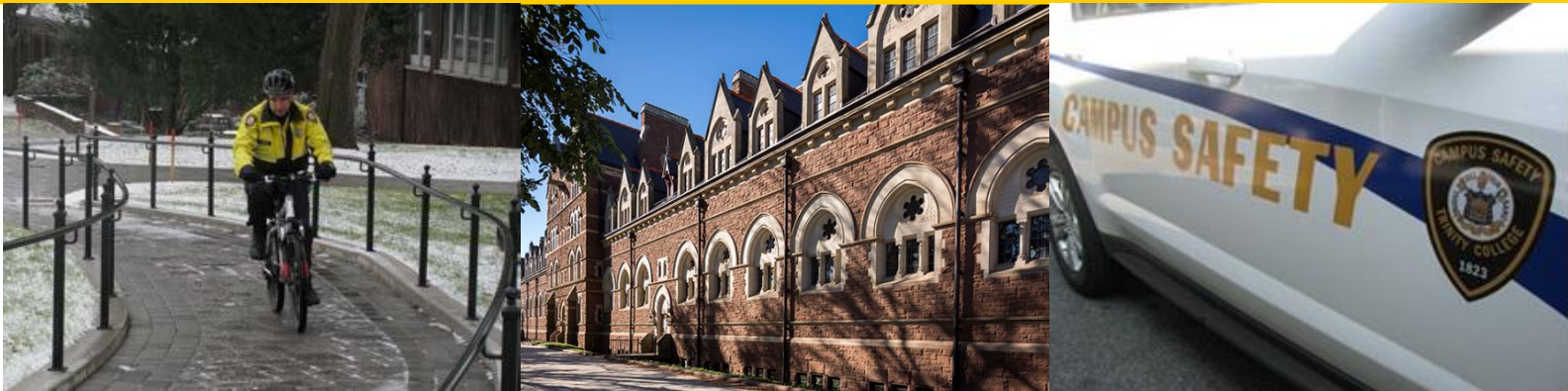




# Trinity College

HARTFORD CONNECTICUT

## *ANNUAL SECURITY REPORT ANNUAL FIRE SAFETY REPORT Statistics for 2016, 2017, and 2018*



OCTOBER 1, 2019

## ***THE DEPARTMENT OF CAMPUS SAFETY***

The mission of the Campus Safety Department is to promote and provide a safe, secure environment where members of the Trinity community can live, study, and work. The department strives to provide effective safety services, prevent crime, and foster an atmosphere in which members of the College community practice personal safety.

Trinity's Department of Campus Safety, reporting to the Dean of Campus Life and Vice President for Student Affairs, is charged with coordinating the College's efforts to provide a safe and well-ordered campus. Campus Safety Officers, Captain, Sergeants, Dispatchers, and administrative staff make up this service-oriented department; their work is supplemented by security personnel at the Ferris Athletic Center and contractual security provided by Securitas Security Services. Campus Safety Officers have received formal security or police training.

The Campus Safety Department also coordinates shuttle and vehicle escort services when school is in session. The shuttle service operates on a scheduled campus route and within designated off-campus areas between 6:00 p.m. and 2:00 a.m. on weeknights, and until 4:00 a.m. on weekend nights. Campus Safety Officers provide walking escorts.

Shuttle drivers are equipped with radios and have direct communication with the Campus Safety office.

## ***CAMPUS LAW ENFORCEMENT POLICIES***

### **CAMPUS SAFETY DEPARTMENT**

Campus Safety Officers do not possess arrest powers, do not carry firearms, and may carry only defensive equipment, including handcuffs and a pepper-based spray. All incidents involving students are referred to the Dean of Students Office.

Incidents involving faculty and staff are referred to either the Dean of the Faculty or Human Resources. Criminal incidents are referred to the local police, who have jurisdiction on and off the campus. The Campus Safety Department at Trinity College maintains a highly professional working relationship with the Hartford Police Department (HPD), and the College provides a facility on campus for the use of HPD as a substation. Campus Safety Officers routinely communicate with HPD officers regarding incidents and related investigations and call for assistance from HPD whenever necessary. There is no written memorandum of understanding between Campus Safety and HPD. Trinity College Campus Safety Officers have the authority to enforce Trinity College policy by issuing parking tickets, which are billed to financial accounts of students, faculty, and staff, and by authorizing the towing of vehicles parked in violation of policy.

## ***SECURITY AWARENESS PROGRAMS***

A variety of security awareness programs are provided by Trinity's Campus Safety Department. During September, Resident Advisers and other student leaders attend mandatory presentations by Campus Safety staff regarding campus security procedures and crime prevention tips. Orientation sessions provide details about services such as the 24-hour security walking escort service, nighttime on-campus shuttle rides, and the nighttime shuttle service that travels on and off campus. In addition, information is provided on the TrinALERT emergency notification system and the 101 emergency call boxes located throughout campus. Campus Safety brochures with security information and key phone

numbers are distributed at student sessions and made available at numerous locations on campus.

Throughout the year, Campus Safety makes safety and security presentations at Orientation and Pre-Orientation, Family Weekend, and the Health Benefits Fair and Wellness Fair for Trinity employees and as requested. During these sessions, officials from the Campus Safety Department provide an overview of campus safety and details about security services, thus enabling families, students, and faculty and staff to meet Campus Safety personnel and ask questions.

The Campus Safety website, the *Student Handbook*, and periodic e-mails to the campus community also provide safety awareness information, reminders, and updates on topics such as:

- Avoiding identity theft
- Personal and property safety
- Handling suspicious mail
- Pedestrian safety tips

### ***REPORTING CRIMES OR EMERGENCIES***

#### **IMPORTANT PHONE NUMBERS**

<b>Division</b>	<b>Number</b>
Ambulance	911 (9-911 from an on-campus phone)
Campus Safety (emergency)	(860) 297-2222
Campus Safety (routine)	(860) 297-3333
Hartford Fire Department (emergency)	911 (9-911 from an on-campus phone)
Hartford Police Department (emergency)	911 (9-911 from an on-campus phone)
Hartford Police Department (routine)	(860) 757-4000
Trinity Health Center	(860) 297-2018

**All members of the Trinity College community are encouraged to accurately and promptly report all crimes to the Campus Safety Department and to the appropriate law enforcement agency.**

The Campus Safety Department, located at 76 Vernon Street, is open 24 hours a day, 365 days a year. From College telephones, including those in the residence halls, the number for emergency calls is extension 2222. Outside callers must dial (860) 297-2222. Non-emergency information, including shuttle and escort services, is available by calling extension 3333, or (860) 297-3333 from non-College telephones. Activating any of the 101 yellow emergency call boxes located across campus also makes emergency contact with the Campus Safety Department.

A dispatcher who has radio contact with the Campus Safety Officers receives all calls. The dispatcher is trained to take action appropriate to the circumstances, including sending Campus Safety Officers or other emergency personnel to the location of a complaint or incident.

The 911 emergency system is also available, but must be preceded by a “9” when dialed from a College phone. Calling 911 will connect the caller with the Hartford emergency services dispatcher, not the Campus Safety Department. For police non-emergencies, callers should use the Hartford Police Department’s non-emergency number: (860) 757-4000.

All incidents reported to Campus Safety, including those that occur at off-campus locations occupied by recognized student organizations, are documented and recorded in accordance with state and federal requirements. Campus Safety encourages all complainants to report crimes perpetrated against them to HPD and/or any other appropriate city, state, or federal law enforcement agency. The College coordinates its disclosure and reporting of crime statistics with the appropriate law enforcement agencies.

**NON-EMERGENCY / ADMINISTRATIVE LINE (860) 297-3333**

<b>Non-Emergency – Administrative Line (860) 297-3333</b>	<b>Press</b>
<i>To reach Trinity College Campus Safety Department:</i>	
Emergency	0
General Information	1
Transportation Services	2
Parking Information	3
Director of Campus Safety	4
Supervisor’s Office	5

**EMERGENCY CALL BOXES**

Yellow emergency call boxes are located at numerous areas throughout the campus and may be activated by pushing a button. The activated call box will automatically identify the location to Campus Safety, and a blue light on top of the call station will flash, indicating an activated alarm. The caller should give the necessary emergency information to the dispatcher and, if possible, remain at the call box until an officer arrives. There are 101 call boxes on campus, including some inside buildings and some with public access automatic external defibrillators (AEDs).

***VOLUNTARY CONFIDENTIAL REPORTING***

If you are the victim of a crime and do not want to pursue action within the Trinity College disciplinary system or the criminal justice system, you may still want to consider making a confidential report. A confidential report allows you to keep the matter confidential while taking steps to ensure the future safety of yourself and others. With such information, the College can keep an accurate record of the number of incidents; determine where there is a pattern of crime with regard to a particular location, method, or assailant; and alert the campus community to potential danger. Privacy will be protected, but in cases involving sexual misconduct, harassment, stalking, dating violence, domestic violence, or intimate partner violence, the Title IX Coordinator will be notified.

A confidential, anonymous report can be made using the online form available on the Campus Safety website:

<https://www.trincoll.edu/campus-safety/Pages/Anonymous-Reporting.aspx>

You can also speak confidentially to members of the College’s Counseling Center who hold professional licenses or who are supervised by such a person in a clinical capacity, as well as to the College’s ordained chaplains. These individuals are subject to recognized privileges that legally and/or ethically prohibit them from disclosing information provided to them in their professional or ecclesiastic capacities without the permission of the person who disclosed the information. Unlike ordained clergy, whose privilege is absolute in Connecticut, professional counselors may have to disclose confidential information in order to protect life and safety.

## ***ACCESS CONTROL POLICY***

Residence hall security is a combined effort of the Campus Safety Department, the Office of Residential Life, and the residents. Individual room doors are equipped with electronic locks. Exterior residence hall doors remain locked 24 hours a day, and students are urged to keep their room doors closed and locked at all times.

To further enhance residential security, the College has installed heavy-gauge metal security screens in the first-floor windows of most of the residence halls.

During periods of low occupancy, frequent and thorough building checks are performed to ensure the security of vacant residence halls.

Students residing in College housing are responsible for their visitors and guests. College regulations prohibit the disclosure of personal access codes to unauthorized persons. Residents are informed of these and other policies relating to residential security at new student orientation and when they agree to the Residential Contract prior to occupancy. Residential Life staff, Campus Safety Officers, and administrators in the Dean of Students Office enforce the rules and policies relating to residential security.

Ongoing education about residential security issues and practices takes place through residence hall programs and meetings. Campus Safety is also involved in ongoing efforts to increase student awareness through newsletters, publications, and timely warnings sent via e-mail.

## **BUILDINGS AND GROUNDS SECURITY**

The College is dedicated to ensuring the security and safety of its buildings and grounds. Campus Safety and custodial personnel secure academic and administrative buildings each day after classes and business activities have ended. Students are discouraged from studying in remote campus locations; instead, they are urged to use study lounges in residential halls or the library. Some facilities to which access is required after business hours are on card-key access systems for reasons of personal safety and building security.

Campus Safety Officers patrol campus grounds in vehicles, by bicycle and on foot 24 hours a day. Trinity's campus is well lighted, and Campus Safety performs regular checks to ensure that all lights are operating and other safety systems are in place. Fencing around much of the campus helps to promote both personal safety and the security of property.

The Facilities Department maintains College buildings and grounds with a focus on safety and security. Campus Safety works closely with Facilities as Campus Safety Officers are able to identify hazardous conditions during their patrol activities and also while responding to reported safety and security hazards.

Emergencies may necessitate changes or alterations to any posted schedules. Areas that are revealed as problematic have security surveys conducted of them. Campus Safety, Residential Life, and Facilities examine the security survey issues related to landscaping, locks, windows, alarms, lighting, and emergency call boxes for safe operation.

## **ACCESS CONTROL AND SECURITY MANAGEMENT SYSTEMS**

Exterior doors that are equipped with an electronic access control system may be accessed by members of the Trinity community with valid credentials. These door locks utilize a technology known as proximity readers. The Trinity ID card is waved in front of the proximity (“prox”) reader near the door.

All ID card production is on Level A of the Raether Library and Information Technology Center.

## ***ALCOHOL POLICY***

### **CONNECTICUT GENERAL STATUTE 30-89**

This statute makes it illegal for someone who possesses or controls private property, including a dwelling unit, to (1) knowingly permit a minor to illegally possess alcohol in the unit or on the property or (2) fail to make reasonable efforts to stop a minor from possessing alcohol in the unit or on the property when he knows the minor possesses alcohol illegally. The statute makes a first offense an infraction and subsequent offenses subject to up to one year in prison, and/or fines.

The statute makes it illegal for a minor to possess alcohol anywhere, rather than only in public places. Under prior law, the penalty for illegal possession in public places was subject to fines. The statute makes this the penalty for second and subsequent offenses of illegal possession, regardless of location, and makes a first offense an infraction.

Under prior law, the provisions on illegal possession by minors did not apply to a minor who possessed alcohol while accompanied by a parent, guardian, or spouse over age 21. The statute now specifies that it must be the minor’s parent, guardian, or spouse.

The act also specifies that the prohibitions on illegal possession and those against selling, shipping, delivering, or giving alcohol to minors cannot be construed to burden a person's exercise of religion as protected by the state constitution.

### **POSSESSION AND USE OF ALCOHOL**

The College expects students and other members of the community to observe the various laws, statutes, and ordinances that govern the provision of alcohol in Connecticut and in Hartford. Connecticut law prohibits the purchase and possession of alcoholic beverages by persons less than 21 years of age. No person underage may purchase or consume alcohol anywhere on campus, including in Greek organization houses and on their grounds. No persons may carry an open container of alcohol in any open spaces on campus. The full policy on alcohol provision and consumption can be found in the *Trinity College Student Handbook* under “Policy on Alcohol and Drugs in Residential Facilities.”

## ***DRUG USE POLICY***

### **POSSESSION AND USE OF CONTROLLED OR ILLICIT SUBSTANCES**

The College expects students and other members of the Trinity College community to observe state and federal laws, statutes, and ordinances that govern the possession and use of controlled substances and narcotics in the State of Connecticut.

### **POLICY ON DRUG USE**

The use and abuse of drugs has become so widespread a danger to society that no college or university can ignore the problem. Certain members of the College staff are available to those in need of confidential counseling and medical assistance regarding drug use. These include but are not limited to the Trinity College Counseling Center, the Women & Gender Resource Action Center, and the Trinity College Health Center. The College strongly encourages the use of these services.

There are, however, other aspects to illegal drug usage and distribution. The College community should be fully informed of the possible consequences. Therefore, the following regulations apply. Members of the community should be aware of the deleterious effects that drugs and the traffic in drugs may have upon the individual and upon the welfare of the academic institution.

### **REGULATIONS**

Students are expected to be aware of and to observe the Connecticut and federal statutes concerning the illegal possession, distribution, sale, manufacture, prescription, and/or administration of those drugs which:

- Contain any quantity of a substance that has been designated as subject to federal controlled substances laws, or,
- Has been designated as a depressant or stimulant drug pursuant to federal food and drug laws, or,
- Has been designated by the Public Health Council and Commissioner of Consumer Protection pursuant to Section 19-451 of the Connecticut General Statutes as having a stimulant, depressant, or hallucinogenic effect upon the higher systems of the central nervous system and a tendency to promote abuse or psychological or physiological dependence or both.

In addition to any prohibition governed by federal or state law, the College prohibits the following behaviors:

- Possession, use, sale, distribution, or manufacture of any narcotic, drug, non-prescribed medication, chemical compound, or other controlled substance; any misuse of prescription medication.
- Possession, use, sale, distribution, or manufacture of drug paraphernalia. Such items are subject to seizure.

Although the College strives to counsel and advise individuals and groups who are having difficulty with drugs, the College may find itself obliged to inform the appropriate public agencies when it has knowledge of unlawful possession, use, sale, manufacture, prescription, or distribution of illegal drugs by a member of the College community.

Students charged with and/or convicted of felonious possession, use, or sale of drugs will be subject to the College's disciplinary procedures.

Nothing in these regulations alters the commitment of the administration and faculty to help those individuals who seek counseling for drug use. The collective goal is a healthy campus community, the achievement of which is severely jeopardized by the use of dangerous drugs and by certain activities related to drug use. The welfare of the Trinity College community depends on frank recognition of the risks involved with drug abuse and continued efforts to find effective means to solve this problem.

Trinity College encourages those who become involved with illegal drug use or abusive use of alcohol to seek assistance from the College's various counseling and medical resources.

### ***POLICY CONCERNING WEAPONS ON CAMPUS***

College regulations prohibit the unauthorized use or possession of weapons such as firearms, air rifles, ammunition, explosives, hand weapons, and fireworks of all kinds by any member of the Trinity community, both on campus and at College functions or events off campus, which are governed by College regulations. The full regulation concerning weapons is published in the *Trinity College Student Handbook*.

