not provided to the Investigator(s) during the investigation or during this designated response and review period will not be considered in the determination of responsibility for a violation of the Policy and will not be considered during the hearing process.

Submission of the Final Investigative Report and Evidence File to the Parties

At the conclusion of the fact gathering process and the review periods, as described in this Procedure, the Investigator(s) will prepare a Final Investigative File and Investigative Report.

The Final Investigative File will include all of the evidence that is directly related to the allegations in the Formal Complaint, including the summaries of the statements the parties and witness, evidence that is both inculpatory and exculpatory, and evidence upon which the College does not intend to rely. The Final Investigative File will also include any responses submitted by the parties during the evidence review period and a timeline of all procedural steps taken by the College from the time of the filing of the Formal Complaint to the conclusion of the investigation.

The Final Evidence File will be intentionally organized to support comprehension and will be divided into at least two sections. One section will include evidence obtained that the Investigator(s) deems relevant to the allegations in the Formal Complaint. The other section(s) will include evidence that the Investigator(s) do not deem relevant, but that is otherwise directly related to the allegations in the Formal Complaint. The final section will include the procedural timeline.

The Final Investigative Report will be prepared by the Investigator(s) and will fairly summarize all of the relevant evidence obtained during the investigation. Relevance

Determinations are generally guided by the principles set forth below in Section V (p. 4) of this Procedure.

The Final Investigative Report and Evidence File will be simultaneously provided to the parties and their advisors in electronic format or hard copy, at least ten (10) business days prior to a hearing. The parties will have ten (10) business days to submit a written response to the Final Investigative Report and Evidence File. *Revised July 2026 46*

The Final Investigative Report and Evidence File, and any written responses submitted by the parties will be provided to the Decision Maker(s).

IV. The Hearing

1. Overview

Upon conclusion of the investigation, a hearing will be held to determine whether the Respondent is responsible for the alleged policy violations in the Formal Complaint. As set forth in Section X (p. 20) of this Policy, the Respondent is presumed not responsible. A Respondent will be found responsible for violating this Policy only when such a finding is supported by the Preponderance of the Evidence.

The hearing is a private proceeding. The only people present will be the parties, their advisors, the Decision- maker(s), witnesses (when testifying), and any staff necessary for conducting the hearing.

1 Hearing Participants

2 Decision-makers

The College will designate the Decision-maker for the moderation of the hearing and determination of finding and sanction. This may take the form of a single decision-maker or a three-member panel at the Title IX Coordinator's discretion. With a panel, one of the three members will be appointed as Chair by the Title IX Coordinator. The Decision-maker(s) may not be the Title IX Coordinator, a facilitator of informal resolution, or the investigator.

Upon receipt of the notice of the Decision-Maker or three-member panel, Parties will have three (3) business days to object to the appointment of a Decision-maker, on the basis of demonstrated bias or conflict of interest.

The Parties

The Parties are permitted to participate in the entirety of hearing, portions thereof, or they can decline to participate in the hearing entirely, and the Decision-maker(s) will not draw an adverse inference against a party based solely on their decision not to participate in all or some of the hearing proceedings.

If a party declines to participate in investigative interviews deemed necessary by the investigator, the party will not be permitted the opportunity to provide testimony at the hearing. *Revised July 2026 47*

Nonetheless, if a party who has declined to participate in investigative interviews later seeks to participate in a hearing, upon a finding that there was a compelling reason for the nonparticipation, the Hearing Chair, upon the Chair's discretion, may permit the party to participate. If the Hearing Chair permits the party to participate in the hearing, the Hearing Chair will first reschedule or adjourn the hearing for the investigator to interview the party and, as necessary, conduct any follow-up investigation and supplement and revise the evidence file and the investigative report.

Advisors

The parties have the right to have an advisor of their choice present at the hearing in accordance with Section X (p. 20) of this Policy. If a party does not have an advisor of choice, the Title IX Coordinator will appoint an advisor to that party for the sole purpose of conducting cross examination of other party and witnesses. A party's advisor of choice or an advisor appointed by the Title IX Coordinator may participate in the hearing for the sole purpose of conducting cross examination in the absence of their advisee.

As set forth in Section X (p. 20) of this Policy, Advisors may not speak on behalf of the parties or otherwise participate in, or in any manner delay or disrupt the hearing.

If an advisor fails to comply with the procedures set forth herein or the established rules of decorum, the College reserves the right to exclude the advisor from further participation in the process. The Title IX Coordinator is responsible for interpreting and applying this provision.

Witnesses

The Decision-maker(s) will determine, in their sole discretion, which witnesses will be invited to provide testimony at the hearing. Witnesses who are invited to participate in the hearing will be permitted to attend the hearing only when providing testimony.

A witness who declined to participate in an investigative interview will not be permitted to provide testimony at the hearing.

However, if a witness who has declined to participate in investigative interviews later seeks to participate in a hearing, upon a finding that there was a compelling reason for the nonparticipation, the Decision-maker(s), upon their discretion, may permit the party to participate. If the Decision- maker(s) permits the party to participate in the hearing, the Decision-maker(s) will first reschedule or adjourn the hearing for the investigator to interview the party and, as necessary, conduct any follow-up investigation and supplement and revise the evidence file and the investigative report.

Hearing Facilitators

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The orderly administration of hearings will be supported by Hearing Facilitators, who are individuals either internal or external to the College and appointed by the Title IX Coordinator.

The Title IX Coordinator may not serve as a Decision-maker or Chair in the matter but may serve as an administrative facilitator of the hearing if their previous role(s) in the matter does not create a conflict of interest. Otherwise, a designee may fulfill this role.

1. Notice of Hearing

The Title IX Coordinator will notify the parties in writing of the date, time, and location/format of the hearing. The notice will include the charges at issue; a brief summary of the alleged prohibited conduct; and the applicable procedures under this Policy. All efforts will be made to provide the Notice of Hearing no later than five (5) days prior to the hearing and to schedule the hearing as soon as practicable.

Either party may request to have a hearing rescheduled. The request may be granted at the discretion of the Title IX Coordinator. Absent extenuating circumstances, requests to reschedule must be submitted at least three (3) business days prior to the hearing. A request to reschedule a hearing must be supported by a compelling reason. Given the number of individuals involved in a hearing, and the attendant difficulty of scheduling and

rescheduling them in a timely manner, it may not be possible to accommodate all scheduling requests. The Title IX Coordinator may also reschedule a hearing, without a request by the parties, when there is reasonable cause to do so.

1. Hearing Format

The hearing will be live and will provide the parties an opportunity to address the Decision-maker(s) in person. Participants may be physically present in the same geographic location, or at the College's discretion, some or all of the hearing may be conducted remotely, using virtual platforms (i.e., video conferencing). Upon request to the Title IX Coordinator, a party may participate in the hearing remotely. Such requests for remote participation should be made at least two (2) days in advance of the scheduled hearing.

Pre-Hearing Conferences

At least three (3) days prior to the hearing, the Title IX Coordinator and the Decision-maker(s) will meet with the parties and their advisors, separately, for the purposes of conducting a pre-hearing conference. At the pre-hearing conference, the Decision-maker(s) will review these procedures, the Rules of Decorum, and the proposed hearing schedule and the parties will be permitted to ask questions. *Revised July 2026 49*

The Decision-maker(s) will not discuss matters of evidentiary issues with the parties during the pre-hearing conference.