### ***ARRESTS OR DISCIPLINARY REFERRALS FOR ILLEGAL WEAPONS POSSESSION AND DRUG AND LIQUOR LAW VIOLATIONS***

In addition to disclosing statistics for specific criminal offenses, the Clery Act requires institutions to disclose both the number of arrests and the number of persons referred for disciplinary action for:

1. Illegal weapons possession;
2. Drug law violations; and
3. Liquor law violations.

**ARREST** for Clery Act purposes is defined as persons processed by arrest, citation, or summons. This includes:

- Those persons arrested and released without a formal charge being placed against them. (An arrest has occurred when a law enforcement officer detains an adult with the intention of seeking charges against the individual for a specific offense(s) and a record is made of the detention.)
- Juveniles taken into custody or arrested but merely warned and released without being charged. A juvenile should be counted as "arrested" when the circumstances are such that if the individual were an adult, an arrest would have been counted.

**REFERRED FOR DISCIPLINARY ACTION** is defined as the referral of any person to any official who initiates a disciplinary action of which a record is kept and which may result in the imposition of a sanction.

**ILLEGAL WEAPONS POSSESSION** is defined as the violation of laws or ordinances prohibiting the manufacture, sale, purchase, transportation, possession, concealment, or use of firearms, cutting instruments, explosives, incendiary devices or other deadly weapons. This classification encompasses weapons offenses that are regulatory in nature. Include in this classification: manufacture, sale, or possession of deadly weapons; carrying deadly weapons, concealed or openly; using, manufacturing, etc., of silencers; furnishing deadly weapons to minors; aliens possessing deadly weapons; and attempts to commit any of the above.

**DRUG LAW VIOLATIONS** are defined as the violation of laws prohibiting the production, distribution and/or use of certain controlled substances and the equipment or devices utilized



in their preparation and/or use. The unlawful cultivation, manufacture, distribution, sale, purchase, use, possession, transportation or importation of any controlled drug or narcotic substance. The relevant substances include: opium or cocaine and their derivatives (morphine, heroin, codeine); marijuana; synthetic narcotics — manufactured narcotics, which can cause true addiction (Demerol, methadone); and dangerous nonnarcotic drugs (barbiturates, Benzedrine).

**LIQUOR LAW VIOLATIONS** are defined as the violation of state or local laws or ordinances prohibiting the manufacture, sale, purchase, transportation, possession or use of alcoholic beverages, not including driving under the influence and drunkenness.

### ***CRIMINAL ACTIVITY OFF CAMPUS***

Criminal activity off campus falls within the jurisdiction of the Hartford Police Department (HPD), and Campus Safety will report any incidents involving students about which it is aware to the Dean of Students Office. Although HPD has primary jurisdiction in all areas off campus, Campus Safety Officers can and do respond to student-related incidents that occur in close proximity to campus. HPD routinely works and communicates with campus officers on any serious incidents occurring on campus or in the immediate neighborhood and business areas surrounding campus. Campus Safety Officers may assist with an investigation in cooperation with local, state, or federal law enforcement.

For misconduct off campus, students must accept the consequences of action taken against them by civil authority and should not expect the College to intervene on their behalf. The College will not arrange bail or provide legal services to students who are in difficulty with the law but rather will expect students to arrange their own release. The Dean of Students Office, nevertheless, may take disciplinary action against students and officially recognized student organizations with off-campus locations for off-campus misconduct.

### ***CAMPUS SECURITY AUTHORITIES***

The Clery Act requires schools to disclose “statistics concerning the occurrence of certain criminal offenses reported to local law enforcement agencies or any official of the institution who is defined as a ‘Campus Security Authority.’ ”

The law defines a “Campus Security Authority” as: “An official of an institution who has significant responsibility for student and campus activities, including, but not limited to, student housing, student discipline, and campus judicial proceedings.” An example would be a dean of students who oversees student housing, a student center, or student extracurricular activities and has significant responsibility for student and campus activities. Similarly, the director of athletics, team coaches, and faculty advisers to student groups also have significant responsibility for student and campus activities.

The criminal offenses for which we are required to disclose statistics are murder/non-negligent manslaughter, manslaughter by negligence, sex offenses (forcible and non-forcible), robbery, aggravated assault, burglary, motor vehicle theft, arson, liquor law violations, drug abuse violations, weapons violations (carrying, possessing), domestic/dating violence, and stalking.

We are also required to report statistics for bias-related (hate) crimes for the following offenses: murder/non-negligent manslaughter, sex offenses (forcible and non-forcible), robbery, aggravated assault, burglary, motor vehicle theft, arson, larceny-theft, vandalism, intimidation, simple assault, and damage/destruction/vandalism of property.

We are required to disclose statistics for offenses that occur on campus, in or on non-campus buildings or property owned or controlled by our school, and non-Trinity property within or immediately adjacent to our campus.

Trinity has a responsibility to notify the campus community about any crimes that pose an ongoing threat to the community, and, as such, campus security authorities are obligated by law to report these crimes. Even if you are not sure whether an ongoing threat exists, immediately contact the Campus Safety Department.

If you have any questions about this request, please contact the Director of Campus Safety at (860) 297-2222.

## ***FEDERAL AND STATE STATUTES RELATING TO SEXUAL OFFENSES***

### **SEX OFFENSES**

Sex Offenses as defined by Federal Statutes:

“Sexual assault” under federal law means an offense that meets the definition of rape, fondling, incest, or statutory rape as used in the FBI’s Uniform Crime Reporting system. A sex offense is any act directed against another person, without the consent of the victim, including instances where the victim is incapable of giving consent.

Rape is defined as the penetration, no matter how slight, of the vagina or anus with any body part or object, or oral penetration by a sex organ of another person, without the consent of the victim.

Fondling is defined as the touching of the private parts of another person for the purposes of sexual gratification, without the consent of the victim, including instances where the victim is incapable of giving consent because of his/her age or because of his/her temporary or permanent mental incapacity.

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

Statutory Rape is defined as non-forcible sexual intercourse with a person who is under the statutory age of consent.

Sex Offenses terminology as defined by the Connecticut General Statutes:

Actor means a person accused of sexual assault.

Sexual intercourse means vaginal intercourse, anal intercourse, fellatio or cunnilingus between persons regardless of sex. Its meaning is limited to persons not married to each other. Penetration, however slight, is sufficient to complete vaginal intercourse, anal intercourse or fellatio and does not require emission of semen. Penetration may be committed by an object manipulated by the actor into the genital or anal opening of the victim’s body.

Sexual contact means any contact with the intimate parts of a person not married to the actor for the purpose of sexual gratification of the actor or for the purpose of degrading or humiliating such person or any contact of the intimate parts of the actor with a person not married to the actor for the purpose of sexual gratification of the actor or for the purpose of degrading or humiliating such person.

Impaired because of mental disability or disease means that a person suffers from a mental disability or disease that renders such person incapable of appraising the nature of such person's conduct.

Mentally incapacitated means that a person is rendered temporarily incapable of appraising or controlling such person's conduct owing to the influence of a drug or intoxicating substance administered to such person without such person's consent, or owing to any other act committed upon such person without such person's consent.

Physically helpless means that a person is (A) unconscious, or (B) for any other reason, is physically unable to resist an act of sexual intercourse or sexual contact or to communicate unwillingness to an act of sexual intercourse or sexual contact.

Use of force means: (A) Use of a dangerous instrument; or (B) use of actual physical force or violence or superior physical strength against the victim.

Intimate parts means the genital area or any substance emitted therefrom, groin, anus or any substance emitted therefrom, inner thighs, buttocks or breasts.

Psychotherapist means a physician, psychologist, nurse, substance abuse counselor, social worker, clergyman, marital and family therapist, mental health service provider, hypnotist or other person, whether or not licensed or certified by the state, who performs or purports to perform psychotherapy.

Psychotherapy means the professional treatment, assessment or counseling of a mental or emotional illness, symptom or condition.

Emotionally dependent means that the nature of the patient's or former patient's emotional condition and the nature of the treatment provided by the psychotherapist are such that the psychotherapist knows or has reason to know that the patient or former patient is unable to withhold consent to sexual contact by or sexual intercourse with the psychotherapist.

Therapeutic deception means a representation by a psychotherapist that sexual contact by or sexual intercourse with the psychotherapist is consistent with or part of the patient's treatment.

School employee means: (A) A teacher, substitute teacher, school administrator, school superintendent, guidance counselor, psychologist, social worker, nurse, physician, school paraprofessional or coach employed by a local or regional board of education or a private elementary, middle or high school or working in a public or private elementary, middle or high school; or (B) any other person who, in the performance of his or her duties, has regular contact with students and who provides services to or on behalf of students enrolled in (i) a public elementary, middle, or high school, pursuant to a contract with the local or regional board of education, or (ii) a private elementary, middle or high school, pursuant to a contract with the supervisory agent of such private school.

Sexual assault in the first degree: Class B or A felony

1. A person is guilty of sexual assault in the first degree when such person (a) compels another person to engage in sexual intercourse by the use of force against such other person or a third person, or by the threat of use of force against such other person or against a third person which reasonably causes such person to fear physical injury to such person or a third person, or (b) engages in sexual intercourse with another person and such other person is under thirteen years of age and the actor is more than two years older than such person, or (c) commits sexual assault in the second degree as provided in section 53a-71 and in the commission of such offense is aided by two or more other persons actually present, or (e) engages in sexual intercourse with another person and such other person is mentally

incapacitated to the extent that such other person is unable to consent to such sexual intercourse.

2. Except as provided in subdivision (2) of this subsection, sexual assault in the first degree is a class B felony for which two years of the sentence imposed may not be suspended or reduced by the court or, if the victim of the offense is under ten years of age, for which ten years of the sentence imposed may not be suspended or reduced by the court.

3. Sexual assault in the first degree is a class A felony if the offense is a violation of subdivision (1) of subsection (a) of this section and the victim of the offense is under sixteen years of age or the offense is a violation of subdivision (2) of subsection (a) of this section. Any person found guilty under said subdivision (1) or (2) shall be sentenced to a term of imprisonment of which ten years of the sentence imposed may not be suspended or reduced by the court if the victim is under ten years of age or of which five years of the sentence imposed may not be suspended or reduced by the court if the victim is under sixteen years of age.

4. Any person found guilty under this section shall be sentenced to a term of imprisonment and a period of special parole pursuant to subsection (b) of section 53a-28 which together constitute a sentence of at least ten years.

Aggravated sexual assault in the first degree: Class B or A felony

(a) A person is guilty of aggravated sexual assault in the first degree when such person commits sexual assault in the first degree as provided in section 53a-70, and in the commission of such offense (1) such person uses or is armed with and threatens the use of or displays or represents by such person's words or conduct that such person possesses a deadly weapon, (2) with intent to disfigure the victim seriously and permanently, or to destroy, amputate or disable permanently a member or organ of the victim's body, such person causes such injury to such victim, (3) under circumstances evincing an extreme indifference to human life such person recklessly engages in conduct which creates a risk of death to the victim, and thereby causes serious physical injury to such victim, or (4) such person is aided by two or more other persons actually present. No person shall be convicted of sexual assault in the first degree and aggravated sexual assault in the first degree upon the same transaction but such person may be charged and prosecuted for both such offenses upon the same information.

(b) Aggravated sexual assault in the first degree is a class B felony or, if the victim of the offense is under sixteen years of age, a class A felony. Any person found guilty under this section shall be sentenced to a term of imprisonment of which five years of the sentence imposed may not be suspended or reduced by the court, except that, if such person committed sexual assault in the first degree by violating subdivision (1) of subsection (a) of section 53a-70, and the victim of the offense is under sixteen years of age, twenty years of the sentence imposed may not be suspended or reduced by the court. Any person found guilty under this section shall be sentenced to a period of special parole pursuant to subsection (b) of section 53a-28 of at least five years.

Sexual assault in spousal or cohabiting relationship: Class B felony

(a) For the purposes of this section:

1. "Sexual intercourse" means vaginal intercourse, anal intercourse, fellatio or cunnilingus between persons regardless of sex. Penetration, however slight, is sufficient to complete vaginal intercourse, anal intercourse or fellatio and does not require emission of semen. Penetration may be committed by an object manipulated by the actor into the genital or anal opening of the victim's body; and

2. "Use of force" means: (A) Use of a dangerous instrument; or (B) use of actual physical force or violence or superior physical strength against the victim.

(b) No spouse or cohabiter shall compel the other spouse or cohabiters to engage in sexual intercourse by the use of force against such other spouse or cohabiter, or by the threat of the use of force against such other spouse or cohabiter which reasonably causes such other spouse or cohabiter to fear physical injury.

(c) Any person who violates any provision of this section shall be guilty of a class B felony.

Aggravated sexual assault of a minor: Class A felony

(a) A person is guilty of aggravated sexual assault of a minor when such person commits a violation of subdivision (2) of subsection (a) of section 53-21 or section 53a-70, 53a-70a, 53a-71, 53a-86, 53a-87 or 53a-196a and the victim of such offense is under thirteen years of age, and (1) such person kidnapped or illegally restrained the victim, (2) such person stalked the victim, (3) such person used violence to commit such offense against the victim, (4) such person caused serious physical injury to or disfigurement of the victim, (5) there was more than one victim of such offense under thirteen years of age, (6) such person was not known to the victim, or (7) such person has previously been convicted of a violent sexual assault.

(b) Aggravated sexual assault of a minor is a class A felony and any person found guilty under this section shall, for a first offense, be sentenced to a term of imprisonment of twenty-five years which may not be suspended or reduced by the court and, for any subsequent offense, be sentenced to a term of imprisonment of fifty years which may not be suspended or reduced by the court.

Sexual assault in the second degree: Class C or B felony

(a) A person is guilty of sexual assault in the second degree when such person engages in sexual intercourse with another person and: (1) Such other person is thirteen years of age or older but under sixteen years of age and the actor is more than three years older than such other person; or (2) such other person is impaired because of mental disability or disease to the extent that such other person is unable to consent to such sexual intercourse; or (3) such other person is physically helpless; or (4) such other person is less than eighteen years old and the actor is such person's guardian or otherwise responsible for the general supervision of such person's welfare; or (5) such other person is in custody of law or detained in a hospital or other institution and the actor has supervisory or disciplinary authority over such other person; or (6) the actor is a psychotherapist and such other person is (A) a patient of the actor and the sexual intercourse occurs during the psychotherapy session, (B) a patient or former patient of the actor and such patient or former patient is emotionally dependent upon the actor, or (C) a patient or former patient of the actor and the sexual intercourse occurs by means of therapeutic deception; or (7) the actor accomplishes the sexual intercourse by means of false representation that the sexual intercourse is for a bona fide medical purpose by a health care professional; or (8) the actor is a school employee and such other person is a student enrolled in a school in which the actor works or a school under the jurisdiction of the local or regional board of education which employs the actor; or (9) the actor is a coach in an athletic activity or a person who provides intensive, ongoing instruction and such other person is a recipient of coaching or instruction from the actor and (A) is a secondary school student and receives such coaching or instruction in a secondary school setting, or (B) is under eighteen years of age; or (10) the actor is twenty years of age or older and stands in a position of power, authority or supervision over such other person by virtue of the actor's professional, legal, occupational or volunteer status and such other person's participation in a program or activity, and such other person is under eighteen years of age; or (11) such other person is placed or receiving services under the direction of the Commissioner of Developmental Services in any public or private facility or program and the actor has supervisory or disciplinary authority over such other person.

(b) Sexual assault in the second degree is a class C felony or, if the victim of the offense is under sixteen years of age, a class B felony, and any person found guilty under this section

shall be sentenced to a term of imprisonment of which nine months of the sentence imposed may not be suspended or reduced by the court.

Sexual assault in the third degree: Class D or C felony

(a) A person is guilty of sexual assault in the third degree when such person (1) compels another person to submit to sexual contact (A) by the use of force against such other person or a third person, or (B) by the threat of use of force against such other person or against a third person, which reasonably causes such other person to fear physical injury to himself or herself or a third person, or (2) engages in sexual intercourse with another person whom the actor knows to be related to him or her within any of the degrees of kindred specified in section 46b-21.(b) Sexual assault in the third degree is a class D felony or, if the victim of the offense is under sixteen years of age, a class C felony.

Sexual assault in the third degree with a firearm: Class C or B felony.

(a) A person is guilty of sexual assault in the third degree with a firearm when such person commits sexual assault in the third degree as provided in section 53a-72a, and in the commission of such offense, such person uses or is armed with and threatens the use of or displays or represents by such person's words or conduct that such person possesses a pistol, revolver, machine gun, rifle, shotgun or other firearm. No person shall be convicted of sexual assault in the third degree and sexual assault in the third degree with a firearm upon the same transaction but such person may be charged and prosecuted for both such offenses upon the same information.

(b) Sexual assault in the third degree with a firearm is a class C felony or, if the victim of the offense is under sixteen years of age, a class B felony, and any person found guilty under this section shall be sentenced to a term of imprisonment of which two years of the sentence imposed may not be suspended or reduced by the court and a period of special parole pursuant to subsection (b) of section 53a-28 which together constitute a sentence of ten years.

Sexual assault in the fourth degree: Class A misdemeanor or Class D felony

(a) A person is guilty of sexual assault in the fourth degree when: (1) Such person subjects another person to sexual contact who is (A) under thirteen years of age and the actor is more than two years older than such other person, or (B) thirteen years of age or older but under fifteen years of age and the actor is more than three years older than such other person, or (C) mentally incapacitated or impaired because of mental disability or disease to the extent that such other person is unable to consent to such sexual contact, or (D) physically helpless, or (E) less than eighteen years old and the actor is such other person's guardian or otherwise responsible for the general supervision of such other person's welfare, or (F) in custody of law or detained in a hospital or other institution and the actor has supervisory or disciplinary authority over such other person; or (2) such person subjects another person to sexual contact without such other person's consent; or (3) such person engages in sexual contact with an animal or dead body; or (4) such person is a psychotherapist and subjects another person to sexual contact who is (A) a patient of the actor and the sexual contact occurs during the psychotherapy session, or (B) a patient or former patient of the actor and such patient or former patient is emotionally dependent upon the actor, or (C) a patient or former patient of the actor and the sexual contact occurs by means of therapeutic deception; or (5) such person subjects another person to sexual contact and accomplishes the sexual contact by means of false representation that the sexual contact is for a bona fide medical purpose by a health care professional; or (6) such person is a school employee and subjects another person to sexual contact who is a student enrolled in a school in which the actor works or a school under the jurisdiction of the local or regional board of education which employs the actor; or (7) such person is a coach in an athletic activity or a person who provides intensive, ongoing instruction and subjects another person to sexual contact who is a recipient of coaching or instruction from the actor and (A) is a secondary school student and receives such coaching or instruction in a secondary school setting, or (B) is under eighteen years of age; or (8) such

person subjects another person to sexual contact and (A) the actor is twenty years of age or older and stands in a position of power, authority or supervision over such other person by virtue of the actor's professional, legal, occupational or volunteer status and such other person's participation in a program or activity, and (B) such other person is under eighteen years of age; or (9) such person subjects another person to sexual contact who is placed or receiving services under the direction of the Commissioner of Developmental Services in any public or private facility or program and the actor has supervisory or disciplinary authority over such other person.

(b) Sexual assault in the fourth degree is a class A misdemeanor or, if the victim of the offense is under sixteen years of age, a class D felony.

#### Domestic Violence

Under federal law, the term "domestic violence" means:

1) Felony or misdemeanor crimes of violence committed

- (i) By a current or former spouse or intimate partner of the victim;
- (ii) By a person with whom the victim shares a child in common;
- (iii) By a person who is cohabitating with or has cohabitated with the victim as a spouse or intimate partner;
- (iv) By a person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction in which the crime of violence occurred; or
- (v) By any other person against an adult or youth victim who is protected from that person's acts under the domestic or family violence laws of the jurisdiction in which the crime of violence occurred.

2) For the purposes of complying with the requirements of this section and section 668.41, any incident meeting this definition is considered a crime for the purposes of Clery Act reporting.

#### Family violence (domestic violence) as defined in the Connecticut General Statutes

1. "Family violence" means an incident resulting in physical harm, bodily injury or assault, or an act of threatened violence that constitutes fear of imminent physical harm, bodily injury or assault, including, but not limited to, stalking or a pattern of threatening, between family or household members. Verbal abuse or argument shall not constitute family violence unless there is present danger and the likelihood that physical violence will occur.

2. "Family or household member" means any of the following persons, regardless of the age of such person: (A) Spouses or former spouses; (B) parents or their children; (C) persons related by blood or marriage; (D) persons other than those persons described in subparagraph (C) of this subdivision presently residing together or who have resided together; (E) persons who have a child in common regardless of whether they are or have been married or have lived together at any time; and (F) persons in, or who have recently been in, a dating relationship.

3. "Family violence crime" means a crime as defined in section 53a-24, other than a delinquent act as defined in section 46b-120, which, in addition to its other elements, contains as an element thereof an act of family violence to a family or household member. "Family violence crime" does not include acts by parents or guardians disciplining minor children unless such acts constitute abuse.

4. "Institutions and services" means peace officers, service providers, mandated reporters of abuse, agencies and departments that provide services to victims and families and services designed to assist victims and families.

Dating Violence: The term "dating violence" under Federal law means violence committed by a person who is or has been in a social relationship of a romantic or intimate nature with the victim.

1) The existence of such a relationship shall be based on the reporting party's statement and with consideration of the length of the relationship, the type of relationship, and the frequency of interaction between the persons involved in the relationship.

2) For the purposes of this definition-

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

(ii) Dating violence does not include acts covered under the definition of domestic violence.

In section 668.41, any incident meeting this definition is considered a crime for the purposes of Clery Act reporting.

Dating violence as defined in the Connecticut General Statutes

1. "Family violence" means an incident resulting in physical harm, bodily injury or assault, or an act of threatened violence that constitutes fear of imminent physical harm, bodily injury or assault, including, but not limited to, stalking or a pattern of threatening, between family or household members. Verbal abuse or argument shall not constitute family violence unless there is present danger and the likelihood that physical violence will occur.

2. "Family or household member" means any of the following persons, regardless of the age of such person: (A) Spouses or former spouses; (B) parents or their children; (C) persons related by blood or marriage; (D) persons other than those persons described in subparagraph (C) of this subdivision presently residing together or who have resided together; (E) persons who have a child in common regardless of whether they are or have been married or have lived together at any time; and (F) persons in, or who have recently been in, a dating relationship.

3. "Family violence crime" means a crime as defined in section 53a-24, other than a delinquent act as defined in section 46b-120, which, in addition to its other elements, contains as an element thereof an act of family violence to a family or household member. "Family violence crime" does not include acts by parents or guardians disciplining minor children unless such acts constitute abuse.

4. "Institutions and services" means peace officers, service providers, mandated reporters of abuse, agencies and departments that provide services to victims and families and services designed to assist victims and families.

Stalking: The term "stalking" under Federal law means 1) Engaging in a course of conduct directed at a specific person that would cause a reasonable person to:

(i) fear for the person's safety or the safety of others; or

(ii) suffer substantial emotional distress.

2) For the purposes of this definition:

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

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

(iii) Reasonable persons means a reasonable person under similar circumstances and with similar identities to the victim.

3) For the purposes of complying with the requirements of this section and section 668.41, any incident meeting this definition is considered a crime for the purposes of Clery Act reporting.



## Stalking as defined in the Connecticut General Statutes

### Stalking in the first degree

(a) A person is guilty of stalking in the first degree when such person commits stalking in the second degree as provided in section 53a-181d, as amended by this act, and (1) such person has previously been convicted of a violation of section 53a-181d, as amended by this act, or (2) such conduct violates a court order in effect at the time of the offense, or (3) the other person is under sixteen years of age.

### Stalking in the second degree: Class A misdemeanor.

(a) For the purposes of this section, “course of conduct” means two or more acts, including, but not limited to, acts in which a person directly, indirectly or through a third party, by any action, method, device or means, (1) follows, lies in wait for, monitors, observes, surveils, threatens, harasses, communicates with or sends unwanted gifts to, a person, or (2) interferes with a person’s property.

(b) A person is guilty of stalking in the second degree when: (1) Such person knowingly engages in a course of conduct directed at a specific person that would cause a reasonable person to fear for such person’s physical safety or the physical safety of a third person; or (2) Such person intentionally, and for no legitimate purpose, engages in a course of conduct directed at a specific person that would cause a reasonable person to fear that such person’s employment, business or career is threatened, where (A) such conduct consists of the actor telephoning to, appearing at or initiating communication or contact at such other person’s place of employment or business, provided the actor was previously and clearly informed to cease such conduct, and (B) such conduct does not consist of constitutionally protected activity.

(c) Stalking in the second degree is a class A misdemeanor.

### Stalking in the third degree

(a) A person is guilty of stalking in the third degree when he recklessly causes another person to reasonably fear for his physical safety by willfully and repeatedly following or lying in wait for such other person.

## ***EDUCATIONAL AND PREVENTION PROGRAMS***

The College provides educational programs and events designed to identify, prevent, and stop sexual violence on campus. New employees are required to attend sexual harassment training. All employees are provided annual training on the College’s Sexual Misconduct Policy and their role as Responsible Employees. First-year students are required to complete:

*Not Anymore* video: a comprehensive overview and education of all forms of sexual misconduct that also includes active bystander instruction

First-Year Orientation performance of Speak About It, featuring skits on consent, healthy relationships, sexual misconduct, and active bystander intervention; following the performance, staff of the Women & Gender Resource Action Center (WGRAC), the Title IX coordinator, and Campus Safety discuss their roles, reporting options, confidentiality levels and on and off-campus resources

The College also provides ongoing training and events that are open to students, faculty, and staff. These programs include:

Sexual Misconduct Overview and Bystander Intervention training: Ongoing required workshops for sophomores organized by WGRAC

The Red Flag Campaign: <http://www.theredflagcampaign.org>: An annual campaign spearheaded by SECS (Students Encouraging Consensual Sex) and WGRAC to educate all campus members about the warning signs of abusive and unhealthy relationships and stalking and to provide active bystander tips

Voices Raised in Power: An annual SECS/WGRAC-sponsored event that celebrates surviving and thriving after incident/s of sexual violence, featuring student performances

Eve Ensler play: *A Memory, A Monologue, A Rant & A Prayer* or *The Vagina Monologues*: An annual SECS/WGRAC performance by students on issues related to sexual misconduct

Take Back the Night: Annual SECS/WGRAC campus-wide event to educate campus on sexual misconduct and bystander intervention and to support survivors

Flyer campaigns and movie nights sponsored by SECS/WGRAC covering issues of healthy relationships, bystander intervention, sexual misconduct, consent, Title IX rights, and resources

The Masculinity Project/WGRAC, hosts Walk A Mile in Her Shoes, an annual program featuring male-identified students walking a mile around the campus in high-heeled shoes, to call attention to the issues of sexual misconduct and victim blaming

The Campaign for Community and WGRAC produced two videos: *Convo on the Long Walk* and *Your Rights, Your Options*, which are updated every two years

## ***BYSTANDER INTERVENTION AND RISK REDUCTION***

Everyone at Trinity has a role to play in preventing sexual misconduct and stalking, and can do something, no matter how small. Bystander intervention is the most effective means of preventing an incident of sexual assault on campus.

### ***Green Dot***

1. Green Dots are actions or behaviors or words that either prevent an incident of sexual misconduct or responds to one, through active bystander intervention
2. Power based personal violence is not tolerated on campus

Bystander intervention involves developing the awareness, skills, and courage needed to intervene in a situation when another individual needs help. Bystander intervention allows individuals to send powerful messages about what is acceptable and expected behavior in our community.

Questions to ask during the situation:

What are my available options?

How can I intervene safely?

Are there others I can call upon for help?

What are the benefits/costs of taking action?

Tips and ABCs:

Intervene at the earliest point possible.

Look for early warning signs of trouble.

Intervening does not necessarily mean confronting.

Ask for help.

Assess for safety. Be with others. Care for the potential victim.

The 3 D's:

Direct: Tell someone directly to halt an action.

Distract: Take someone out of the situation. Engage the person in another situation.

Delegate: Find others to intervene with you or for you.

The following are some strategies to reduce the risk of sexual violence:

Know your sexual intentions and limits. You have the right to say "NO" to any unwanted sexual contact.

Listen to your instincts. If you feel uncomfortable or think you might be at risk, leave the situation immediately and go to a safe place.

Drink responsibly. Know your limits. Drinking increases aggression, decreases comprehension, and decreases inhibition.

Attend large parties with friends you trust. Agree to "look out" for one another. Leave with the group, not alone. Avoid leaving with people that you don't know very well.

## ***WRITTEN EXPLANATION OF RIGHTS, OPTIONS, AND RESOURCES***

The College's Policy on Sexual Misconduct and the *Your Rights, Your Options* booklet serve as written notification to faculty, staff, and students about the existing College and community resources that are available for victims of dating violence, domestic violence, sexual assault, and stalking, whether the incident occurred on campus or off campus. They also serve as written notification of the rights and options available to faculty, staff, and students who have been the victim of dating violence, domestic violence, sexual assault, and stalking whether the incident occurred on campus or off campus.

### ***TRINITY COLLEGE POLICY ON SEXUAL MISCONDUCT***

#### ***Introduction***

Trinity College prohibits sexual discrimination and harassment, including rape, sexual assault, and all other forms of sexual misconduct. In addition, this policy prohibits intimate partner violence, domestic violence, dating violence, stalking, retaliation, and other forms of prohibited conduct, as defined below. For the purposes of this policy, the term "sexual misconduct" includes all of the preceding categories and all forms of nonconsensual sexual contact prohibited by state and federal law. The College takes allegations of sexual misconduct seriously and has established procedures for the reporting and prompt, fair, and impartial adjudication of sexual misconduct complaints, from the initial investigation to the final result. This policy describes the mechanism for reporting and adjudicating allegations of sexual misconduct in all forms. This policy is Trinity College's official policy governing sexual misconduct. It supersedes any other existing policy, and to the extent there is a conflict with other policies, this policy shall prevail. The College reserves the right to amend this policy,

without advance notice, in order to update important information and to ensure the ongoing compliance with applicable laws.

### ***Scope of the Policy***

This policy applies to all College community members, regardless of the sexual orientation, gender expression, or gender identity of the parties involved, including students, faculty, staff, visitors, and independent contractors, as well as those who participate in the College's programs and activities, whether on or off campus, including study-away programs. Any such individual may make a report under this policy. Vendors, independent contractors, visitors, and others who conduct business with the College or on College property are also expected to comply with this policy; complaints against such College affiliates will be handled in accordance with existing contracts and agreements. The College will respond promptly and equitably to all allegations of sexual misconduct involving a College community member and will provide resource options for victims of alleged sexual assault. The College will consider any requests for confidentiality within the context of the College's obligation to provide a safe, nondiscriminatory environment for all community members. Further details on how requests for confidentiality are handled in cases of sexual misconduct may be found in the "Reporting Protocols and Confidentiality" section of this policy. Pursuant to the requirements of Title IX, the College has an independent responsibility to investigate (apart from any separate criminal investigation by law enforcement) and address sexual violence, even in the absence of a complaint by the alleged victim.

### ***Obligation to Report***

In accordance with the mandatory reporting requirements detailed in the "Reporting Protocols and Confidentiality" section below, any Trinity student, faculty member, staff member, or covered third party who has reasonable cause to believe that there has been a violation of this policy should immediately report this information to Campus Safety and to the Title IX Coordinator.

### ***Title IX Coordinator***

The College's Title IX Coordinator may be reached by e-mail [titleixcoordinator@trincoll.edu](mailto:titleixcoordinator@trincoll.edu) or phone at (860) 297-2072. The Title IX Coordinator is responsible for ensuring that Trinity establishes and follows a prompt, thorough, and equitable process for addressing allegations of sexual misconduct and discrimination or differential treatment based on sex. The Title IX Coordinator is responsible for providing leadership and centralized support for compliance with all requirements under Title IX of the Education Amendments Act of 1972 (Title IX), the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act (Clery Act), the Violence Against Women Act (VAWA), and other federal and state laws and regulations pertaining to sex discrimination, harassment, and sexual violence. The Title IX Coordinator serves as the College resource on Title IX requirements and compliance and provides consultation as needed. The Title IX Coordinator is also responsible for creating and implementing complaint and investigation procedures, as well as training programs related to Title IX compliance. See the "Complaint Investigation and Adjudication Process" section of this policy for the Title IX Coordinator's specific duties related to complaints of sexual misconduct. The Title IX Coordinator may designate Deputy Coordinators who will assist in Title IX compliance. Those individuals would have duties and responsibilities similar to the Title IX Coordinator and would report to the Title IX Coordinator. Where the Title IX Coordinator is listed as the designated point of contact for any role in this policy, he or she may designate a Deputy Title IX Coordinator or another qualified member of the College community to assume the role at issue, as necessary and appropriate.

### ***Definitions of Sexual Misconduct***

The following are the definitions of conduct prohibited under this policy. If you have any questions about the definition or application of any of these terms, the policy in general, or the resources available to you as a member of the College community, please contact the Title IX Coordinator or a Deputy Title IX Coordinator.

### **Sexual Harassment**

The College prohibits its employees (including faculty and staff), agents, and students from engaging in sexual harassment. Any such person found responsible for sexual harassment is subject to College disciplinary action (up to and including dismissal) as well as personal legal liability. Sexual harassment, whether opposite or same sex, includes but is not limited to: unwelcome sexual advances, unwelcome requests for sexual favors, and other behavior of a sexual nature or based on a person's sex, whether it occurs on or off campus, when:

- Submission to such conduct is made a condition, explicit or implicit, of an individual's employment or educational opportunities; or
- Submission to or rejection of such conduct is used as a factor in or basis for decisions affecting an individual's employment or educational opportunities; or
- Such conduct has the purpose or effect of unreasonably interfering with an individual's employment or educational opportunities by creating an intimidating, hostile, or offensive educational, living, or work environment.
  - A sex-based hostile environment is created by unwelcome conduct of a sexual nature or based on a person's sex that is subjectively and objectively offensive and that is pervasive, persistent, or severe. The College considers a variety of factors related to the severity, persistence, or pervasiveness of the sex-based harassment, including: (1) the type, frequency, and duration of the conduct; (2) the identity and relationships of persons involved; (3) the number of individuals involved; (4) the location of the conduct and the context in which it occurred; and, (5) the degree to which the conduct affected one's employment or educational opportunities. The more severe the sex-based harassment, the less need there is to show a repetitive series of incidents to find a hostile environment. A single instance of sexual assault may be sufficient to create a hostile environment. Likewise, a series of incidents may be sufficient even if the sex-based harassment is not particularly severe.