Impact Mitigation Statements

The parties will be permitted, but not required, to prepare a written Impact/Mitigation Statement relevant to any sanctions. The parties have until the start of the hearing to submit the statement. The statements are distributed to the Decision-maker(s) and the parties only if the Decision-maker(s) finds the Respondent responsible. The Title IX Coordinator will provide the Impact/Mitigation Statements to the parties with a copy of the Decision Maker(s)'s written decision.

1. Hearing Procedures

Typically, the format of the hearing will be as follows:

Opening Instructions

The hearing will begin with opening instructions by the Hearing Chair. The parties will be afforded the opportunity to ask questions about the format of the hearing and these procedures at the conclusion of the Chair's opening instructions.

Testimony

The Decision-maker(s) will determine the order of testimony. The Decision-maker(s) will question the party or witness first, followed by cross examination of a party by the other party's advisor. In the case of witness testimony, the Decision-maker(s) will question the witness first, followed by cross examination of the witness, first by Complainant's advisor and next, by the Respondent's advisor.

During cross examination, the party's advisor will be permitted to ask the opposing parties and any witnesses all relevant questions and follow-up questions, including those challenging credibility.

Before a Complainant, Respondent, or witness responds to a question by a party's advisor, the Decision-maker(s) must first determine whether the question is relevant and explain any decision to exclude a question as not relevant.

The Decision-maker(s) retains authority to ask questions at any time during testimony, including during cross examination by the advisors.

Closing Remarks by the Hearing Chair *Revised July 2026 50*

At the conclusion of testimony, the Hearing Chair will conclude the proceedings with brief closing remarks.

1. Determination Regarding Responsibility and Notice of Outcome

The Decision-maker(s) will determine whether the Respondent is responsible for the alleged violation(s) of the Policy by a majority vote based upon a preponderance of the evidence standard. The Decision-maker(s) retains discretion regarding the weight or credibility to assign the evidence. If the Decision-maker(s) makes a finding of responsibility, the Decision-maker(s) will determine the appropriate sanctions and remedies.

In matters where a finding of responsibility is made, the Decision-maker(s) will consider the Impact/Mitigation statements of the parties prior to determining sanction.

The Decision-maker(s) will issue a written determination of findings that will include the procedural steps taken during the investigation, the specific prohibited conduct for which the Respondent was found responsible and not responsible with identification of the allegations potentially constituting Title IX sexual harassment, the findings of fact and the rationale for the Decision Maker(s)'s determinations regarding both responsibility and sanctions, whether remedies designed to restore or preserve equal access to the College's education program or activity will be provided by the College to the Complainant, sanctions and remedies if the Respondent is found responsible, and, instructions and time limits for appeals.

The decision may incorporate and reference any portions of the proceedings, including the evidence file and investigative report, as the Decision-maker(s) deems appropriate. Both the Complainant and the

Respondent will be simultaneously provided with a notice of outcome and the Decision-maker(s) written determination.

Hearing Record

An audio recording will be made of all hearings, but not of deliberations. The parties may listen to the audio recording of the hearing. Access will be facilitated in a manner deemed appropriate by the Title IX Coordinator.

Individuals appearing before the Decision-maker(s), whether as a party or witness, are prohibited from recording any portion of the hearing. The Decision-maker(s) members are also prohibited from recording any portion of the hearing.

The Decision-maker(s) has access to the hearing record. The hearing record will include: the audio recording and written transcript of the hearing, the Decision-maker(s)'s final
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determination, the final evidence file and investigative report, and if there is a determination of responsibility, the parties' Impact/Mitigation Statements, and information concerning the Respondent's prior misconduct.

V. Evidentiary Considerations

1. Relevance

Determinations regarding relevance of any proffered evidence will be subject to the following requirements:

Prior Sexual History of Complainant

Evidence and questions about the Complainant's sexual predisposition or prior sexual behavior are considered irrelevant unless such questions and evidence about the Complainant's prior sexual behavior are offered to prove that someone other than the Respondent committed the conduct alleged by the Complainant, or if 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.

Prior or Subsequent Conduct

Prior or subsequent conduct of a Respondent may be considered in determining pattern, knowledge, intent, motive, or absence of mistake. For example, evidence of a pattern of conduct prohibited by this policy by a Respondent, either before or after the incident in question, regardless of whether there has been a finding of a Policy violation, may be deemed relevant to a determination of responsibility.

Mental Health Condition, Treatment or Diagnosis

Generally, during both the investigation and any hearing to determine responsibility, evidence of the party's mental health diagnosis or treatment is irrelevant and will not be permitted without the party's consent.

Privilege

The investigator(s) and Decision-maker(s) will not allow, rely upon, or otherwise permit questions or evidence that is protected by a legally recognized privilege, unless the person holding such privilege has waived the privilege.

1. Newly Offered Evidence

If, after the issuance of the final evidence file and investigative report and prior to the issuance of the Decision-maker(s) decision, including at the hearing, a party or the *Revised July 2026 52*

investigator seek to present a witness or introduce evidence not offered prior to the hearing and not disclosed to the investigator, the

Decision-maker(s) may grant admission of the evidence such request upon a showing that the witness or evidence is relevant, material, newly discovered, and could not have been discovered during the investigation with due diligence.

Where Decision-maker(s) permits a party to introduce a newly discovered witness or evidence, the Decision-maker(s) will reschedule or adjourn the hearing for the investigator to investigate the newly discovered witness or evidence and, if appropriate to amend the final evidence file and investigative report. *Revised July 2026 53*

Appendix C

Procedures for the Formal Resolution of Formal Complaints of Non-Title IX Prohibited Conduct by Employees

- In a situation where the complainant and respondent are employees or contractors, all appropriate employment guidelines will be followed for investigation and resolution.
- In a situation where the complainant is a student and the respondent is an employee, all appropriate employment guidelines will be followed for resolution.
- In a situation where the respondent is a student and the complainant is faculty, staff or a contractor, all appropriate guidelines & policies detailed in the Title IX policy in the Student Handbook will be followed.

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Appendix D

Resources for Support

Resources for Victims of Sexual Assault

There are many services established to assist individuals who have been sexually assaulted. The following may be contacted to provide assistance or for any questions:

- **Washington College Health Services**, (410) 778-7261 (confidential resource)
- **Washington College Counseling Services**, (410) 778-7261 (confidential resource)
- **For All Seasons Sexual Assault Crisis Center**, 1-800-310-7273 (a 24-hour confidential service that provides counseling, advocacy, and support to survivors)
- **Title IX Coordinator**, (410) 778-7752
- **Campus Police/Department of Public Safety**, (410) 778-7810

A member of the Department of Public Safety is available 24 hours a day, seven days a week to transport the Complainant to either hospital listed below if requested. Volunteers from the For All Seasons Sexual Assault Crisis Center are also available to provide counseling and assistance throughout this process.

Two area hospitals have sexual assault response programs in place, including Department of State Police Sexual Assault Evidence Collection Kits. Forensic Nurse Examiners are available 24 hours a day, seven days a week to provide confidential medical examination and STI and pregnancy prophylactics. The programs work in conjunction with For All Seasons, Inc. to provide advocacy support to victims.

- University of Maryland Shore Medical Center at Chestertown, located adjacent to Washington College: 410-778-3300
- University of Maryland Shore Medical Center at Easton: 410-822-1000

Trained Title IX Advocates are available to support both a complainant and respondent through all aspects of the Title IX process. These individuals receive training annually to assist students in dealing with the Title IX process.