Forms of Sexual Harassment: In some cases, sexual harassment is obvious and may involve an overt action, threat, or reprisal. In other instances, sexual harassment is subtle and indirect, with a coercive aspect that is unstated. Some examples include the following:

- Sexual harassment can occur between persons of equal power status (e.g., student to student, staff to staff) or between persons of unequal power status (e.g., faculty member to student, coach to student-athlete). Although sexual harassment often occurs in the context of the misuse of power by the individual with the greater power, a person who appears to have less or equal power in a relationship can also commit sexual harassment.
- Sexual harassment can be committed by (or against) an individual or by (or against) an organization or group.
- Sexual harassment can be committed by an acquaintance, a stranger, or people who shared a personal, intimate, or sexual relationship.
- Sexual harassment can occur by or against an individual of any sex, gender identity, gender expression, or sexual orientation.

Examples of behavior that might be considered sexual harassment include, but are not limited to:

- Unwanted sexual innuendo, propositions, sexual attention, or suggestive comments and gestures; inappropriate humor about sex or gender-specific traits; sexual slurs or derogatory language directed at another person's sexuality, gender, gender identity, sexual orientation, or gender expression; insults and threats based on sex, gender, gender identity, sexual orientation, or gender expression; and other oral, written, or electronic communications of a sexual nature that an individual communicates is unwanted and unwelcome.

- Written graffiti or the display or distribution of sexually explicit drawings, pictures, or written materials; sexually charged name-calling; or the circulation, display, or creation of emails, text messages, or websites of a sexual nature.
- Display or circulation of written materials or pictures degrading to an individual or gender group where such display is not directly related to academic freedom or to an educational/pedagogical, artistic, or work purpose.
- Unwelcome physical contact or suggestive body language, such as touching, patting, pinching, hugging, kissing, or brushing against an individual's body.
- Physical coercion or pressure of an individual to engage in sexual activity or punishment for a refusal to respond or comply with sexual advances.
- Use of a position of power or authority to: (1) threaten or punish, either directly or by implication, for refusing to tolerate harassment, for refusing to submit to sexual activity, or for reporting harassment; or (2) promise rewards in return for sexual favors.
- Acts of verbal, nonverbal, or physical aggression, intimidation, or hostility based on sex or sex-stereotyping.

### **Sexual Assault**

Sexual assault is any intentional sexual contact without consent, whether such contact directly touches skin or is through clothing. It includes any intentional sexual contact with the breasts, buttocks, groin, genitals, mouth, or other bodily orifice of another; or touching another with any of these body parts; or making another touch you or himself or herself with or on any of these body parts; or any intentional bodily contact of a sexual nature, whether or not it involves the previously mentioned body parts; or disrobing or exposure of another without that person's consent. Sexual assault also includes attempted nonconsensual sexual intercourse.

### **Rape**

Rape is a form of sexual assault involving sexual penetration without consent. Rape is defined as: (a) any sexual penetration of the vagina or anus, however slight, with any object or body part without consent; or (b) any penetration of the mouth, however slight, by any sex organ or any object used in a sexual manner without consent.

### **Inducing Incapacitation**

Inducing incapacitation includes the provision of alcohol or drugs to an individual, with or without that individual's knowledge, for the purpose of causing harm, impairment or intoxication or taking advantage of that individual's impairment or intoxication.

### **Coercion**

Coercion is defined for purposes of this section as the application of unreasonable pressure to take part in sexual activity or in any of the prohibited conduct listed in this document. Unreasonable pressure can be exerted through physical or emotional force, intimidation, misuse of authority, or outright threats. When someone makes it clear that he or she does not want to engage in sexual activity or does not want to go beyond a certain point of sexual interaction, continued pressure beyond that point may be considered coercive. Ignoring or dismissing the objections of another person may also be a form of coercion.

### **Sexual Exploitation**

Sexual exploitation occurs when a person takes sexual advantage of another person for the benefit of anyone other than that person without that person's consent. Examples of behavior that could rise to the level of sexual exploitation include:

- Prostituting another person;
- Recording images (e.g., video, photograph), audio, or otherwise of another person's sexual activity, intimate body parts, or the person in a state of undress;
- Distributing images (e.g., video, photograph), or audio of another person's sexual activity, intimate body parts, or the person in a state of undress; and

- Viewing another person’s sexual activity, intimate body parts, or the person in a state of undress in a place where that person would have a reasonable expectation of privacy.

Even if a person consented to sexual activity, consent must also be given to any photographing or recording of sexual activity. In addition, even if a person consented to photographing or recording of sexual activity, consent must also be given for any distribution of that material.

**Domestic Violence**

Domestic violence is abusive behavior in any relationship that is used by one person to gain or maintain power and control over another person. It includes asserted violent misdemeanor and felony offenses committed by the victim’s current or former spouse, current or former cohabitant (e.g., roommate), or person similarly situated under domestic or family violence law. Domestic violence can be physical, sexual, emotional, economic, or psychological actions or threats of actions that influence another person.

**Dating Violence**

Dating violence is violence committed by a person who is or has been in a social relationship of a romantic or intimate nature with the victim. Whether there was such a relationship will be determined by the length, type, and frequency of the interaction.

**Intimate Partner Violence**

Intimate partner violence means any physical or sexual harm against an individual by a current or former spouse of, or person in a dating relationship with, such individual that results from any action by such spouse or such person that may be classified as a sexual assault, stalking, or family violence.

**Stalking**

Stalking involves a course of conduct directed at a specific person that would cause a reasonable person to suffer substantial emotional distress or to fear for that person’s own safety or that of another. This includes cyberstalking, a particular form of stalking in which electronic media such as the Internet, social networks, blogs, texts, or other similar forms of contact are used to pursue, harass, or make unwelcome contact with another person. Stalking and cyberstalking may involve individuals who are known to one another or have an intimate or sexual relationship or may involve individuals not known to one another. For the purposes of this definition:

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

“Reasonable person” means a prudent person who normally exercises due care under similar circumstances.

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

**Improper Romantic Relationships**

All relationships that occur in a hierarchical relationship present an imbalance of power. By virtue of his or her position of authority, a supervisor or faculty member is able to influence the terms and conditions of a subordinate’s employment or a student’s academic standing. Therefore, Trinity College forbids romantic relationships between an employee (faculty or staff) and any student (including undergraduate, graduate, and IDP) for which that employee (faculty or staff) has responsibility by virtue of any professional supervisory obligations, including teaching, advising, departmental, committee, and coaching.

Additionally, the College expects all supervisory staff (whether faculty or staff) and all faculty (whether supervisory or not) to avoid engaging in romantic relationships with individuals (whether students or employees) over whom they exercise or have the potential to exercise power. If an employee feels that such a relationship cannot be avoided, counsel should be sought from an Appropriate College Official, as defined below, to ensure that necessary steps are taken to avoid potential conflict.

### **Retaliation**

Consistent with state and federal laws, this policy prohibits retaliation against a person for: reporting discrimination and harassment; filing a complaint of discrimination or harassment; or participating in the investigation or adjudication of such a complaint. Retaliation is also prohibited against persons who assist others in bringing a complaint of discrimination or harassment by offering advice and moral support or by giving testimony or documentary evidence in response to a complaint.

Retaliation is defined as conduct that may reasonably be perceived to:

- adversely affect a person's educational, living, or work environment because of his or her good-faith participation in the reporting, investigation, and/or resolution of a report of a violation of this policy; or
- discourage a reasonable person from making a report or participating in an investigation under this policy, any other College policy, or any other local, state, or federal complaint process, e.g., filing a complaint with an entity such as the U.S. Department of Education.

Retaliation includes, but is not limited to, acts or words that constitute intimidation, threats, or coercion intended to pressure any individual to participate, not participate, or provide false or misleading information during any proceeding under this policy. Retaliation may include abuse or violence, other forms of harassment, and/or making false statements about another person in print or verbally with intent to harm their reputation.

Retaliation can be committed by any individual or group of individuals, not just a Responding Party or a Complaining Party. Retaliation constitutes a violation of this policy even when the underlying allegations did not result in a finding of responsibility.

Any person who retaliates against an individual reporting, filing, or participating in the investigation or adjudication of a complaint of discrimination or sexual misconduct as defined in this policy is subject to disciplinary action up to and including expulsion or termination. Retaliation is prohibited even if the underlying complaint is eventually dismissed or is deemed to lack merit.

### **False Accusations**

Intentionally false accusations will not be tolerated. Any person who brings an intentionally false claim of discrimination or harassment is subject to disciplinary action up to and including expulsion or termination. A claim will not be deemed intentionally false merely because there is insufficient evidence to prove a violation of this policy or because it is deemed to be without merit. An intentionally false claim is one made with knowledge beforehand that it is false and with malicious intent toward another person.

*The prohibited conduct listed above is not exhaustive. The College may consider any other conduct that has a sexual or gender-based connotation under this policy.*

### **Other Definitions**

#### **Affirmative Consent**



Affirmative consent means an active, clear and voluntary agreement by a person to engage in sexual activity with another person. Affirmative consent is informed, freely and actively given, and communicated through mutually understandable words or actions that indicate a willingness to participate in mutually agreed upon sexual activity. It is the responsibility of each person to ensure that he or she has the affirmative consent of all persons engaged in the sexual activity and that such consent is sustained throughout the sexual activity. Consent may never be given by minors, mentally disabled persons, those who are incapacitated, and those who are by law unable to give consent. If a person is mentally or physically incapacitated or impaired so that such person cannot understand the fact, nature, or extent of the sexual situation, there is no consent; this includes impairment or incapacitation due to alcohol or drug consumption that meets this standard or being asleep or unconscious.

Consent obtained by fraud or force (actual or implied) is not consent, whether that force is physical force, threats, intimidation, or verbal coercion. A lack of verbal or physical resistance alone does not meet the affirmative-consent standard and does not of itself indicate consent. Past consent on its own cannot be construed as current/future consent. Moreover, consent may be withdrawn at any time. Consent to engage in sexual activity with one person does not imply consent to engage in sexual activity with another person. Consent to engage in one form of sexual activity does not imply consent to engage in other forms.

References to “consent” in this policy should be construed as meaning “affirmative consent.”

#### **Appropriate College Official**

For purposes of this policy, the term Appropriate College Official refers to the Title IX Coordinator or a Deputy Title IX Coordinator; an Associate Dean of Students, the Dean of Students, or the Dean of Campus Life and Vice President for Student Affairs; a Dean of Academic Affairs or the Vice President for Academic Affairs; an Associate Director, or the Director of Human Resources.

#### **Reporter**

For the purposes of this policy, the term Reporter refers to anyone who reports an allegation of sexual misconduct to the College. A Reporter can be the victim of alleged sexual misconduct, a bystander, or any other person with reliable information about alleged sexual misconduct. A Reporter need not be a Complainant, as defined below.

#### **Complainant**

A Complainant is one who initiates the College’s Sexual Misconduct adjudication process by bringing a complaint of sexual misconduct against a Trinity College student, employee (including staff and faculty), or contractor. A Complainant need not be a member of the College community so long as the College has jurisdiction over the person accused of sexual misconduct. In cases where the circumstances of an alleged sexual misconduct suggest that the safety of the College community is at risk, the College may choose to act as a Complainant, even in the absence of a complaint by the victim of the alleged sexual misconduct.

#### **Respondent**

A Respondent is an individual accused of sexual misconduct in a complaint filed with the College.

#### **Party or Parties**

When the Complainant and the Respondent are discussed collectively, they will be referred to as the Parties and may be referred to individually as a Party.

#### **Available Assistance**

### **Accommodations and Interim Measures**

Trinity College will identify appropriate options to determine whether accommodations or interim measures, when requested, are reasonably available in a particular case. It is not necessary for someone affected by sexual misconduct to file a complaint, participate in an adjudication process, or file a criminal complaint in order to request accommodations or interim measures from the College. The College will maintain the confidentiality of any accommodations or interim measures provided, to the extent that maintaining such confidentiality would not impair the ability of the College to provide the accommodations or interim measures. All accommodations and interim measures will be conveyed to and/or coordinated with the Title IX Coordinator.

Accommodations and/or interim measures may include, but are not limited to, the following:

- No-contact orders issued by the College are measures that restrict encounters and communications between the parties.
- Academic accommodations are measures that include deadline extensions, incompletes, course changes or late drops, or other arrangements as appropriate.
- Residential accommodations are measures that include arranging for new housing or providing temporary housing options, as appropriate.
- Transportation or working arrangements may be changed or other employment accommodations made, as appropriate.
- Access to support services will be provided with assistance by the College, including advocacy, academic support, counseling, disability, health or mental health services, visa and immigration assistance, student financial aid services, and legal assistance both on and off campus, as applicable.
- Assistance with reporting a crime to local law enforcement may be requested at any time by an individual involved in an alleged incident of sexual misconduct. Such individuals may request orders of protection, restraining orders, or relief from abuse orders from courts of appropriate jurisdiction. The College will provide reasonable assistance upon request. The College will also work to respect and implement the requirements of such orders on premises that it owns or controls, as necessary and appropriate.

For a list of available resources and services, including information about medical care and evidence preservation, see “Appendix A.”

### **Reporting Protocols and Confidentiality**

Trinity College strongly encourages individuals to report incidents of sexual misconduct so that any victim of alleged sexual misconduct may gain access to available support and to allow the College to respond appropriately. The College will accept a report of sexual misconduct at any time but strongly encourages prompt reporting, as resolution options narrow over time, especially if the College no longer has disciplinary jurisdiction over the person accused.

This section describes the various reporting and disclosure options available and the associated confidentiality implications. Because of their role at Trinity College, some employees are able to maintain a higher degree of confidentiality, but most employees are required to report all relevant details of an alleged incident to other College officials who may be responsible for initiating, investigating, and adjudicating a complaint. The distinctions between these groups are explained below so that individuals can make informed choices about how and where they seek help and guidance.

In all cases, the College will handle information related to these cases with sensitivity and discretion, and victims can request confidentiality as detailed below. The College will not disclose the identity of the victim or the person accused of sexual misconduct, except as

necessary to carry out the investigation and adjudication process or as permitted under state or federal law.

### **“Confidential” Reports Made to a College Employee**

In most cases, a Complainant or a Reporter may seek assistance, support, and advice from certain designated employees without initiating a College investigation that could reveal the identity of a victim of alleged sexual misconduct or the fact that the Reporter or the victim of alleged sexual misconduct has disclosed the incident. There are two groups of employees to whom a report of sexual misconduct can be made without fear that the identity of the Reporter or the victim of alleged sexual assault will be disclosed to others on campus. The members of these two groups are listed, along with their contact information, in “Appendix A.” The distinctions between the two groups are outlined below.

1. **Professional and Designated Chaplains: Privileged Communications**  
Members of the Counseling Center with professional licenses, or who are supervised by such a person in a clinical capacity, and designated College chaplains are subject to recognized privileges that ethically prohibit them from disclosing information provided to them in their professional capacities. As such, clinical counselors may not disclose privileged information told to them, in confidence, to anyone unless there is an imminent threat to life or safety. In cases of sexual misconduct involving adults, designated chaplains may not disclose information shared with them in confidence. These employees are identified in “Appendix A” by the initials **PE**.
2. **Non-licensed Counselors and Advocates: Confidential Communications**  
The nonstudent employees of the Women & Gender Resource Action Center (WGRAC) and the Health Center are confidential employees. They are not required to report information that identifies a victim of alleged sexual misconduct but are required to report general, non-personally identifying information about an alleged incident to the Title IX Coordinator. **This means that these employees will provide to the College general details, such as the nature, date, time, and general location of the alleged incident, but they will not disclose the names of those involved or other details that may reveal the identity of such individuals.** Before reporting any information to the Title IX Coordinator, these employees will first consult with the Reporter to ensure that the general report does not contain any personally identifying details. These employees are identified in “Appendix A” by the initials **CE**.