Sexual Assault Campus Climate Survey

Beginning in 2016, in compliance with Maryland House Bill 571, Washington College conducts a sexual assault campus climate survey every two years. Survey data will be utilized to inform our response, prevention and education effort

Violence Against Women Act (VAWA)

The **Violence Against Women Act (VAWA)** and amendments to the Clery Act expanded federal campus safety requirements related to sexual assault, dating violence, domestic violence, and stalking.

Washington College is committed to providing a campus environment in which all members of the community are treated with dignity and respect and have access to information, supportive resources, reporting options, and assistance following incidents of sexual assault, dating violence, domestic violence, or stalking.

Consistent with applicable federal requirements, Washington College includes statistics for reportable incidents of **dating violence, domestic violence, sexual assault, and stalking** within its Annual Security Report when those incidents meet applicable Clery Act reporting requirements.

Washington College also provides prevention and awareness programming and information regarding procedures and resources available to students and employees who report experiencing these offenses.

VAWA Definitions

For purposes of Clery Act reporting and VAWA requirements, the following definitions apply.

Dating Violence

Dating violence means 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 is considered based upon the reporting party's statement and factors including:

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

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

Dating violence does not include acts that meet the definition of domestic violence.

Domestic Violence

Domestic violence generally includes a felony or misdemeanor crime of violence committed by a person who has a qualifying domestic or intimate relationship with the victim as defined by applicable federal requirements.

This may include violence committed:

- By a current or former spouse or intimate partner;
- By a person with whom the victim shares a child;
- By a person who is or has cohabitated with the victim as a spouse or intimate partner;
- By a person similarly situated to a spouse under applicable domestic or family violence laws; or
- By another person whose conduct is covered by applicable domestic or family violence laws.

Stalking

Stalking means engaging in a course of conduct directed at a specific person that would cause a reasonable person to:

- Fear for their safety or the safety of others; or
- Suffer substantial emotional distress.

A **course of conduct** generally means two or more acts in which an individual directly, indirectly, or through third parties follows, monitors, observes, surveils, threatens, communicates to or about another person, or interferes with that person's property.

Stalking can occur through in-person behavior as well as electronic or technology-assisted communications.

Maryland Law

In addition to the federal definitions used for Clery Act reporting, conduct involving sexual assault, domestic violence, dating violence, or stalking may constitute a criminal offense under Maryland law.

The definitions and requirements of Maryland criminal law are separate from the definitions used by Washington College for Clery Act statistical reporting or College disciplinary proceedings.

Domestic Violence and Abuse Under Maryland Law

Maryland law provides protections for individuals experiencing abuse in certain domestic, family, household, sexual, or intimate relationships.

Conduct constituting abuse for purposes of Maryland protective-order law may include:

- Assault;
- An act that places a person in fear of imminent serious bodily harm;
- An act that causes serious bodily harm;
- Rape or sexual offense;
- Attempted rape or sexual offense;
- Stalking;
- False imprisonment; and
- Other conduct recognized under applicable Maryland law.

Victims may be eligible to seek court protection depending upon their relationship with the person alleged to have committed the abuse and the circumstances of the incident.

Sexual Assault and Sexual Offenses Under Maryland Law

Maryland criminal law prohibits numerous forms of nonconsensual sexual conduct.

Depending upon the circumstances, criminal conduct may include:

- Vaginal intercourse or a sexual act without consent;
- Sexual contact without consent;
- Sexual conduct involving force or certain threats;
- Sexual conduct involving the use or display of a dangerous weapon;
- Sexual conduct involving strangulation, suffocation, or serious physical injury;

- Sexual conduct involving an individual who is substantially cognitively impaired, mentally incapacitated, or physically helpless;
- Certain sexual conduct involving minors based upon the ages of the individuals involved; and
- Other prohibited sexual conduct identified by Maryland law.

Maryland law currently establishes offenses including **rape in the first degree, rape in the second degree, sexual offense in the third degree, and sexual offense in the fourth degree**, among other sexual crimes.

The specific criminal offense applicable to an incident depends upon the facts and circumstances and the requirements established by Maryland law.

Members of the Washington College community are not expected to determine which criminal statute may apply before reporting an incident. Individuals are encouraged to report sexual violence or suspected criminal conduct so appropriate assistance and reporting options can be provided.

Maryland Protective Orders

Maryland law provides **Protective Orders** and **Peace Orders**, which may provide court-ordered protections to individuals experiencing abuse, threats, harassment, stalking, sexual violence, or certain other prohibited conduct.

Protective Orders

Eligibility for a Protective Order generally depends upon the relationship between the petitioner and respondent or other circumstances recognized under Maryland law.

Qualifying relationships or circumstances may include certain:

- Current or former spouses;
- Family members;
- Individuals related by blood, marriage, or adoption;
- Individuals who have lived together in certain intimate relationships;
- Parents of a child together;

- Individuals who have had a sexual relationship;
- Vulnerable adults; and
- Victims of rape or sexual assault, including certain attempted offenses.

Depending upon the circumstances, a court may order a respondent to:

- Stop abusing, threatening, or harassing the petitioner;
- Have no contact with the petitioner;
- Stay away from the petitioner's residence, workplace, school, or other specified locations; and
- Comply with other protections ordered by the court.

Peace Orders

Individuals whose relationship with another person does not qualify for a Protective Order may be eligible to request a **Peace Order**.

Peace Orders may be available in circumstances involving conduct such as:

- Abuse;
- Harassment;
- Stalking;
- Trespassing;
- Malicious destruction of property;
- Misuse of telephone or electronic communications;
- Nonconsensual distribution of intimate images;
- Visual surveillance; and
- Other qualifying conduct under Maryland law.

Peace Orders and Protective Orders are issued by Maryland courts. Eligibility and available protections depend upon the circumstances of each case.

Washington College Campus Police can provide information concerning law enforcement reporting and available resources. Campus Police personnel cannot guarantee that a court will issue a Protective Order or Peace Order.

Reporting to Law Enforcement

Individuals who experience sexual assault, dating violence, domestic violence, stalking, or other criminal conduct may report the incident to **Washington College Campus Police**.

Individuals may also contact local law enforcement or request assistance from Campus Police in making appropriate notifications.

In an emergency or when there is an immediate threat to safety, call 911.

Washington College Campus Police can be contacted at:

410-778-7810

Reporting an incident promptly may assist law enforcement in preserving evidence and investigating the circumstances. However, individuals are encouraged to seek assistance regardless of when an incident occurred.

Preservation of Evidence

Following an incident of sexual assault, dating violence, domestic violence, or stalking, preserving evidence may be important for obtaining a protective order, conducting an investigation, or pursuing criminal or disciplinary action.

Depending upon the circumstances, evidence may include:

- Text messages;
- Emails;
- Social media communications;
- Voicemails;
- Photographs;
- Video recordings;
- Clothing or other physical evidence;

- Medical records;
- Screenshots;
- Call logs;
- Written notes documenting incidents;
- Photographs of injuries or property damage; and
- Other communications or records relevant to the incident.

Individuals should avoid deleting electronic communications or other potential evidence when possible.

Campus Police and other appropriate resources can provide additional information concerning evidence preservation based upon the circumstances of an incident.

Sex Offender Registry Information

The **Campus Sex Crimes Prevention Act** requires institutions of higher education to advise the campus community where information concerning registered sex offenders provided by the state may be obtained.

Information concerning registered sex offenders in Maryland is maintained by the **Maryland Department of Public Safety and Correctional Services (DPSCS)** through the Maryland Sex Offender Registry.

Members of the campus community may access publicly available sex offender registry information through the Maryland Department of Public Safety and Correctional Services.

Prevention, Education, and Awareness

Washington College is committed to providing educational programs intended to promote awareness and prevention of sexual assault, dating violence, domestic violence, and stalking.

Educational and prevention efforts may address:

- Definitions of prohibited conduct;
- Consent;
- Healthy and respectful relationships;

- Recognition of warning signs;
- Risk reduction;
- Bystander intervention;
- Reporting options;
- Evidence preservation;
- Campus and community resources;
- Protective measures and supportive resources; and
- Information concerning College policies and procedures.

Campus Police works collaboratively with appropriate Washington College departments and community partners to support prevention, education, reporting, and response efforts.

Members of the campus community are encouraged to seek assistance whenever they experience or become aware of conduct that may constitute sexual assault, dating violence, domestic violence, or stalking.

Links;

Maryland Courts – Domestic Violence and Protective Orders:

https://www.mdcourts.gov/legalhelp/domesticviolence

Maryland Courts – Peace Orders:

https://www.mdcourts.gov/legalhelp/peaceorders

Maryland Sex Offender Registry:

https://dpscs.maryland.gov/onlineservs/socem/default.shtml

WASHINGTON COLLEGE POLICY ON WEAPONS, AMMUNITION, AND FIREWORKS

The possession, storage, or use of fireworks, firearms, ammunition, explosives, weapon replicas, or other weapons, including any dangerous article or substance with the potential to injure or discomfort a person, including knives with blades of three inches or longer, is prohibited at any time for any purpose at any place on the campus or other property of Washington College. This regulation may be conditionally waived for temporary periods by the President of Washington College for authorized Campus Police Officers or other law enforcement officers in the line of duty, for College-sanctioned public firework displays presented and supervised by qualified groups and individuals, and for College- sanctioned athletic events supervised by the Athletic Department.

This regulation may also be conditionally waived for temporary periods by Washington College Campus Police (which will inform the President of Washington College if such an exception is made) under such conditions as may be prescribed to permit the exhibition and temporary storage on campus of such articles in connection with activities or events approved and sanctioned by the College.

This regulation does not prohibit an individual otherwise subject to its provisions from carrying or possessing Chemical Mace or similar chemical sprays or propellants on campus property provided that such carrying or possession would not constitute a crime under Maryland criminal law.

Any violation of the above policy by a student will be referred to the student conduct process for adjudication.

Additionally, all incidents of possession of suspected illegal weapons will be investigated by Campus Police and students possessing illegal weapons will likely face removal from campus as an interim measure, pending formal conduct review and possible criminal charges.

WASHINGTON COLLEGE MISSING STUDENT PROCEDURES

If a member of the College community has reason to believe that a student who resides in on-campus housing is missing, they should immediately contact Campus Police at 410-778- 7810.

Campus Police will respond to the caller and initiate an investigation. After assessing the missing person information, should Campus Police determine the student appears to be missing, Washington College will notify the Chestertown Police Department for additional assistance, provide them with a report, and notify the student's emergency contact person (if one is provided) no later than 24 hours after the student is determined to be missing. If the missing student is under 18 years of age and is not an emancipated individual, Washington College will notify the student's parent or legal guardian immediately after Campus Police has determined that the student is missing. This policy does not preclude Washington College from initiating internal missing person procedures in less than 24 hours if circumstances warrant faster implementation.

In addition to registering an emergency contact, students residing in on-campus housing have the option to identify confidentially an individual to be contacted by Washington College in the event the student is determined to be missing for more than 24 hours. Only college officials and campus law enforcement will have access to the confidential contact person information.

ALCOHOL AND OTHER DRUG POLICIES

Washington College is committed to maintaining a safe, healthy, and educational environment for students, faculty, staff, and visitors. The College maintains policies governing the possession, consumption, distribution, and use of alcohol, cannabis, controlled substances, and other drugs on College property and at College-sponsored activities.

Members of the Washington College community are expected to comply with applicable federal, state, and local laws, as well as Washington College policies.

Violations of College alcohol or drug policies may result in educational interventions, referral to the student conduct process, and/or other appropriate action. Conduct that may

constitute a violation of criminal law may also be referred to Washington College Campus Police or another appropriate allied law enforcement agency.

Alcohol Policy

Washington College students and their guests are required to comply with Maryland law and College policies regarding the possession, consumption, and distribution of alcoholic beverages.

Individuals under the legal drinking age of 21 may not possess, consume, be provided, or provide alcoholic beverages.

Students who are 21 years of age or older may possess and consume alcohol only as permitted by Washington College policy.

The College prohibits alcohol-related conduct that creates an unreasonable risk to the health, safety, or well-being of individuals or the campus community.

Prohibited conduct includes, but is not limited to:

- Possession or consumption of alcohol by individuals under 21;
- Providing alcohol to an underage person;
- Disruptive or dangerous behavior related to alcohol consumption;
- Possession or use of kegs, funnels, or other devices intended to facilitate excessive or binge drinking;
- Drinking games involving alcohol;
- Unauthorized sale or distribution of alcohol;
- Possession or consumption of alcohol in locations where it is prohibited;
- Providing a location for unauthorized or underage alcohol consumption; and
- Other violations of applicable law or Washington College policy.

Students are responsible for complying with College policies and may also be held responsible for the behavior of their guests as provided by the Student Handbook.

Cannabis

Although Maryland law permits certain possession and use of cannabis under state law, possession and use of cannabis remains prohibited on Washington College property.

Washington College's cannabis prohibition applies to students regardless of age and includes College buildings, residence halls, outdoor areas, vehicles located on College property, and College-sponsored activities as provided by College policy.

The prohibition includes cannabis possessed or used for recreational or medical purposes when such possession or use is prohibited by applicable federal law or College policy.

Students found possessing or using cannabis may be referred to the student conduct process. Conduct that may violate Maryland law may also be referred to Campus Police or another appropriate allied law enforcement agency.

Drug paraphernalia associated with prohibited drug use is also prohibited in accordance with College policy.

Other Controlled Substances

The unauthorized possession, use, manufacture, distribution, or sale of controlled substances is prohibited.

Students are expected to comply with applicable federal and Maryland laws regarding controlled substances.

Possession or use of a controlled substance without a valid prescription, or possession or use of another person's prescription medication, may constitute a violation of College policy and/or applicable law.

Students suspected of violating College drug policies may be referred to the student conduct process. When circumstances indicate potential criminal activity, Campus Police may conduct or coordinate an appropriate allied law enforcement investigation.

Opioid Overdose Prevention and Naloxone

Washington College recognizes that opioid overdoses are potentially fatal medical emergencies and is committed to promoting rapid intervention when an overdose is suspected.

Naloxone, commonly known by the brand name Narcan, is a medication capable of temporarily reversing the effects of an opioid overdose.

Washington College maintains naloxone through designated campus resources, including Washington College Campus Police and Health Services.