**Note: When required by law or by court order, or when required to avert a serious threat of danger to a person or property, any of the above employees (whether designated as privileged or confidential) may reveal otherwise confidential information, including the identities of Reporters and victims of alleged sexual misconduct.** An individual who speaks to any of the employees described above must understand that if a Reporter or a victim of alleged sexual misconduct wants to maintain confidentiality, the College may be unable to conduct an investigation into the particular incident or pursue disciplinary action against the person accused of sexual misconduct. However, privileged and confidential employees can provide information about and assist individuals in requesting other support and services, such as victim advocacy, academic support or accommodations, disability, health or mental health services, and changes to living, working, or transportation arrangements. A victim of alleged sexual misconduct who at first requests confidentiality may later decide to file a complaint with College officials and/or with law enforcement and will be assisted by privileged and confidential employees in doing so.

Connecticut state law specifically requires individuals to report incidents to law enforcement or to the appropriate state officials when the victim of alleged sexual misconduct is under the age of 18 or has an intellectual disability. The College should also be notified of any such

report. If a report of sexual misconduct indicates a serious or ongoing threat to the College community, the College may be required to issue a timely warning to the community. The warning would not include any information that identifies the Reporter or a victim of alleged sexual misconduct.

### **Responsible Employees – Non-Confidential Communications**

Other than those few employees who are subject to a recognized privilege or expressly designated as confidential employees, as described above, all College employees, including faculty, staff, and Resident Assistants (RAs) are Responsible Employees who are required to report incidents of sexual misconduct to the Title IX Coordinator or Deputy Coordinator. Responsible Employees are identified in “Appendix A” by the initials **RE**.

A disclosure to a Responsible Employee constitutes a report to the College and obligates the College to take immediate and appropriate steps to investigate the report, resolve the matter promptly and equitably, and remedy the effects of the reported sexual misconduct. As such, Responsible Employees are required to report to the Title IX Coordinator all relevant details about the incident, such as the name(s) of the victim(s) of the alleged sexual misconduct and person(s) accused of sexual misconduct, any witnesses, and the date, time, and specific location of the alleged incident. To the extent possible, this information will be shared only with people responsible for handling the College’s response and in accordance with state and federal law. Examples include College employees or agents who are responsible for processing, investigating, adjudicating, and responding to sexual misconduct reports, deans, program directors, supervisors, human resources staff, and Department of Campus Safety or other campus security personnel who are responsible for reporting campus crime statistics and issuing timely warnings under the Clery Act.

Absent a court order, a Responsible Employee should not share information with law enforcement without the consent of the victim of alleged sexual misconduct or unless that person has also reported the incident to law enforcement. Before a Reporter discloses any information to a Responsible Employee, the employee should explain the reporting obligations and direct the Reporter to privileged or confidential resources should that person wish to maintain confidentiality. A Reporter can still request confidentiality when discussing an incident with a Responsible Employee, but the employee and the College may not be able to honor that request, described below.

### **Requests to a Responsible Employee for Confidentiality**

When a Complainant and/or a Reporter discloses an incident of sexual misconduct to a Responsible Employee, the Complainant and/or Reporter may request that the information be kept confidential or request that the College not take action on the report. The Responsible Employee is still required to report the same information to the Title IX Coordinator but will also include the Complainant and/or Reporter’s request to maintain confidentiality. In such a case, the Title IX Coordinator will weigh the request for confidentiality against the College’s obligation to provide a safe, nondiscriminatory environment for all College community members, including any victim of alleged sexual misconduct. In evaluating the request for confidentiality, the Title IX Coordinator may consult with other College officials or law enforcement agencies, as appropriate, and may consider a range of factors, such as:

- whether it is likely that the person accused of sexual misconduct will commit additional acts of sexual or other misconduct, which will be informed by additional factors, such as:
  - whether there have been other sexual misconduct complaints about the same person;
  - whether the person accused of sexual misconduct has a history of arrests or records indicating a history of violence;

- whether the person accused of sexual misconduct threatened further sexual misconduct or other violence against the victim of the alleged sexual misconduct or others;
- whether the alleged sexual misconduct was committed by multiple perpetrators;
- whether the alleged sexual misconduct involved use of a weapon;
- whether the victim of alleged sexual misconduct is a minor;
- whether the College possesses other means to obtain relevant evidence of the alleged sexual misconduct (e.g., security cameras, information known to College personnel, or physical evidence);
- whether the report of sexual misconduct reveals a pattern of perpetration (e.g., via illicit use of drugs or alcohol) at a given location or by a particular group.

The presence of one or more of these factors could lead the College to investigate and, if appropriate, pursue disciplinary action, even in the absence of a complaint by a victim of the alleged sexual misconduct. If none of these factors is present, the College may respect a request for confidentiality; however, because it may limit the College's ability to commence disciplinary proceedings, the College will weigh this question carefully.

Regardless of whether the College can honor the request for confidentiality, the College will take action as necessary to assist and support any victim of alleged sexual misconduct to the extent possible, including the measures listed in "Available Assistance," when such measures are requested and reasonably available.

If the College determines that it cannot honor a request for confidentiality, the College will inform a victim of alleged sexual misconduct prior to starting an investigation and will, to the extent possible, only share information with College officials with a need to know. The College will not compel a victim of alleged sexual misconduct to participate in a sexual misconduct investigation or disciplinary proceeding. In a case where the victim of alleged sexual misconduct does not wish to file a complaint and the College has sufficient information to indicate a potential threat to the safety of the community, the College will initiate the investigation and adjudication process as the Complainant in the case.

Because the College is under a continuing obligation to address sexual misconduct campus wide, reports of sexual misconduct (including anonymous and third-party reports in which names are not mentioned) will also prompt the College to consider broader remedial action — such as increased monitoring, supervision, or security at locations where the reported sexual misconduct occurred; increasing education and prevention efforts, including to targeted population groups; conducting climate assessments/victimization surveys; and/or revisiting its policies and practices.

### **Anonymous Reporting**

Although the College encourages victims of alleged sexual misconduct or persons with information regarding sexual misconduct to talk to someone, the College provides an online form, accessible from the Campus Safety and SART websites (<http://www.trincoll.edu/cs> and click on "Anonymous Reporting"), for anonymous reporting to the Title IX Coordinator and Campus Safety officials. If the report includes personally identifying information, it may serve as notice to the College for the purpose of initiating an investigation and/or timely warning notice to the College community in order to alert the community to a perceived serious or ongoing threat to public safety.

### **Exception for Disclosures During Certain Public Awareness Events**

Public awareness events, such as "Take Back the Night," vigils, protests, or other forums in which disclosures of incidents of sexual misconduct occur, are not considered notice to the College of sexual misconduct for purposes of its obligation to investigate any particular incident(s). Such events may, however, inform the need for campus wide education and

prevention efforts, and the College will provide information about Title IX resources at these events.

## **Complaint Investigation and Adjudication Process**

### **Overview**

The information in the sections below, except as noted, applies to Trinity College employees and students, as well as third parties who wish to file a complaint of sexual misconduct involving a Trinity employee (staff or faculty) or student through the College's processes.

All Trinity students, faculty members, staff members, and covered third parties have the right to pursue complaints of sexual misconduct outside of Trinity College's disciplinary processes and are encouraged to consult local, state, or federal law enforcement agencies, including the local police or the Department of Education's Office for Civil Rights, regardless of whether they file a complaint with the College. See "Appendix A" for information on how to file an external complaint.

Trinity will not wait for the conclusion of a criminal investigation or proceeding to begin its own investigation and resolve complaints under this policy. The College will, however, comply with valid requests by law enforcement for cooperation in a criminal investigation. As such, the College may need to delay temporarily an investigation under this policy while law enforcement investigates. Once law enforcement has completed gathering evidence, the College will promptly resume and complete its investigation. The College may also take interim measures to promote the safety and well-being of the victim of alleged sexual misconduct and the school community while law enforcement is gathering evidence.

The College's procedures for handling complaints of sexual misconduct will be prompt, fair, and impartial from the initial investigation to the final result in that they will be:

- Completed within reasonably prompt time frames as designated in this policy, which time frames may be extended for good cause and/or due to extenuating circumstances, with written notice to the Complainant and the Respondent of the delay and the reason for the delay;
- Conducted in a manner that is consistent with the College's policies and transparent to the Complainant and the Respondent, including timely notice of meetings at which the Complainant or Respondent may be present, and providing the Complainant, the Respondent, and Appropriate College Officials with any information that will be used during the process; and
- Conducted by officials who are trained annually in issues relating to sexual misconduct and related retaliation and who do not have a conflict of interest or bias for or against the Complainant or the Respondent.

### **Filing a Complaint**

A report of Prohibited Conduct may be made verbally or in writing but will ultimately need to be recorded in written form to initiate the complaint process. A complaint may be filed by contacting any Appropriate College Official. See "Appendix A" for contact information. When an Appropriate College Official receives actual notice, i.e., a written complaint of alleged misconduct that may constitute a violation of this policy, Trinity will initiate the following process:

1. The Appropriate College Official will promptly notify the Title IX Coordinator, who will determine the appropriate course of action.
2. Prior to an investigation or adjudication, the Title IX Coordinator or a Deputy Title IX Coordinator will consider the Complainant's request for confidentiality, if any, in accordance with the "Reporting Protocols and Confidentiality" section of this policy.

3. Upon receiving the complaint, and at any point during the investigation and adjudication process, the Title IX Coordinator or a Deputy Title IX Coordinator may determine that a complaint of sexual misconduct or related retaliation also contains allegations that, if proven, could constitute other forms of harassment or discrimination as defined by the College's policy on discrimination and harassment. If so, the Title IX Coordinator or Deputy Title IX Coordinator will consult with an Appropriate College Official to determine whether and how the other allegations of harassment or discrimination may be investigated and adjudicated. In all cases, the parties will receive written notification of any additional allegations of harassment or discrimination that will be investigated and adjudicated.
4. In cases where the Title IX Coordinator or a Deputy Title IX Coordinator believes that the allegations, if proven, would not constitute a violation of this policy, the Complainant will be advised of other judicial and support options as appropriate, and no further investigation will be pursued under this policy. If new information is subsequently provided to the Title IX Coordinator or a Deputy Title IX Coordinator, a decision not to investigate further may be reevaluated.

### **Investigation and Adjudication Process**

The College recognizes the interests of both parties to have the investigation and adjudication process completed in the most expeditious manner possible; however, the College expressly states that it must balance this with the need to ensure that a thorough investigation, full participation, and adequate response time is afforded all parties.

1. The Title IX Coordinator or a Deputy Title IX Coordinator will provide a copy of this policy to the Complainant and Respondent and will inform both parties in writing that the College is investigating an allegation that the Respondent engaged in sexual misconduct and/or related retaliation. This will include notification of any additional possible policy violations being investigated in relation to the incident.
2. In the event a Respondent who has been notified of an investigation/adjudication fails to cooperate with the investigator, the investigation may proceed, a finding reached, and a sanction imposed based solely on the other information available. Furthermore, the Respondent may be subject to disciplinary action for failing to cooperate.
3. Although the College does not condone any other violations of College policy, a report of sexual misconduct and related retaliation is taken very seriously. Accordingly, where appropriate, the College will offer leniency with respect to other policy violations (e.g., minor drug or alcohol violations) that may be revealed as a result of a report of sexual misconduct. The nature and scope of the leniency will depend on the particular circumstances involved. The Appropriate College Official and/or other supervisory authority, as appropriate, will have sole discretion in determining the appropriate course of action.
4. The investigation will not include any inquiry into the Complainant's sexual history other than with the Respondent and as relevant to the allegations at hand.
5. The Complainant and Respondent will be afforded the same rights and opportunities throughout the investigation and adjudication process, including the opportunity to present evidence and witnesses on their behalf.
6. Duties of Participants:
  - i. Duty of Honesty – All Parties and witnesses are obligated to be completely honest during the course of the entire process set forth in this policy. Any person who knowingly makes a false statement — either explicitly or by omission — in connection with any part of the process may be subject to separate College disciplinary action.
  - ii. Duty of Cooperation – All Parties and witnesses are obligated to cooperate with the Title IX Coordinator and any persons charged with implementing

this policy. Any person who knowingly interferes with the actions taken to implement the reporting, investigation, or resolution of matters under this policy may be subject to separate College disciplinary action.

- iii. Duty of Confidentiality – All Parties and witnesses are obligated to maintain the confidentiality of all information and materials they become aware of or possess as a result of their participation in the investigation or adjudication procedures set forth in this policy. Parties may share confidential information only with their identified adviser of choice. The Duty of Confidentiality continues beyond the conclusion of the case.
7. Complainants and Respondents are entitled to the same opportunities to have an adviser or support person of their choice (who may be an attorney or someone with legal training) present at any meetings or proceedings related to the investigation and adjudication process under this policy, provided the adviser's involvement does not result in the undue disruption, postponement, or delay of such meetings or proceedings. Advisers may provide guidance, support, or advice to the Complainant or Respondent privately but may not act as speaking advocates at a meeting or proceeding. An investigator or other College representative may bar an adviser from further participation if the adviser becomes disruptive or does not comply with these requirements and may thereafter proceed to complete an investigation or adjudication without the adviser. Please note, the College does not cover costs associated with a party's choice of adviser.
8. If a Complainant or Respondent is concerned that any College official involved in the investigation or adjudication may be biased or have a conflict of interest, including the assigned investigator, the concerned party should inform the Title IX Coordinator, a Deputy Title IX Coordinator, or an Appropriate College Official immediately. If this concern involves the Appropriate College Official, the Title IX Coordinator, or a Deputy Title IX Coordinator, the Complainant or Respondent may report the conflict to any one of these individuals who is not implicated in the conflict. The Appropriate College Official or Title IX Coordinator, as applicable, will consider the reported conflict and inform the parties of whether and how the conflict may be resolved.

Conflict of Interest: As soon as possible, but no later than three (3) calendar days after receiving notice of the identity of the investigator(s) and/or adjudicator(s), the Parties should inform the Title IX Coordinator (in writing) of any conflicts or potential conflicts of interest with regard to the selected investigator(s) and/or adjudicator(s). The Title IX Coordinator will consider the nature of the conflict and determine if different individuals should be assigned as investigator(s) and/or adjudicator(s). The Title IX Coordinator's decision regarding any conflicts is final.

9. Students will play no role as investigators or panelists in the investigation and adjudication process.

### **Special Situations in the Investigation Process**

The College retains the right to determine, in its sole discretion, if it will address a report of conduct that falls under this policy administratively and outside of the process described herein when the safety of the College community is at risk, if the material facts are undisputed, if there are extenuating circumstances involving either of the Parties, or if the Title IX Coordinator, in consultation with appropriate administrators, determines it is in the best interest of the College and/or the community to do so.

Regardless of whether a complaint is made, the College may investigate health, safety, or welfare concerns involving Trinity College students, employees, programs or activities, including concerns about sexual violence or harassment. The scope of such investigations will be determined on a case-by-case basis by the College's administration in consultation with



legal counsel and may include outside investigators or consultants. Depending on the purpose of the investigation, disclosure of the results may be limited. Faculty, staff, and students are expected to cooperate fully with any investigation authorized by the College.

### **Investigation**

1. If it is determined that an investigation and adjudication should proceed under this policy, the Title IX Coordinator or a Deputy Title IX Coordinator will assign one or more investigators to the case.
2. At the discretion of the Title IX Coordinator or Deputy Title IX Coordinator, the assigned investigator may be an employee of Trinity College and/or may be an external investigator hired by the College. The investigator also may be an attorney or someone with legal training. This decision will be informed by the complexity of the case, the availability of internal resources at the time of the investigation, and other reasonable considerations. In either case, the investigator will have appropriate training in investigating cases of alleged sexual misconduct, consistent with federal and state regulation.
3. Trinity's investigation and adjudication process does not require or permit the Complainant and Respondent to interact or communicate directly or indirectly with each other at any time during the investigation and/or disciplinary proceedings.
4. The investigator is authorized to contact any and all individuals with potentially relevant information and may interview such individuals on more than one occasion if necessary. The nature and scope of the investigation is within the discretion of the Title IX Coordinator or Deputy Title IX Coordinator.
5. The Title IX Coordinator or designee may also at any time take appropriate steps, including by way of example only, issuance of no-contact orders and/or no-trespass notices, temporary changes in assignment of duties or housing, changes in class schedules or class requirements, transportation accommodations, or other accommodations, if requested and reasonably available, to protect reporting or complaining parties on an interim basis. These measures can be taken, regardless of whether a victim of alleged sexual misconduct pursues a complaint under this policy.
6. The Complainant and Respondent will be asked to identify all relevant evidence they would like the investigator to review, as well as witnesses they would like the investigator to interview. Both parties may provide, if they wish, a list of questions they would like the investigator to ask of particular witnesses or of each other. The investigator will exercise reasonable discretion in deciding which questions should be excluded.
7. All participants in the investigation are expected to cooperate fully by providing complete, accurate, and truthful information. They may also be expected to sign statements or other documents memorializing the information they provided and will be asked to keep the substance of the interview confidential. Failure to cooperate fully with the investigator may subject the individual to the full range of disciplinary actions, or dismissal of a complaint, as applicable.
8. Formal rules of evidence do not apply in the process described herein. In cases where an evidentiary or procedural question arises in connection with the investigation or adjudication process, the Title IX Coordinator or designated Deputy Title IX Coordinator will decide the question.
9. The investigator will compile the results of the fact-finding process into a preliminary report and provide this report to the Title IX Coordinator or a designated Deputy Title IX Coordinator, who will assess the adequacy and thoroughness of the preliminary report and request further investigation, if warranted. The preliminary report will not include the investigator's conclusions regarding whether the allegations are substantiated.

10. Once complete, the Title IX Coordinator or Deputy Title IX Coordinator will provide the preliminary report, including all relevant documentation, in writing, to the Complainant and Respondent simultaneously, in separate communications.
11. The Complainant and Respondent are encouraged to carefully and thoroughly review the preliminary report. Both parties may submit a written response to the preliminary report to the Title IX Coordinator or Deputy Title IX Coordinator within five (5) business days of receiving the investigator's preliminary report. The Title IX Coordinator or Deputy Title IX Coordinator may extend this deadline based on extenuating circumstances; however, both Complainant and Respondent will be provided the same duration of time in which to submit a written response.
12. The Complainant and Respondent will be provided the other party's written response and will have five (5) business days thereafter to provide a follow-up response, in writing, to the Title IX Coordinator or Deputy Title IX Coordinator.
13. The investigator and/or Title IX Coordinator or Deputy Title IX Coordinator may, based on the parties' written responses or other relevant information, determine that further investigation is required. In such cases, a secondary report will be provided in writing to the Complainant and Respondent simultaneously, and both will have the opportunity to provide written responses, as stated in subsections 11 and 12 above. This opportunity is limited to one secondary report. The investigator will create and submit to the Title IX Coordinator or Deputy Title IX Coordinator a final report based on the preliminary or secondary report. The final report will include all investigation materials deemed permissible, the Complainant's and Respondent's written responses and replies, the investigator's finding of whether the allegations of the Complainant are substantiated, and the investigator's rationale including relevant credibility assessments of all witnesses. This recommendation will be determined by a "preponderance of the evidence" standard, i.e., whether it is more likely than not that the allegations of the complaint are proven.
14. The Title IX Coordinator or Deputy Title IX Coordinator will provide the final report simultaneously in writing to both parties. Each party will then be provided five (5) business days to submit their final statement on the report. Such final statements will be provided to the other party, who will in turn be provided five (5) business days to respond to/rebut the other party's statement one final time. All time periods in this section run concurrently.
15. If at any point a Respondent chooses not to contest the complaint, the Title IX Coordinator or a Deputy Title IX Coordinator will convene an Administrative Panel as described below.

### **Determination and Sanction**

1. If the investigator finds that the allegations are substantiated, the Title IX Coordinator or Deputy Title IX Coordinator will convene and charge an Administrative Panel of three College employees, in a closed session, to determine whether the findings, as presented in the investigative report, violate College policy. This panel will also apply the "preponderance of the evidence" standard described above. The panel will forward its decision to the Title IX Coordinator or Deputy Title IX Coordinator.
2. The Title IX Coordinator or Deputy Title IX Coordinator may terminate the adjudication if the investigator finds that the facts alleged, by a preponderance of the evidence, are not substantiated by the evidence, information, and findings.
3. The Administrative Panel will be drawn from a pool of College employees trained to adjudicate matters under this policy. The pool will not include the Vice President for Academic Affairs, the Vice President of Finance, nor the Dean of Campus Life and Vice President for Student Affairs, who must remain available for appeals.
4. The Title IX Coordinator or Deputy Title IX Coordinator will inform the Complainant and the Respondent simultaneously of the Administrative Panel's decision, in writing, no later than one (1) business day following the decision. If the

Administrative Panel finds that College policy has been violated, both parties may submit Impact Statements to the Title IX Coordinator or Deputy Title IX Coordinator within five (5) business days. Impact Statements will present the parties with the opportunity to share any information they would like the Administrative Panel to consider when assigning a sanction.

5. The Title IX Coordinator or Deputy Title IX Coordinator will reconvene the Administrative Panel and provide it with the Impact Statements and judicial/disciplinary history summary (date, charge, and disciplinary action) of the respondent, if applicable, along with any available precedents, i.e., sanctions imposed in similar cases.
6. The Administrative Panel will consider all of the documents and information provided in determining the appropriate sanction.
7. To the extent permitted by law, the Complainant and Respondent will be informed simultaneously, in writing, no later than one (1) business day following the conclusion of the disciplinary proceeding, of (a) the determination and the outcome of any disciplinary or other action arising out of an allegation of sexual misconduct and/or related retaliation; (b) the rationale for the result and any sanction(s); and (c) Trinity's procedures for appealing the outcome.
8. Sanctions will be imposed by the Appropriate College Official. Sanctions against a faculty member are subject to the procedure outlined in "Appendix B.9" of the *Faculty Manual*. Both parties to the case will be notified in writing of the final decision simultaneously.

### **Appeals**

The Complainant and Respondent may appeal the outcome, subject to the limitations set forth below. The Title IX Coordinator or Deputy Title IX Coordinator will provide written notification to the Complainant and the Respondent of any applicable appeal procedures at the time the Complainant and Respondent receive notice of the outcome decision. The purpose of an appeal is to allow the College to review and correct material errors in the adjudication process.

### **Grounds**

Appeals must satisfy one or more of the following bases for appeal:

1. Discovery of new factual information that was not known or available at the time of the adjudication and the presentation of which would have affected the original outcome. Omission of factual information that was known and available to the appealing party is not a valid ground for an appeal;
2. Material procedural error that rendered the adjudication fundamentally unfair;
3. Abuse of discretion in the issuance of a sanction, meaning that the Administrative Panel imposed a sanction that was significantly disproportionate to the offense; or
4. Evidence of bias in the adjudication.

The right of appeal is only available to a Respondent or Complainant.

### **Procedures**

An appeal must be made in writing. An appeal in which the Respondent is a faculty employee must be directed to the Vice President for Academic Affairs; an appeal in which the Respondent is a student must be directed to the Dean of Campus Life and Vice President for Student Affairs; and an appeal in which the Respondent is a staff employee must be directed to the Vice President of Finance. Any of these individuals may assign the appeal to a designee, so long as that person is appropriately trained and does not have a conflict of interest.

Appeals must be made within five (5) business days of receipt of the determination or within five (5) business days of receipt of the decision regarding sanctions and/or other actions and must include the grounds for appeal and an outline of any supporting evidence. Appeals transmitted via e-mail will be considered to be “in writing” for the purposes of this section.

The appellate official may deny the appeal if it does not satisfy at least one of the four grounds for appeal described above. In cases in which one or more of the appeal grounds have been met, the substance of the appeal will be weighed carefully. If the appellate official determines that there are sufficient grounds to alter the prior decision, it is the responsibility of the appellate official to determine the scope of a new review and to award one of the following two forms of relief:

- Return the case to the Title IX Coordinator or Deputy Title IX Coordinator, with instructions for further investigation, if applicable, and consideration by the same or a different Administrative Panel; the decision about the composition of the panel, which shall be at the sole discretion of the appellate official; or
- Return the case to the Title IX Coordinator or Deputy Title IX Coordinator with instructions to appoint a different Administrative Panel to review the case.

Absent extenuating circumstances, the appellate official will notify the Complainant and Respondent of the appeal decision (i.e., whether the grounds for appeal have been adequately established) simultaneously in writing within fifteen (15) business days of receiving the appeal and will notify the Title IX Coordinator or Deputy Title IX Coordinator in writing of instructions for any further action.

All decisions by the appellate official following a second review of the case are final. Absent extenuating circumstances, both parties will be notified of the final decision concurrently in writing within fifteen (15) business days of the deadline for the Complainant’s or Respondent’s response to the appeal but no later than one (1) business day following the decision, to the extent permitted by law.

## **Sanctions**

### **Students**

Disciplinary action for students may include suspension or expulsion from any or all College program(s) and activities in which the student is enrolled or participating (including club or intercollegiate athletics); residential reassignment; admonition; confiscation of property; censure; educational sanctions; referral for alcohol/drug education, assessment, or counseling; restitution; fines; restriction; prohibition against participation; or any combination of these sanctions or those listed in the *Student Handbook*. It may also include other action as deemed appropriate under the circumstances (e.g., remedies applied to the Respondent to address the needs of the Complainant, including but not limited to room changes, class changes, building restrictions, extracurricular activity restrictions, modification of no-contact orders to favor the Complainant, and other actions to preserve the rights of the Complainant to a safe environment). Although sanctions for violation(s) of this policy can include any form of discipline as stated in this section, students found to have committed sexual assault will most likely receive a sanction of suspension or expulsion.

### **Staff**

Disciplinary action for staff employees is governed by existing policies in the *Employee Handbook* and/or collective bargaining agreements, as applicable, and may include verbal warnings, written warnings, written reprimands, suspension, termination of employment, or other action as deemed appropriate under the circumstances.

## **Faculty**

Disciplinary action for faculty employees include:

1. **Treatment**: Medical or psychological treatment may be indicated. The matter may be considered closed when the faculty member is verified by a competent professional to be able to resume his or her duties, or this action may be coupled with admonition, censure, or suspension.
2. **Admonition**: This sanction is a letter of admonition that will be sent to the Respondent by the Dean. In addition, a copy of the letter of admonition will be placed in the Respondent's official personnel file.
3. **Censure**: This sanction is a letter of admonition that will be sent to the Respondent by the Dean. In addition, the fact of the admonition will be published in the faculty minutes and a copy of the letter of admonition will be placed in the Respondent's personnel file.
4. **Suspension**: This penalty is a temporary separation from the College. The conditions for the return of the faculty member to the College will be stipulated as part of the sanction. Notice of this penalty will be placed in the Respondent's personnel file.
5. **Dismissal**: This sanction is a permanent separation from the College. Notice of this sanction will be placed in the Respondent's personnel file.

## **No Contact Orders**

No Contact Orders are available as an interim measure and may remain effective permanently regardless of the final case outcome. No Contact Orders will be updated as necessary and remain in effect until revoked in writing by the appropriate College official.

## **Prevention and Education**

The College offers prevention and education programs designed reduce and eliminate sexual harassment, including sexual violence, in the campus community. These programs are available to faculty, staff, students, and covered third parties. Education programs include, but are not limited to, bystander intervention, social event management, and programs around consent. More information is available on the College website.

## **Training**

Individuals conducting investigations and adjudications under this policy will receive training annually on the issues related to sexual misconduct, domestic violence, dating violence, stalking, and related retaliation and on how to conduct a prompt, fair, and impartial investigation and/or adjudication process that protects the safety of Complainants and promotes accountability. Further, the Title IX Coordinator, Deputy Title IX Coordinators, and Campus Safety will be educated in awareness and prevention of sexual assault, stalking, and intimate partner violence and in trauma-informed response.

## Appendix A – Contact Information

### Available Assistance for Victims of Alleged Sexual Misconduct

#### Immediate Assistance

An individual who has been subject to an incident of alleged sexual misconduct, has observed an incident, or is otherwise involved should seek immediate assistance as provided below.

- **Hartford Police Department: Emergency, call 911  
Non-emergency, call (860) 757-4000**
- A victim of an alleged incident of sexual misconduct may also access the following off-campus, confidential advocates, support, and resources at any time (24/7):
  - Statewide Sexual Violence Hotline: (888) 999-5545
  - Statewide Sexual Violence Spanish Hotline: (888) 568-8332
  - Statewide Domestic Violence Hotline: (888) 774-2900
  - Statewide Domestic Violence Spanish Hotline: (844) 831-9200
- **Trinity College Campus Safety: (860) 297-2222, 76 Vernon Street. Campus Safety may, in turn contact the Administrator-on-Call (AOC).**
  - The Administrator-on-Call is a College administrator who is available 24 hours per day, every day. Campus Safety personnel and AOCs are considered Responsible Employees as defined in this policy (see the “Reporting Protocols and Confidentiality” section) and are therefore required to report incidents of sexual misconduct to the Title IX Coordinator. The AOC can assist the victim of alleged sexual misconduct with contacting confidential campus resources. The College’s immediate response to an incident of alleged sexual misconduct will include consideration of the victim of alleged sexual misconduct’s request for confidentiality in accordance with this policy and may also include the implementation of safety measures as deemed necessary.
- **Employee Assistance Program, for faculty and staff:** [www.HigherEdEAP.com](http://www.HigherEdEAP.com) or (800) 225-2527.

#### Medical Care and Evidence Preservation

Any individual who may be experiencing or has experienced sexual misconduct, domestic violence, dating violence, stalking, or related retaliation is encouraged to immediately seek any necessary medical care and to seek help from an appropriate College official, law enforcement, and/or medical personnel, even if the individual is uncertain about whether to ultimately pursue a complaint, to file criminal charges, or to seek other legal remedies. *It is important for individuals to preserve all possible evidence in case they decide at some point to engage the legal process or to file a complaint with the College.* Therefore, if at all possible, victims of alleged sexual misconduct should refrain from changing clothes, showering, or otherwise changing their physical state after an incident until after consulting with medical personnel. The individual should also preserve any available physical evidence, documents, or electronic evidence (e.g., text messages, photographs, social media posts, etc.). Such evidence may assist in proving that the alleged criminal offense occurred or may be helpful in obtaining a protective order.

A victim of alleged sexual misconduct may seek medical care, including treatment for injuries, preventive treatment for sexually transmitted diseases, pregnancy tests and contraception, and other health services, plus evidence preservation through a medical exam (i.e., evidence collection kit), at the local facilities listed below. Campus Safety will facilitate transportation as needed and may be reached at (860) 297-2222.

- Hartford Hospital: SANE (Sexual Assault Nurse Examiner) available: 80 Seymour Street, Hartford: (860) 545-5000
- St. Francis Hospital, Hartford: SANE available: 114 Woodland Street: (860) 714-4000

- Hospital of Central Connecticut: SANE available: 100 Grand Street, New Britain: (860) 224-5011

An individual seeking medical attention as described in this policy may be accompanied by an advocate. YWCA Sexual Assault Crisis Services (SACS) offers 24/7 trained volunteer advocates who will accompany a person to the hospital, explain the process, provide advocacy, and stay with the person, if they wish, for the duration of the exam and time at the hospital. An advocate may be reached by calling:

Statewide Sexual Violence 24-Hour Toll-Free Hotline: (888) 999-5545  
 Statewide Sexual Violence 24-Hour Toll-Free Spanish Hotline: (888) 568-8332

Trinity College's Sexual Assault Response Team (SART) members (see below) are available during business hours to accompany a person to the Trinity College Health Center or other facility.

### **Ongoing Assistance**

A victim of alleged sexual misconduct may receive ongoing assistance from on-campus resources as needed. The service locations and contact information for these resources are detailed below.

### **Title IX Coordinator**

Rita Kelley  
 (860) 297-2072  
[titleixcoordinator@trincoll.edu](mailto:titleixcoordinator@trincoll.edu)

Trinity College maintains a Sexual Assault Resource Team (SART). SART members offer support, guidance, referrals, and information. SART members are trained to provide a prompt and thorough response to victims of all forms of alleged sexual misconduct. See below for detailed information on SART members and their individual ability to maintain confidentiality.

[www.trincoll.edu/campus-safety/SART](http://www.trincoll.edu/campus-safety/SART)

### **Members of the Sexual Assault Resource Team (SART) by Confidentiality Level**

#### **Privileged Employees (PE)**

##### **Spiritual and Religious Life:** Chapel

The Rev. Allison Read, College Chaplain: (860) 297-2013

##### **Counseling Center**, 135 Allen Street, (860) 297-2415

Randolph M. Lee, Ph.D., Director

Kristine Kennan, Psy.D., Assistant Director

Katheryne (Kate) Marinchak, Psy. D., Psychologist

(After business hours: An available counselor's phone number may be obtained by calling the office number.)

#### **Confidential Employees (CE)**

##### **The Health Center**, Wheaton Hall, (860) 297-2018

Martha Burke O'Brien, Director

Health Center Staff, with the exception of front desk staff

##### **Women & Gender Resource Action Center (WGRAC)**, Mather Hall, second floor:

Laura Lockwood, Director: (860) 297-2408

Monique Daley, Training and Program Coordinator: (860) 297-4131

##### **Queer Resource Center (QRC)**: (860) 987-6273, 114 Crescent Street

Carrie Robinson, Director of LGBTQ+ Life

**Responsible Employees (RE)**

All employees who are not listed above should be considered Responsible Employees. In particular, the following members of SART are Responsible Employees:

**Campus Safety:** (860) 297-2222

Brian Heavren, Director  
Ramon Rosario, Captain  
Martin Torres, Officer

**Dean of Students Office:** (860) 297-2156

Joe DiChristina, Dean of Campus Life and Vice President for Student Affairs  
Ann Reuman, Senior Associate Dean of Students  
Robert Lukaskiewicz, Associate Dean of Students  
John Selders, Assistant Dean of Students

**Residential Life:** (860) 297-2305, Hamlin/Cook

Joel Copperthite, Meredith Friedman, Daniel Levy, Area Coordinators

**Multicultural Affairs:** (860) 297-2562, Hamlin/Cook

Patti Maisch, Program Coordinator

**Trinity College Hillel:** (860) 297-4195, 74 Vernon Street

Lisa Kassow, Director

**Trinity College Athletics** (860) 297-5279:

Lori Shulman, Coach

**Student Activities, Involvement and Leadership (SAIL):** (860) 297-2049, Mather Hall

Romulus Perez, Assistant Director

**Other Resources**

The U.S. Department of Education's Office for Civil Rights ("OCR") is responsible for enforcing Title IX, as well as other federal civil rights laws that prohibit discrimination in programs or activities that receive federal financial aid. Inquiries and complaints may also be directed to OCR at (800) 421-3481 or ocr@ed.gov.