Signs of a possible opioid overdose may include:

- Unresponsiveness or inability to wake;
- Slow, shallow, irregular, or stopped breathing;
- Blue, gray, or pale lips or skin;
- Pinpoint pupils;
- Choking, gurgling, or unusual snoring sounds; and
- Loss of consciousness.

A suspected opioid overdose is a medical emergency.

Call 911 immediately.

Washington College Campus Police should also be contacted at 410-778-7810.

Do not assume that an unconscious person can simply "sleep it off." Remain with the individual when it is safe to do so and follow instructions provided by emergency dispatchers and responding personnel.

Medical Amnesty

Washington College recognizes that students may sometimes hesitate to request emergency medical assistance because they are concerned about potential disciplinary consequences associated with alcohol or other drug use.

The health and safety of students is the College's priority.

The Washington College Medical Amnesty Policy is intended to encourage students to promptly seek medical assistance for themselves or others experiencing an alcohol- or drug-related emergency.

When an individual actively seeks medical assistance for themselves or another student, the College may reduce or eliminate certain disciplinary consequences associated with

alcohol or drug possession or consumption, consistent with the requirements and limitations of the Medical Amnesty Policy.

Students should never allow fear of disciplinary action to prevent them from calling for help during a medical emergency.

Medical Amnesty does not necessarily prevent action related to other serious misconduct occurring during the same incident and does not excuse repeated or flagrant violations of College policy.

Students receiving Medical Amnesty may be required to participate in appropriate educational, wellness, counseling, or other follow-up services.

Call for Help

An active request for assistance may include contacting:

- 911;
- Washington College Campus Police at 410-778-7810;
- A Resident Assistant;
- Another appropriate College official; or
- Emergency medical personnel.

When someone's health or safety may be at risk, call for help immediately.

Parent or Guardian Notification

Consistent with applicable law and College policy, Washington College may notify a parent or legal guardian of a student under the age of 21 following certain violations of the College's alcohol or drug policies.

Decisions regarding notification are made by appropriate College officials based upon the circumstances, applicable privacy requirements, and concern for the student's health and well-being.

Prevention, Education, and Intervention

Washington College recognizes that prevention and education are important components of reducing alcohol- and drug-related harm.

The College provides or supports educational and intervention efforts addressing topics such as:

- Responsible decision-making;
- Alcohol and drug awareness;
- Risks associated with excessive alcohol consumption;
- Recognition of alcohol poisoning;
- Opioid overdose recognition and response;
- Naloxone awareness;
- Risks associated with mixing alcohol, prescription medications, or other substances;
- Substance misuse and dependency;
- Medical Amnesty;
- Available counseling and treatment resources; and
- When and how to request emergency medical assistance.

Campus Police, Health Services, Counseling Services, Student Affairs, and other appropriate College departments may participate in prevention, education, intervention, and referral efforts.

Health Risks Associated with Alcohol and Other Drugs

Alcohol and other drug use can create significant physical, psychological, academic, and behavioral consequences.

Alcohol consumption may impair:

- Judgment;
- Coordination;
- Reaction time;

- Memory;
- Decision-making; and
- An individual's ability to recognize or respond appropriately to dangerous situations.

High levels of alcohol consumption can result in unconsciousness, respiratory depression, alcohol poisoning, serious injury, and death.

Combining alcohol with prescription medications, opioids, sedatives, or other drugs can substantially increase the risk of overdose and other serious medical complications.

Repeated substance use may also contribute to dependency, withdrawal symptoms, academic difficulties, relationship problems, behavioral concerns, and long-term health consequences.

Individuals concerned about their own substance use or the substance use of another person are encouraged to seek assistance.

Smoking and Vaping

Washington College maintains restrictions concerning smoking, vaping, and the use of tobacco or inhalation products.

College buildings and vehicles are designated as smoke-free. Smoking and vaping are prohibited inside College buildings and in other areas identified by College policy.

The prohibition includes products and devices such as:

- Cigarettes;
- Cigars and cigarillos;
- Electronic cigarettes;
- Vaping devices;
- Juuls or similar devices;
- Pipes;
- Smokeless tobacco products; and
- Other products covered by the College's smoking and vaping policy.

All residence halls are smoke-free.

Students should consult the current Washington College Student Handbook for complete information concerning designated smoking areas and other restrictions.

Alcohol and Drug Policy Violations

Washington College's response to alcohol and other drug violations depends upon the nature, severity, frequency, and circumstances of the conduct.

Potential College responses may include:

- Educational conversations or interventions;
- Written warnings;
- Fines;
- Required educational programming;
- Substance use assessment;
- Counseling or wellness referrals;
- Probation;
- Housing-related restrictions or changes;
- Restrictions from certain College activities or facilities;
- Parent or guardian notification when permitted by law and College policy;
- Suspension;
- Expulsion; and
- Other appropriate educational or disciplinary measures.

The College may consider aggravating and mitigating circumstances, prior conduct history, student safety, and the educational needs of the student when determining an appropriate response.

Conduct that may constitute a violation of federal, state, or local criminal law may also be referred to Washington College Campus Police or another appropriate allied law enforcement agency.

Counseling, Treatment, and Support Resources

Washington College encourages students experiencing concerns related to alcohol or other substance use to seek assistance.

On-Campus Resources

Washington College Health and Counseling Services
410-778-7261

Students may also be referred to appropriate community-based treatment, counseling, recovery, or support resources based upon their individual needs.

Services may include prevention education, assessment, counseling, referral, peer support, and other wellness resources.

Seeking assistance early can help prevent substance-related concerns from becoming more serious.

Emergency Assistance

An alcohol or drug-related medical emergency should be treated as a medical emergency, not simply a disciplinary matter.

Immediately call 911 when someone:

- Cannot be awakened;
- Is unconscious or severely confused;
- Has difficulty breathing;
- Has slow, shallow, irregular, or stopped breathing;
- Is experiencing seizures;
- Is repeatedly vomiting while unconscious or semi-conscious;
- Has pale, blue, gray, cold, or clammy skin;
- May have suffered a head injury;
- May have consumed multiple drugs or mixed drugs with alcohol; or
- Exhibits any other symptoms that cause concern for their immediate safety.

Also notify:

Washington College Campus Police
410-778-7810

Stay with the individual until emergency personnel arrive unless remaining with the person would place you in danger.

When in doubt, call for help.

Additional Information

This section provides a summary of Washington College's alcohol and other drug policies and resources. It is not intended to reproduce every provision, definition, procedure, or potential sanction contained within College policies.

Students should consult the current Washington College Student Handbook for the complete Alcohol and Other Drugs policies, including applicable expectations, prohibited conduct, Medical Amnesty provisions, disciplinary procedures, potential sanctions, prevention and education information, and available resources.

Because College policies may be updated, the current Student Handbook should be consulted for the most up-to-date information.

Hazing Policy, Reporting, Prevention and Awareness

Anti-Hazing Policy

The basis of this anti-hazing policy is to enhance the growth and development of our students who are joining an organization or student group that require a new member education period of several weeks. The procedures set forth by this policy are intended to assure that requirements for prospective members during their new member period contribute to the development of the individual and organization.

Washington College prohibits any form of hazing by Washington College students on or off campus. Hazing can apply to individuals as well as student groups and is defined by Washington College as:

Any action taken, created, or intended, to produce mental or physical discomfort, embarrassment, harassment, or ridicule that is directed at new or prospective members of a recognized student organization. Such actions may be perpetrated by an individual, an individual against an organization, or an organization against an individual. In case of violations, individuals and an organization as a whole may be subject to disciplinary action. In addition to Washington College's Anti-Hazing policy, students must comply with the Maryland Anti-Hazing law.