**Appropriate College Officials**

Rita Kelley, Title IX Coordinator

Kristen Noone, Deputy Title IX Coordinator, Assistant Director, Athletics

Joe DiChristina, Dean of Campus Life and Vice President for Student Affairs

Ann Reuman, Senior Associate Dean of Students

Robert Lukaskiewicz, Associate Dean of Students

Sonia Cardenas, Interim Dean of Faculty and Vice President for Academic Affairs

Dan Hitchell, Vice President of Finance and Chief Financial Officer

Donna Ciarfella, Associate Director of Human Resources



## ***SEX OFFENDER REGISTRY (CSCPA ACT OF 2000) EFFECTIVE ON OCT 28, 2002***

In the State of Connecticut, sex offenders must register with the Department of Public Safety, and Connecticut General Statutes 54-250 through 54-261 mandate that the Connecticut Department of Public Safety establish and maintain a central registry of persons who have been convicted of certain sexual offenses. These sex offenders are required to register under the general statutes.

The State of Connecticut Sex Offender Registry can be accessed by first visiting:

<http://communitynotification.com>

For further information on any subjects listed in the registry, Connecticut General Statute 29-11 authorizes the Department of Public Safety to release to any person a state criminal conviction record for a fee of \$25.

## ***TIMELY WARNING POLICY***

In the event that a situation arises either on or off campus, a “Timely Warning” may be distributed, based on the judgment of the Director of Campus Safety, in consultation with the Dean of Campus Life and Vice President for Student Affairs, the Communications Office, and/or the Title IX Coordinator. When a situation constitutes a serious and ongoing threat to persons as well as property, Timely Warnings can be published through bulletins, e-mails, or texts or on the College’s website to inform the College community of the known facts of an incident or to publicize patterns of criminal activity in order to assist members of the Trinity community in preventing further incidents. Timely Warnings also include reminders of services available, such as campus shuttle services, walking escorts, emergency call boxes, and other recommendations.

It is irrelevant whether the victims or perpetrators of a crime are members of the campus community. The Campus Safety Department will post a campus wide Timely Warning alert especially in all situations that could pose an immediate, serious, or continuing threat to the students, faculty, staff, and individuals in the Trinity College community and is reported to a Campus Security Authority or the Campus Safety Department.

The substance of the Timely Warning is carefully determined. When issuing a Timely Warning, the names of the victims remain confidential. If information is known, and if the inclusion of such information would not compromise law enforcement efforts, Timely Warnings include a description of the crime, its location, and injuries, if any, to victim(s).

The Clery Act mandates Timely Warnings only for Clery-reportable crimes.

## ***EMERGENCY RESPONSE AND NOTIFICATION***

The Trinity College Emergency Management Plan is available at the Campus Safety website:

<https://www.trincoll.edu/campus-safety/Pages/Emergency.aspx>

The Emergency Management Team is an assemblage of College officials appointed by the President to advise and assist in making emergency-related policy decisions. The Emergency Management Team is responsible for the development and execution of the College's Emergency Management Plan. The Emergency Management Plan (EMP) is intended to establish policies and organizational structure for response to emergencies that are of sufficient magnitude to cause a significant disruption of the functioning of all portions of the College. This plan describes the roles and responsibilities of departments, offices, units, and personnel during emergency situations. The basic emergency procedures are designed to protect lives and property through effective use of College and community resources. Upon the confirmation of a significant emergency or dangerous situation occurring on campus involving an immediate threat to the health or safety of students or employees, and taking into account the safety of the campus community, a member of the Emergency Management Team will notify the campus community, **without delay** via TrinALERT, the College's emergency notification system. The notification will be made unless doing so would compromise efforts to assist a victim, contain the emergency, respond to the emergency, or otherwise mitigate the emergency. In cases of isolated emergencies that do not have the potential to affect a large portion of the campus, the Emergency Management Team may elect to limit the distribution of notifications to specific segments of the campus community. The Emergency Management Team will determine what information is appropriate to disseminate at different points in time and to which segments of the community. Depending upon the situation, alerts may also be sent to the parent/guardian contacts within TrinALERT as registered by students. The larger community can view information posted on the College website or provided to the media.

To facilitate a rapid dissemination of information, TrinALERT has templates and scripted messages that can be quickly customized to describe the emergency and provide emergency instructions. TrinALERT notifications can be simultaneously broadcast in multiple formats depending on the type of incident, such as:

- Voice messages to cell, office, and home phones
- Text messages to mobile devices capable of receiving text messages
- E-mails to all Trinity addresses and an alternate provided by individuals
- Announcements on websites – trincoll.edu and Trinity Today

### **PROCESS TO CONFIRM THAT THERE IS A SIGNIFICANT EMERGENCY AND NOTIFICATION**

Plan activation begins at the discretion of the Chairperson of the Emergency Management Team upon receipt of information of an emergency event or threat of an emergency. Based on confirmation from Campus Safety and information obtained from local first responders and/or the National Weather Service, the Chairperson of the Emergency Management Team will assess the emergency and activate the emergency management plan to the extent necessary to control the situation.

Every student and staff member is responsible for providing and maintaining his/her up-to-date personal contact information via the 'urgent communication' fields within TCOOnline (PeopleSoft) so that they can be included in emergency broadcasts via TrinALERT. Full-scale tests of TrinALERT are conducted and publicized annually. The full-scale test allows us to identify and resolve any potential issues as well as familiarize the community with the system. Further information about TrinALERT can be found at the following address:

## ***MISSING STUDENT PROCEDURE***

Under the Higher Education Opportunity Act (Public law 110-315), all Title IV institutions providing on-campus student housing must establish a missing student notification policy and procedures for those who reside on campus.

All Trinity students living in an on-campus student housing facility have the option to register a confidential contact person to be notified in case the student is determined to be missing. Only Authorized Campus Officials and law enforcement officers in furtherance of a missing person investigation have access to this information.

All Trinity students living in an on-campus student housing facility have the option to register one or more confidential contact(s) with:

- Registrar's Office at Trinity Commons
- Dean of Students Office at Hamlin Hall

In the event a student has been officially determined to be missing and he/she has not registered a contact person, the local law enforcement authorities will be notified that the student is missing. All students are advised that any missing student younger than 18 years of age and not emancipated will have his or her parent or guardian notified in addition to any confidential contact and local law enforcement officials.

### **SPECIFIC PROCEDURES**

When a member of the campus community becomes aware that a student is missing, it is urgent to immediately notify Campus Safety. Upon receiving a report, the Campus Safety Department will investigate and determine if the student has been missing from campus housing for a 24-hour period. Campus Safety also will determine whether circumstances warrant a faster implementation.

Upon determining a student is missing, the Campus Safety Department will notify local law enforcement immediately with relevant and known information concerning the missing student, such as:

- Name and description of the student
- Location and time last seen
- Name of the person last seen with student if available
- Description of vehicle student is driving
- Destination (and time of expected arrival)
- Name of student's parent(s) or guardian(s)
- Any medical issues
- Locations of places the missing student may frequently visit
- Name of missing student's companion(s) or colleague(s)

The Dean of Students and College-authorized officials will be notified. The Dean of Students will notify the President. A College alert of a student missing from on-campus housing will be issued (with photo if possible). The Dean of Students and Campus Safety will issue the alert. The Dean of Students will meet with or make contact with the student's parent or guardian. Counseling will be provided to Trinity students (determined by the Dean of Students if needed). A complete student incident report will be written by a Campus Safety Officer and Supervisor with all details of the incident.

## ***ANNUAL SECURITY REPORT***

The Director of Campus Safety prepares this report to comply with the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act. The annual fire safety report is also included in this report. The report is publicly available at the following website:

<https://www.trincoll.edu/campus-safety/Pages/Annual.aspx>

This report is prepared in cooperation with local law enforcement agencies surrounding our campus and sites abroad.

Campus crime, arrest, and referral statistics include those reported to Trinity College Campus Safety Department-designated campus officials, including, but not limited to, department directors, deans, department heads, judicial authorities, athletic coaches, and local law enforcement agencies (Hartford Police Department, East Hartford Police, and Connecticut State Police). This report includes statistics for the previous three years concerning reported crimes that occurred on campus, in certain off-campus buildings or property owned or controlled by Trinity College and public property within, or adjacent to and accessible from the campus. The report also includes policies concerning campus security, such as policies concerning sexual assaults and other matters.

By October 1 of every year, a letter announcing the release of the Annual Report is posted on the Trinity Today website for the campus community, and an e-mail is sent to all enrolled students, faculty, staff, and current employees. Hard copies of the report are available at the Campus Safety headquarters located at 76 Vernon Street, (860) 297-3333, or at the Dean of Students Office at Hamlin Hall, (860) 297-2156.

The Clery Act requires institutions to disclose statistics of crimes that occurred in these locations:

### **CLERY GEOGRAPHIC LOCATIONS AND DEFINITIONS**

- **CAMPUS** – Any building or property owned or controlled by an institution within the same reasonably contiguous geographic area and used by the institution in direct support of, or in a manner related to, the institution’s educational purposes, including residence halls; and

Any building or property that is within or reasonably contiguous to paragraph (1) of this definition, that is owned by the institution but controlled by another person, is frequently used by students, and supports institutional purposes (such as a food or other retail vendor).

- **RESIDENCE HALLS** – A subset of dormitories or other residential facilities for students on campus.
- **NON-CAMPUS** – Any building or property owned or controlled by a student organization that is officially recognized by the institution; or any building or property owned or controlled by an institution that is used in direct support of, or in relation to, the institution’s educational purposes, is frequently used by students, and is not within the same reasonably contiguous geographic area of the institution.
- **PUBLIC PROPERTY** – All public property, including thoroughfares, streets, sidewalks and parking areas that are within the campus or immediately adjacent to and accessible from campus.

## ANNUAL CRIME STATISTICS

Criminal Offenses	2016				2017				2018			
	On Campus	Student Housing	Non-Campus	Public Property	On Campus	Student Housing	Non-Campus	Public Property	On Campus	Student Housing	Non-Campus	Public Property
Aggravated Assault	1	0	0	4	0	0	2	2	1	1	0	5
Arson	1	0	0	0	1	1	0	0	1	0	0	0
Burglary	10	7	3	0	6	6	2	0	8	3	3	0
Murder / Manslaughter (Non-Negligent)	0	0	0	0	0	0	0	0	0	0	0	0
Murder / Manslaughter (Negligent)	0	0	0	0	0	0	0	0	0	0	0	0
Motor Vehicle Theft	1	0	3	0	2	0	0	0	1	0	0	0
Robbery	2	1	0	0	0	0	0	1	0	0	0	1
<b>Sex Offenses: (Forcible)</b>												
<i>Forcible Rape</i>	7	7	0	0	14	14	0	0	12	12	4	0
<i>Fondling</i>	12	1	2	0	9	6	3	1	3	0	1	0
<b>Sex Offenses: (Non-Forcible)</b>												
<i>Statutory Rape</i>	0	0	0	0	0	0	0	0	0	0	0	0
<i>Incest</i>	0	0	0	0	0	0	0	0	0	0	0	0
<b>Domestic Violence</b>	0	0	0	0	1	1	0	0	0	0	0	0
<b>Dating Violence</b>	6	5	0	0	7	5	0	0	2	2	0	0
<b>Stalking</b>	3	2	0	0	3	1	0	0	1	0	2	0
Arrests	2016				2017				2018			
	On Campus	Student Housing	Non-Campus	Public Property	On Campus	Student Housing	Non-Campus	Public Property	On Campus	Student Housing	Non-Campus	Public Property
Alcohol	0	0	0	0	0	0	0	0	0	0	0	0
Drugs	0	0	0	1	0	0	1	3	0	0	0	0
Weapons Possession	0	0	0	0	0	0	0	0	0	0	0	0
Disciplinary Actions												
	On Campus	Student Housing	Non-Campus	Public Property	On Campus	Student Housing	Non-Campus	Public Property	On Campus	Student Housing	Non-Campus	Public Property
Alcohol	167	158	0	0	102	102	0	2	46	44	0	0
Drugs	83	73	1	0	71	70	0	0	71	71	0	0
Weapons Possession	0	0	0	0	0	0	0	0	0	0	0	0

In 2018, zero (0) crime reports were determined to be unfounded.

**DISCLOSURE OF HATE CRIMES**

**2016 Hate Crime Reporting**

In 2016, Trinity College received one reported incident of destruction damage: vandalism to property motivated by bias of Race that occurred On Campus

**2017 Hate Crime Reporting**

In December 2017 - one Hate Incident was reported - Destruction Damage Vandalism to Property based on Gender and Religion that occurred On Campus

**2018 Hate Crime Reporting**

In April 2018 - one Hate Incident was reported - Destruction Damage Vandalism to Property based on Race that occurred On Campus in Student Housing

*The Office of Study Away reported the following 2018 crime statistics:*

<b>Trinity College 2018 Disclosure of Crimes Reported to Campus Safety and Other Administrative Entities for the Office of Study Away</b>			
<b>Type of Incidents Reported to Campus Safety</b>	<b>Total 2016</b>	<b>Total 2017</b>	<b>Total 2018</b>
Aggravated Assault	0	0	0
Arson	0	0	0
Burglary	0	0	0
Hate Crime	0	0	0
Murder Manslaughter (Non-Negligent)	0	0	0
Murder Manslaughter (Negligent)	0	0	0
Motor Vehicle Theft	0	0	0
Robbery	0	0	0
Sex Offenses: (Forcible)	0	0	0
Sex Offenses: (Non-Forcible)	0	0	0
Domestic Violence	0	0	0
Dating Violence	1	0	0
Stalking	0	0	0

## *THE DAILY CRIME AND FIRE LOG*

The Trinity College Campus Safety Department maintains a log of crimes and fires reported to Campus Safety. The log includes all reported crimes and fires that occurred on campus, in or on non-campus buildings or property, on public property within the campus or immediately adjacent to and accessible from the campus, and within the patrol jurisdiction of the Campus Safety Department.

The Trinity College crime and fire log for the most recent 60-day period is open to public inspection, upon request, during normal business hours of 8:00 a.m. to 4:00 p.m. at Campus Safety Headquarters (76 Vernon Street). Requests for records older than 60 days should be made to the Director of Campus Safety.

The crime and fire log contains the following information:

- The nature of the crime or fire
- The date the crime or fire was reported
- The date and time it occurred
- The general location of the crime or fire
- The disposition of the complaint, if known

The names of victims will be redacted for public inspection. Trinity College may temporarily withhold information in some cases if there is clear and convincing evidence that the release of information would:

- Jeopardize an ongoing investigation;
- Jeopardize the safety of an individual;
- Cause a suspect to flee or evade detection; or
- Result in the destruction of evidence.

Information will be disclosed once the adverse effect is no longer likely to occur.

## ***EMERGENCY MANAGEMENT PLAN***

### **PURPOSE**

The Emergency Management Plan (EMP) is intended to establish policies, procedures, and organizational structure for response to emergencies that are of sufficient magnitude to cause a significant disruption of the functioning of all or portions of the College. The plan describes the roles and responsibilities of departments, schools, units, and personnel during emergency situations. The basic emergency procedures are designed to protect lives and property through effective use of College and community resources. Since an emergency may be sudden and without warning, these procedures are designed to be flexible in order to accommodate contingencies of various types and magnitudes.

### **SCOPE**

The plan is a College-level plan that guides the emergency response of College personnel and resources during an emergency situation. It is the official emergency response plan of the College and precludes actions not in concert with the intent of this plan or the organization created by it. However, nothing in this plan shall be construed in a manner that limits the use of good judgment and common sense in matters not foreseen or covered by the elements of the plan.

This plan and organization shall be subordinate to federal, state, or local plans during a disaster declaration by those authorities. This Emergency Management Plan is consistent with established practices relating to coordination of emergency response. Accordingly, this plan incorporates the use of the Incident Command System to facilitate interagency coordination, promote the use of common emergency response terminology and command structure, and facilitate the flow of information between responding agencies.

This plan was reviewed and updated in accordance with CT General Statute Sec. 92. Section 10a-156a. The College will cooperate with the Division of Emergency Management and Homeland Security; state and city police; and other responders in the development of emergency response plans and participate in multi-jurisdictional emergency planning exercises.