Maryland Anti-Hazing Law (§ 3-607)

The State of Maryland also prohibits hazing and defines it as such:

Prohibited—A person may not recklessly or intentionally do an act or create a situation that subjects a student to the risk of serious bodily injury or mental or emotional distress for the purpose of initiation into a student organization of a school, college, or university.

Penalty—A person who violates this section is guilty of a misdemeanor and, on conviction, is subject to imprisonment not exceeding 9 months or a fine not exceeding $2,500 or both.

Prohibited defense—The implied or expressed consent of a student to hazing is not a defense under this section.

The College's anti-hazing policies apply to any and all student groups and organizations on campus. The consent of those being hazed will not be accepted as a defense for those who have been found to violate College policies on hazing.

Examples of Hazing

Note that this list is not intended to be all-inclusive. Please contact the Office of Student Affairs (ext. 7752) for clarification on any action that may be considered hazing.

Physical Hazing

- Causing excessive physical fatigue through physical and psychological shocks
- Forcing, requiring, or endorsing calisthenics, such as sit-ups, push-ups or running
- Forcing, requiring, or endorsing participation in study halls for new members
- Conducting a new member-related activity between the hours of midnight and 7:00 a.m. or awakening individuals during these hours
- Forcing, requiring, or endorsing less than seven (7) continuous hours of sleep for associates/pledges/new members each night
- Any 24/7 activity that requires constant monitoring
- Pushing, shoving, tackling, paddle swats, or any other act which may cause harm
- Forcing, requiring, or endorsing pledges/associate members/new members to purchase or consume alcohol, drugs, food, or any other substance
- Dropping food (e.g., eggs, grapes, liver, etc.) into mouths
- Forcing, requiring, or endorsing branding, scarring, or tattooing
- Throwing anything (whipped cream, garbage, water, paint, etc.) at or on an individual
- Forcing, requiring, or endorsing theft of any personal property under any circumstances
- Assigning or endorsing "pranks" or harassing another organization
- Forcing, requiring, or endorsing the defacing of trees, ground, or buildings on or off campus
- Conducting quests, treasure hunts, scavenger hunts, paddle hunts, big sister/brother or little sister/brother hunts
- Forcing, requiring, or endorsing the carrying of items besides new member guidebook (i.e., porn magazines, candy for initiated members, cigarettes, stuffed animals, rocks, etc.)

Psychological Hazing

- Conducting activities that do not allow adequate time for study during the pledge period
- Yelling and screaming or directing negative comments at associates/pledges/new members
- Deceiving new members prior to the ritual designed to convince an associate/pledge/new member that they will not be initiated or will be hurt
- Forcing, requiring, or endorsing the playing of extremely loud music or music repeated over and over, or any other audible harassment

- Not permitting pledges/associate/new members to talk for periods of time
- Forcing, requiring, or encouraging nudity at any time
- Messing up the house or a room for the associate members/pledges/new members to clean
- Forcing, requiring, or endorsing the running of personal errands (servitude)
- Forcing, requiring, or endorsing engagement in activity that involves compelling an individual or group to remain at a certain place or transporting anyone anywhere, within or outside Chestertown (drop offs, kidnaps, etc.)
- Forcing, requiring, or endorsing engagement in public stunts and shenanigans
- Forcing, requiring, or endorsing shaving of head or body hair
- Forcing, requiring or encouraging pledges/associate members/new members to interview older members and take notes
- Wearing apparel that is conspicuous and not "normally" in good taste

Reporting an Incident of Hazing

You may report hazing allegations online or by contacting any of the staff members below:

Sarah Feyerherm, Vice President for Student Affairs, ext. 7752

Gregory Krikorian, Dean of Students/Title IX Coordinator, ext. 7752

Tricia Biles, Assistant Dean for Student Engagement and Success, ext. 7752

Ryan Colman, Chief of Campus Police, Executive Director of Public Safety, ext. 7810

Responsibilities of Individual Students Regarding Hazing

All individual students have a responsibility to decline to participate in hazing activities and report hazing activities if they become aware of them.

College Response to Allegations of Hazing

Any individual student or student group found responsible for hazing or participating in hazing activities is subject to disciplinary action by the College as well as possible criminal prosecution under Maryland State Law.

Any allegations of hazing reported to the College will be investigated. If the investigation yields evidence of hazing, the College will then take appropriate disciplinary action against the individuals and/or organizations deemed responsible for the hazing. The Honor Board may hear charges against organizations and individuals. Disciplinary action may include both accountability sanctions (e.g., fines, loss of privileges, disciplinary probation, suspension or expulsion of the organization, loss of College housing) and educational sanctions (e.g., programs, workshops, community service).

Any retaliatory measures taken against a student who reports a hazing incident are prohibited and may result in additional sanctions taken against the group or individual responsible.

The College will also support any victim of hazing if they want to speak to the local police about the possibility of pressing criminal charges.

New Member Education Programs in Relation to Hazing

It is assumed that once a student organization submits all Anti-Hazing Compliance Forms there is a clear understanding of the Anti-Hazing Policy and therefore New Member Education Programs will not include any form of hazing.

A suggested format for a new member education program should include the following:

- Goals and objectives
- Organization of the new member class (e.g. meetings, officers, length of program)
- Advisor and Alumni role in the program
- Scholarship Development
- Leadership Development
- Campus Community Service
- Education about traditions and purpose of the organization
- Getting to know members
- Social activities

All activities of a new member education program should be positive in nature. Each organization should ask if their activities and behaviors could be publicly justified to College officials. If they cannot, other alternatives should be considered.

Student organizations are encouraged to consult with their National/International Headquarters, the Director of Student Engagement, and/or the Assistant Dean of Student Engagement & Success.

In addition, this consultation is also encouraged if there are any questions regarding activities which might be in potential violation of the Anti-Hazing Policy.

Policy Implementation

All student organizations that have a new member education period are required to inform members, new members, associate members and affiliates of the Anti-Hazing Policy at the first meeting of the new member education period. This responsibility is directly charged to the President and other appropriate executive officers of the organization. At this meeting, each member must receive a copy of the written document.

At the same first meeting of the new member education period, all those students affiliating must complete a “Anti-Hazing Compliance Form”. In addition, the officers and current members of the student organization must also complete a “Anti-Hazing Compliance Form”, (See the Director of Student Engagement for these forms). These forms must be forwarded to the Office for Student Engagement in Hodson Hall within three (3) days after the commencement of the new member education period for each semester in which the organization has such activities, to certify recognition of and compliance with the College’s Anti-Hazing Policy. If an organization has a second new member education period in a semester, arrangements are to be made with the Director of Student Engagement to certify the organization’s compliance with the Anti- Hazing Policy.

Failure to file the Compliance Forms may result in possible judicial action as outlined in the Anti-Hazing Policy.

ANNUAL CRIME STATISTICS

In accordance with the Jeanne Clery Campus Safety Act, Washington College publishes annual crime statistics for the three most recent calendar years. These statistics reflect Clery Act crimes reported to Washington College Campus Police, Campus Security Authorities (CSAs), and applicable local law enforcement agencies.

The following tables provide crime statistics for incidents occurring within Washington College's Clery geography, including on-campus property, on-campus student housing facilities, non-campus property, and public property, as applicable.

WASHINGTON COLLEGE – CLERY CRIME STATISTICS

Offense Type	ON CAMPUS						NON-CAMPUS PROPERTY			PUBLIC PROPERTY		
	2023		2024		2025							
	Total On Campus	Residential Facilities	Total On Campus	Residential Facilities	Total On Campus	Residential Facilities	2023	2024	2025	2023	2024	2025
Murder & Non-Negligent Manslaughter	0	0	0	0	0	0	0	0	0	0	0	0
Manslaughter by Negligence	0	0	0	0	0	0	0	0	0	0	0	0
Rape	1	1	0	0	1	1	0	0	0	0	0	0
Fondling	2	2	2	2	1	1	0	0	0	0	0	0
Incest	0	0	0	0	0	0	0	0	0	0	0	0
Statutory Rape	0	0	0	0	0	0	0	0	0	0	0	0
Robbery	0	0	0	0	0	0	0	0	0	0	0	2
Aggravated Assault	2	1	1	1	0	0	0	0	0	0	0	0
Burglary	0	0	0	0	0	0	0	0	0	0	0	0
Motor Vehicle Theft	2	0	1	0	0	0	0	0	0	0	0	0
Arson	0	0	0	0	0	0	0	0	0	0	0	0
Domestic Violence	1	1	0	0	0	0	0	0	0	0	0	0
Dating Violence	1	0	1	0	0	0	0	0	0	0	0	0
Stalking	0	0	0	0	1	0	0	0	0	0	0	0
Hate Crimes	0	0	0	0	0	0	0	0	0	0	0	0

WASHINGTON COLLEGE – CLERY CRIME STATISTICS

Offense Type	ON CAMPUS						NON-CAMPUS PROPERTY			PUBLIC PROPERTY		
	2023		2024		2025							
	Total On Campus	Residential Facilities	Total On Campus	Residential Facilities	Total On Campus	Residential Facilities	2023	2024	2025	2023	2024	2025
Liquor Law Violation Arrests	0	0	0	0	0	0	0	0	0	0	0	0
Liquor Law Violation Referrals	18	17	50	40	8	6	0	0	0	0	0	0
Drug- Related Arrests	0	0	0	0	0	0	0	0	0	0	0	0
Drug- Related Referrals	0	0	2	2	0	0	0	0	0	0	0	0
Illegal Weapons Possession Arrests	0	0	0	0	0	0	0	0	0	0	0	0
Illegal Weapons Possession Referrals	0	0	0	0	0	0	0	0	0	0	0	0

Reporting Locations

For Clery Act reporting purposes, crime statistics are categorized by the location where the incident occurred:

On-Campus Property: Buildings or property owned or controlled by Washington College within its reasonably contiguous campus area and used in support of the College's educational purposes, including residence halls.

Non-campus Property: Buildings or property owned or controlled by Washington College, or by an officially recognized student organization, that are used for educational purposes but are not within the College's reasonably contiguous campus area.

Public Property: Public property immediately adjacent to and accessible from campus, including streets, sidewalks, thoroughfares, and parking facilities.

Crime Definitions

Murder/Non-Negligent Manslaughter: The willful killing of one person by another.

Manslaughter by Negligence: The killing of another person through gross negligence.

Sexual Assault: Any offense meeting the definition of rape, fondling, incest, or statutory rape.

- **Rape:** Penetration, no matter how slight, without the victim's consent.
- **Fondling:** Touching another person's private parts for sexual gratification without consent.
- **Incest:** Sexual intercourse between persons related within degrees where marriage is prohibited by law.
- **Statutory Rape:** Sexual intercourse with a person under the statutory age of consent.

Robbery: Taking or attempting to take property from another person through force, threat of force, violence, or fear.

Aggravated Assault: An unlawful attack intended to cause severe or aggravated bodily injury, typically involving a weapon or means capable of causing serious injury.

Burglary: Unlawful entry into a structure with the intent to commit a felony or theft.

Motor Vehicle Theft: The theft or attempted theft of a motor vehicle.

Arson: The willful or malicious burning, or attempted burning, of property.

Weapons Law Violations: Violations of laws regulating the manufacture, sale, possession, carrying, or furnishing of weapons.

Drug Law Violations: Violations of laws relating to the unlawful possession, sale, use, cultivation, manufacture, or distribution of controlled substances.

Liquor Law Violations: Violations of laws governing the manufacture, sale, transportation, furnishing, or possession of alcoholic beverages. Drunkenness and driving under the influence are not included.

Hate Crimes: Certain criminal offenses in which evidence indicates the victim was intentionally selected because of an actual or perceived protected characteristic.

Domestic Violence: A felony or misdemeanor crime of violence committed by a current or former spouse or intimate partner, co-parent, cohabitant, similarly situated person, or other person covered by applicable domestic or family violence laws.

Dating Violence: Violence committed by a person who is or has been in a romantic or intimate relationship with the victim. Dating violence includes sexual or physical abuse, or threats of such abuse, but does not include acts classified as domestic violence.

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

CAMPUS FIRE SAFETY ANNUAL COMPLIANCE REPORT

Overview

The Higher Education Opportunity Act (Public Law 110-315) requires institutions with on-campus student housing to publish an annual fire safety report containing information regarding campus fire safety practices, policies, procedures, and fire statistics. This section provides the required fire safety information for Washington College.

Fire Log

Washington College Campus Police maintains a fire log documenting reported fires occurring in on-campus student housing facilities. The log includes the nature, date, time, and general location of each fire, along with any reported injuries, deaths, and property damage.

The fire log is available for review during normal business hours, Monday through Friday, 8:00 a.m. to 4:00 p.m., at the Campus Police Office located in the lower level of Cullen Hall.

Fire Safety in Student Housing

Most Washington College residence halls are protected by automatic sprinkler and fire alarm systems. Campus Police operates 24 hours a day, seven days a week and responds to and investigates reported fire alarms.

Residence halls are equipped with emergency backup lighting. Fire protection and detection systems and related equipment are inspected and serviced by certified vendors in accordance with applicable requirements.

Students and residence hall staff receive fire safety information, and unannounced fire drills are conducted in residence halls at least once each semester.

Residence Hall Fire Safety Policies

Students must evacuate residence halls whenever a fire alarm sounds or when directed by College personnel or emergency responders. Failure to evacuate may constitute a violation of College policy.

Tampering with fire alarms, smoke detectors, fire extinguishers, or other fire safety equipment is prohibited. Stairwells, corridors, exits, and other means of egress must remain clear of bicycles, personal property, and other obstructions.

Residence hall furnishings and appliances must comply with applicable fire safety requirements. Personal furniture, mattresses, appliances, or other items that create a fire hazard may be prohibited or removed.

Smoking

All Washington College buildings and vehicles are smoke-free. Smoking or other activities involving smoke or vapors are prohibited in accordance with College policy.

Room Inspections

Residence hall rooms and common areas may be periodically inspected by the State Fire Marshal, Campus Police, Buildings and Grounds, and Residential Life to identify and address potential fire and life-safety hazards.

Fire Reporting and Evacuation Procedures

Members of the Washington College community should become familiar with at least two evacuation routes from buildings in which they live, work, or attend classes and should know the locations of emergency exits and fire alarm pull stations.

When a fire alarm sounds, occupants must immediately evacuate the building.

If smoke or fire is discovered:

- Activate the nearest fire alarm pull station and warn others in the immediate area.
- Call **911** and notify Washington College Campus Police at **410-778-7810**.
- Evacuate using the nearest safe exit and close doors behind you when possible.
- Do not use elevators during a fire emergency.
- Only attempt to use a fire extinguisher if you have been trained, the fire is small, and it is safe to do so.
- Once outside, move away from the building and remain at a safe location.
- Do not re-enter the building until authorized by the Fire Department or Campus Police.

All fires must be reported to Campus Police, including fires that have already been extinguished or evidence of a previously unreported fire. Campus Police will document reported fires and assist responding fire officials and the Fire Marshal with investigations as appropriate.

For purposes of the College's annual fire statistics, students and employees should report any fire occurring in an on-campus student housing facility to Washington College Campus Police at 410-778-7810.

Washington College's primary campus address is 300 Washington Avenue, Chestertown, Maryland 21620.

Year	Residential Facility	# of Fires	Fire Date	Cause	Injuries	Deaths	Property Damage
2025	Queen Anne	0			0	0	$0.00
2025	Caroline	0			0	0	$0.00
2025	Reid	0			0	0	$0.00
2025	Minta Martin	0			0	0	$0.00
2025	Cullen	0			0	0	$0.00
2025	West	0			0	0	$0.00
2025	Middle	0			0	0	$0.00
2025	Cecil	0			0	0	$0.00
2025	Talbot	0			0	0	$0.00
2025	Dorchester	0			0	0	$0.00
2025	Harford	0			0	0	$0.00
2025	Sassafras	0			0	0	$0.00
2025	Chester	0			0	0	$0.00
2025	Montgomery	0			0	0	$0.00
2025	Howard	0			0	0	$0.00
2025	Carroll	0			0	0	$0.00
2025	Frederick	0			0	0	$0.00
2025	Alleghany	0			0	0	$0.00
2025	Garrett	0			0	0	$0.00
2025	Anne Arundel	0			0	0	$0.00
2025	Calvert	0			0	0	$0.00
2025	St. Mary's	0			0	0	$0.00
2025	Prince Georges	0			0	0	$0.00
2025	Charles	0			0	0	$0.00
2025	Kent	0			0	0	$0.00
2025	Corsica	0			0	0	$0.00

Residential Facility	Sprinklers	Fire Extinguishers	Other Extinguishing Devices	Fire Detection Devices	Stand-Alone Smoke Alarms	Other Alert Devices	Fire Doors	Fire Walls
Queen Anne	X	X		X	X	X	x	x
Caroline	X	X		X	X	X	x	x
Reid	X	X	X - Standpipe	X	X	X	x	x
Minta Martin	X	X	X - Standpipe	X	X	X	x	x
West	X	X	X - Standpipe	X	X	X	x	x
Middle	X	X	X - Standpipe	X	X	X	x	x
Cullen	X	X	X - Standpipe	X	X	X	x	x
Cecil	X	X		X	X	X	x	x
Talbot	X	X		X	X	X	x	x
Dorchester	X	X		X	X	X	x	x
Harford	X	X		X	X	X	x	x
Sassafras	X	X	X - Standpipe	X	X	X	x	x
Chester	X	X	X - Standpipe	X	X	X	x	x
Montgomery	X	X		X	X	X	x	x
Howard	X	X		X	X	X	x	x
Carroll	X	X		X	X	X	x	x
Frederick	X	X		X	X	X	x	x
Alleghany	X	X		X	X	X	x	x
Garrett	X	X		X	X	X	x	x
Anne Arundel	X	X		X	X	X	x	x
Calvert	X	X		X	X	X	x	x
St. Mary's	X	X		X	X	X	x	x
Prince George	X	X		X	X	X	x	x
Charles	X	X		X	X	X	x	x
Kent	X	X		X	X	X	x	x
Corsica	X	X	X - Standpipe	X	X	X	x	x

ASR FIRE STATISTICS — 3-YEAR SUMMARY

Year	Total Fires	Injuries	Deaths	Property Damage	Facilities With Fires
2025	0	0	0	$0.00	None
2024	2	1	0	$13,624.30	Sassafras; Carroll
2023	0	0	0	$0.00	None

2025 Fire Details

CAMPUS MAP

Washington College
WILDFLOWER MEADOW
To High Street
Future Home of the Innovation Plant
CHESTERTOWN RAIL TRAIL
To Kent Crossing Apartments
SHRIVER FIELD
Schottland Tennis Pavilion
Corsica Hall
Chester Hall
Thomas E. Morris Hall
Sassafras Hall
Western Shore Residence Halls
Roy Kirby Jr. Stadium
KIBLER FIELD
ATHEY PARK
CAMPUS GARDEN
508
510
Johnson Fitness Center
Cain Athletic Center
Casey Swim Center
LOT B
Gibson Center for the Arts
LOT C
Casey Academic Center
Fire Pit
Future Home of the Warehime School of Business
LOT D
Larrabee Arts Center
Building & Grounds
LOT A
Goldstein Hall
Daly Hall
Martha Washington Square
NORTH COLLEGE AVENUE
213
Rebecca Corbin Loree Center – Career Development
Hynson Lounge
Cullen Hall
Public Safety
The Adams House
Madison House
Franklin House
Nussbaum House
Brown Cottage
EV Charging
Miller Library
William Smith Hall
West Hall
Middle Hall
East Hall
CATER WALK
Hodson Hall Commons
Kent House
GREENWOOD AVENUE
Bunting Hall
John S. Toll Science Center
Decker Lab
Dunning Hall
Radiant Echo
Foster House
Rose O'Neill Literary House
CAMPUS GREEN
Caroline House
Reid Hall
Hillel House
Minta Martin Hall
Alumni House
WASHINGTON AVENUE
WEST CAMPUS AVENUE
Publications House
BROWN STREET
Queen Anne's House
Health & Counseling Services
Helstein House
TO DOWNTOWN CHESTERTOWN
EAST CAMPUS AVENUE
Cromwell Hall
Academic Buildings
Administrative Buildings
Residence Halls
Resources & Amenities
Bunting Hall
Business Office, Campus Events, Office of the Provost & Dean, President's Office
Caroline House
Residential Life
Cullen Hall
Public Safety
Casey Academic Center
Bookstore, Central Services, Registrar, Student Accounts, Financial Aid, Visitors Center, Office of Admissions
East Hall
Marketing & Communications
Foster House
Global Education Office
Gibson Center for the Arts
1 - Decker Theatre
2 - Hotchkiss Recital Hall
3 - Kohl Gallery
4 - Tawes Theatre
Goldstein Hall
Writing Center
Hodson Hall Commons
Goose Nest, Java George, Office of Student Affairs, Office of Student Engagement, The Egg, Dining Hall
Miller Library
Archives
Office of Academic Skills, MakerSpace, Quantitative Skills Center, Owings Library Terrace
Minta Martin Hall
Office of Intercultural Affairs
Rebecca Corbin Loree Center
Center for Career Development
William Smith Hall
HelpDesk, Norman James Theatre
Western Shore Residence Halls
5 - Montgomery House
6 - Howard House
7 - Carroll House
8 - Frederick House
9 - Allegany House
10 - Garrett House
11 - Anne Arundel House
12 - Calvert House
13 - St. Mary's House
14 - Charles House
15 - Prince George's House