### **Emergency Notification**

Should it be deemed necessary to warn the College community of an impending threat or emergency situation, the Emergency Management Team is designated to direct the College Communications Center (Campus Safety) to activate warning resources and activities. The College Communications Center will broadcast emergency messages via the TrinALERT system network, as appropriate. In outdoor spaces, Campus Safety Officers will use megaphones to relay emergency information. In addition, several buildings utilized by the general public have been equipped with Alertus emergency beacons that display emergency alerts and instructions. In buildings equipped with public address systems, building officials can use these systems as directed by Campus Safety.

### **Meetings and Exercises**

The Core Emergency Management Team meets monthly on the second and fourth Thursday and as needed due to planned or unplanned events. The team is responsible for annually testing the Emergency Management Plan or any part thereof. Upon completion, an after action review is held and a report generated.

The Emergency Management Plan can be accessed at the following Trinity College Campus Safety website:

<https://www.trincoll.edu/campus-safety/Pages/Emergency.aspx>



## ***ANNUAL FIRE SAFETY REPORT***

The Final Rule published in Federal Register of October 29, 2009, specifies amendments to the Department of Education's Higher Education Opportunity Act of 2008 (HEOA). Section 488(g) of the HEOA amended Section 485 of the Higher Education Act, establishing requirements for institutions providing on-campus student housing to annually publish a fire safety report, maintain a fire log, and report fire statistics to the Department of Education annually, similar to the annual security report.

The on-campus student housing at Trinity College included in this report consists of residence halls and properties owned by the College, which are on or adjacent to campus, and social houses where students may reside. The College used the definition of on-campus student housing as "a dormitory or other residential facility for students that is located on an institution's campus" as the boundaries for this report. Rental properties owned by the College but managed by a property management company, as well as properties owned by other property owners, were included in this report in accordance with the proposed rule's clarification that "a student housing facility that is on property owned by an institution, even if the building is owned and maintained by a student organization or other party, would be considered an on-campus student housing facility."

The following tables describe the fire systems for each on-campus student housing facility. Portable fire extinguishers are available only in mechanical spaces and are not required in the living areas of the dormitories under Connecticut State Fire Code or by the Hartford Fire Marshall.

**RESIDENCE HALLS**

All residence halls are fully equipped with sprinklers and a networked fire alarm system, which reports directly to Campus Safety. The detectors and fire pull stations activate horns and strobe lights. All smoke detectors in residential halls are addressable, meaning the issue detected can be traced to a specific location. The fire detection, alarm, and sprinkler systems are connected to backup power so they are functional during a power outage. Some dormitories, as indicated below, are also directly connected to the Hartford Fire Department.

<b>Residence Hall</b>	<b>Fire Alarm Monitored by Campus Safety</b>	<b>Alarm Monitored by Fire Dept.</b>	<b>Sprinkler</b>	<b>Fire Drill Dates</b>
Boardwalk	Networked/Addressable	No	Yes	04/02/18
Clemens	Networked/Addressable	No	Yes	04/05/18
Cook	Networked/Addressable	Yes	Yes	03/29/18
Doonesbury	Networked/Addressable	No	Yes	04/02/18
Crescent St. Townhouse 1	Networked/Addressable	No	Yes	04/05/18
Crescent St. Townhouse 2	Networked/Addressable	No	Yes	04/05/18
Crescent St. Townhouse 3	Networked/Addressable	No	Yes	04/05/18
Crescent St. Townhouse 4	Networked/Addressable	No	Yes	04/05/18
Crescent St. Townhouse 5	Networked/Addressable	No	Yes	04/05/18
Elton	Networked/Addressable	No	Yes	03/29/18
Funston	Networked/Addressable	Yes	Yes	03/26/18
Goodwin/Woodward	Networked/Addressable	Yes	Yes	03/29/18
Hansen Hall	Networked/Addressable	Yes	Yes	04/02/18
High Rise	Networked/Addressable	Yes	Yes	04/02/18
Jackson	Networked/Addressable	Yes	Yes	03/26/18
Jarvis	Networked/Addressable	No	Yes	03/29/18
Jones	Networked/Addressable	No	Yes	03/29/18
North Campus	Networked/Addressable	No	Yes	04/02/18
Northam	Networked/Addressable	No	Yes	03/29/18
Ogilby	Networked/Addressable	No	Yes	04/02/18
Park Place	Networked/Addressable	No	Yes	04/02/18
Smith	Networked/Addressable	Yes	Yes	03/26/18
Stowe	Networked/Addressable	No	Yes	04/05/18
Summit East	Networked/Addressable	Yes	Yes	04/05/18
Summit North	Networked/Addressable	Yes	Yes	04/05/18
Summit South	Networked/Addressable	Yes	Yes	04/05/18
Vernon Place	Networked/Addressable	Yes	Yes	04/02/18
Wheaton	Networked/Addressable	Yes	Yes	03/26/18

**CULTURAL HOUSES**

<b>Address</b>	<b>Fire Alarm Monitored by Campus Safety</b>	<b>City Connect</b>	<b>Sprinkler</b>
65 Vernon St. (ASSA)	Networked/Addressable	No	No
69 Vernon St. (La Voz Latina)	Networked/Addressable	No	No
72 Vernon Street (UMOJA)	Networked/Addressable	No	No

***RENTAL PROPERTIES***

Trinity College owns a number of rental houses on or adjacent to the campus. They are not maintained by the Trinity College Facilities Department, but are managed by property management companies. They are included in this report due to the potential for Trinity College students renting apartments from the property management company. Each of the rental units is equipped with smoke detectors, as well as common areas in each building. The smoke detectors in the rental properties do not report to Campus Safety or to the Hartford Fire Department.

<b><u>Address</u></b>	<b><u>Fire Alarm</u></b>	<b><u>City Connect</u></b>	<b><u>Sprinkler</u></b>
105-107 Allen Place	battery powered smoke detectors	No	No
129 Allen Place	battery powered smoke detectors	No	No
141-143 Allen Place	battery powered smoke detectors	No	No
145-147 Allen Place	battery powered smoke detectors	No	No
149-151 Allen Place	battery powered smoke detectors	No	No
155-157 New Britain Ave.	battery powered smoke detectors	No	No
1580 Broad Street	Stand-alone system	No	No, standpipes
1705-1707 Broad Street	battery powered smoke detectors	No	No
1713-1715 Broad Street	battery powered smoke detectors	No	No
199-201 Allen Place	battery powered smoke detectors	No	No
209-211 Zion Street	battery powered smoke detectors	No	No
213-219 Zion Street	battery powered smoke detectors	No	No
225-227 Zion Street	battery powered smoke detectors	No	No

## Fire Drills

Trinity College performs regular mandatory supervised fire drills semiannually in all dormitories and College-owned social houses. Drills are conducted by the Offices of Residential Life, Campus Safety, Environmental Health & Safety, and the Hartford Fire Department. During each drill, evacuation procedures are practiced, and building fire alarm systems are tested.

## Evacuation Procedures

In case of visible smoke or fire:

- Pull the fire alarm before doing anything else.
- Dial Campus Safety, (860) 297-2222, and/or the Hartford Fire Department (9-911).
- Give your location, the nature of the fire, and your name.
- Do not attempt to extinguish the fire.
- Close doors and windows in the area as you evacuate.
- Provide assistance to mobility-impaired individuals if possible.
- Each building has a prearranged rally point to account for occupants and to await further instructions.
- Do not re-enter the building until told to do so by Campus Safety.
- Report damage to Campus Safety.

All staff must be familiar with the location and proper use of all fire and life safety equipment in their building, including alarm systems, emergency telephones, fire doors and exits, and evacuation routes. Fire extinguishers are only to be used by trained personnel.

Do not use elevators. Should the fire involve the control panel of the elevator or the electrical system of the building, power in the building may be cut and you could be trapped between floors. Also, the elevator shaft can become a flue, lending itself to the passage and accumulation of hot gases and smoke generated by the fire.

Outside gathering locations are away from building entries to permit unobstructed entry by emergency personnel. Residents and staff are made aware of the gathering spot and appropriate evacuation routes, and floor plans are posted throughout campus. People should be reminded to wear appropriate outdoor clothing when evacuating buildings. During inclement weather, alternative gathering places will be chosen based on the building being evacuated. Those locations will be communicated by Campus Safety and key personnel.

If there is smoke and/or fire evident, sound the alarm by pulling a fire alarm pull station. This will notify Campus Safety and will sound the evacuation horns in the building. If you have more detailed information, i.e., exact location of the fire, what is burning and how large the fire is, use the outside call box to call Campus Safety and advise them as soon as possible. In a fire, seconds count. Campus Safety will notify the local fire department that there is an actual emergency.

**ALL OCCUPANTS MUST EVACUATE IMMEDIATELY WHEN A BUILDING FIRE ALARM SOUNDS AND MUST NOT RE-ENTER UNTIL THE ALL CLEAR IS GIVEN BY CAMPUS SAFETY.**

**EVACUATE THE BUILDING USING THE MOST EXPEDIENT AND SAFE ROUTE. ONCE OUTSIDE, PROCEED TO THE DESIGNATED GATHERING SPOT. STAFF SHOULD ASCERTAIN IF ANYONE IS KNOWN TO STILL BE INSIDE THE BUILDING.**

The senior staff person on the scene should meet the responding Campus Safety and/or fire officials and:

- Identify self and staff position.
- Inform emergency personnel of any known remaining occupants and pertinent information (whether someone is wheelchair-bound, ill, etc.).
- Provide building information as appropriate or requested (location of fire, activated alarm, annunciator panel).

Residential staff seniority is:

- Administrator-On-Call
- Area Coordinators
- RA/HR-on-call
- RA/HR of building

Building fire alarms are wired to the Campus Safety station and should receive near immediate response. If emergency personnel are not on the scene when you reach the outside, use the closest available campus telephone or emergency telephone to notify Campus Safety of the alarm.

If an emergency exists, telephone Campus Safety after activating the building fire alarm system, via a pull station.

#### **EMERGENCY PERSONNEL:**

Once a building fire alarm has sounded, the following seniority exists until an “all-clear” is issued:

- Fire Department (officers wear white hats)
- Campus Safety Department
- Administrator-On-Call or Department Head
- Residential/Building Staff

NEVER argue with a fire or Campus Safety Officer. Disagreements or questions should be brought to the Director of Residential Life after the incident.

#### **ALL-CLEAR:**

Building occupants may re-enter only upon the instructions of the fire department or Campus Safety. Staff may not enter the building nor authorize entry until after receiving an “all clear” from the Campus Safety Officer on the scene. In the absence of identified staff, the Campus Safety Officer will notify people directly that the building may be entered. The departure of all emergency personnel from the scene will be considered an “all clear.”

#### **ALARM RESET:**

Activated alarms must be reset or replaced to ensure a proper warning system for occupants. In most instances, the reset will be accomplished by the emergency personnel prior to issuing the “all clear.” If the alarm system cannot be made operational by the personnel on the scene, Campus Safety will summon appropriate personnel to restore the system to active status. The Campus Safety shift supervisor is responsible for monitoring the status of campus alarm systems and will determine whether a safe or unsafe condition exists. If an unsafe condition exists due to the lack of a properly operating alarm system, the shift supervisor will post a “Security Alert” and establish a fire watch staffed by Campus Safety Officers or contracted personnel.

## **PERSONS NEEDING ASSISTANCE**

Individuals with disabilities needing assistance should be informed of evacuation procedures and routes for all areas of campus and should know to call Campus Safety immediately for assistance. In all instances, evacuation routes should be horizontal, (i.e., traveling on the same floor level and passing from one building to another), where possible. If horizontal evacuation is not available, consider heading for the nearest enclosed stairwell landing away from any obvious danger, and notify Campus Safety of the exact location of the stairwell. The responding officer may have additional recommendations to ensure your safety. Once at the stairwell, wait for the majority of traffic to pass before entering the stairwell. Enter the landing and wait for Campus Safety or the Fire Department to assist you.

If these areas are not available or practical, find a “refuge area” where you can inform Campus Safety and safely wait. The “refuge area” should be a room of well-constructed walls of masonry or sheet rock that go from floor to slab; no open holes in walls to the room to the corridor; tight fitting doors; outside windows; a working telephone; no flammable liquids or chemicals storage. If a phone is unavailable, try signaling help from a window or pulling another fire alarm. The fire panels can be checked by the Fire Department to determine the location of pulled alarms. This can be used to help find individuals with disabilities.

## **SPECIAL CARE OF HANDICAPPED/MOBILITY CHALLENGED STUDENTS**

The Trinity College community is composed of a large, diverse student population spread out across the 100-acre campus. In each class of undergraduates, it is likely that one or more of the students will have special needs due to mobility or illness issues. Campus Safety will work with the Office of Residential Life to identify such persons and set special policies and procedures to safeguard them in times of emergency on campus.

Once identified, the members of the Trinity College community needing special assistance in times of emergency situations will be sought out and taken care of by on-duty Campus Safety staff.

City Emergency Services will be advised of these individuals and the special circumstances of each to allow the Campus Safety Department and City Emergency Services to work together to safeguard them. This will be done at all times of emergency circumstances on campus.

## **FIRE PREVENTION**

The *Trinity College Student Handbook* describes the College’s fire safety program and policies. The paragraphs below are taken directly from the handbook.

Fire safety is a serious matter, and it is the responsibility of every resident to protect himself/herself as well as fellow residents. Covering and/or tampering with a smoke detector endangers not only your life but also the lives of everyone in the residence hall. Time is a crucial element when responding to a fire, and covering or tampering with fire safety equipment can significantly impact a professional response. Please remember the following:

- Do not overload electrical outlets, and make sure extension cords are used properly.
- Do not cover and/or tamper with smoke detectors for any reason at any time.
- Do not smoke in College buildings.
- Do not use candles/incense in your room.
- Do not leave cooking equipment unattended when in use (even microwaves).
- Do not leave lamps on when you are not in your room.
- Know at least two ways out of your residence hall.
- Never disregard fire alarms. Immediately exit the residence hall or building when an alarm sounds.

- Residents must familiarize themselves with emergency exit locations and evacuation procedures.
- When a fire alarm sounds, all students are required to evacuate the residence hall. The directions of staff, Campus Safety, and fire safety officers are to be followed at all times. Failure to evacuate a building when a fire alarm sounds and/or at the request of a College or fire department official will result in disciplinary action.
- Intentionally sounding (pulling) a false alarm, making a false emergency call, attempting to ignite and/or igniting a substance on fire, issuing a bomb threat, constructing mock explosive devices, or tampering with, destroying, and/or possession of fire equipment, emergency signs, and sprinklers are prohibited. Such action is considered to be in violation of state and local ordinances. Abuse of fire safety systems may result in (1) the levying of financial damages up to \$1,000, (2) immediate eviction, and/or (3) indefinite restriction from campus residence. The residents of an entire building may be billed for common area damages (false alarms) when the responsible party/parties are unknown.
- Fire alarm pull stations, fire extinguisher cabinets, smoke detectors, and exit signs must not be covered, and exits must remain free from obstruction at all times. Even temporary obstruction of such items is prohibited.
- Safety inspections will be conducted by Residential Life staff members each semester in order to determine compliance with safety regulations. Restricted items may be removed during such inspections.

#### **PROHIBITED ITEMS:**

Out of regard for fire and personal safety, the following items are among those prohibited in the residence halls:

- Prohibited items include: candles, incense, air conditioners, waterbeds, halogen lamps, open-coiled electrical or heating appliances, including toasters, toaster ovens, hot plates (including George Forman-style grills), barbecue grills, broilers, space heaters, immersion heaters, and ovens, and use or storage of any type of flammable liquid.
- Small refrigerators, microwaves, and electric coffeepots, hot pots, and tea kettles (with automatic shut-off) are permitted if they are UL (Underwriters Lab, Inc.) listed. Amperage limitations may be imposed.
- Decorative wall coverings must not cover any room fixtures (lights, sprinkler systems, etc.) or hang freely from the ceiling.
- Use of darts and dartboards in any area of the residence halls are prohibited.
- Construction of lofts of any type is prohibited.
- Cement-type blocks (cinder, etc.) are prohibited.
- Holiday trees must be artificial, and holiday lights must be UL-approved and low wattage. Holiday lights must not come into contact with flammable wall hangings.
- Antennas, satellite dishes, or other external devices are prohibited from the exteriors of the residence halls.
- Extension cords must be in the form of “surge-protectors” or heavy-duty (indoor-outdoor) quality.
- The outdoor use of barbecue grills and/or hibachis must take place at least 20 feet from College buildings. Such items (and charcoal, lighter fluid, etc.) may not be stored in residential spaces under any circumstances and will be subject to confiscation and disposal.
- The unauthorized use, possession, manufacture, sale, or distribution of weapons such as firearms, air rifles, ammunition, explosives, hand weapons, or fireworks or any kind are prohibited.

## ***FIRE LOG***

The Fire Log is maintained by Campus Safety. The statistics gathered for 2014-2016 are compiled and reported in the October 1, 2017, report. The 2016 Fire Safety Report contains statistics concerning the number of fires in on-campus student housing, the cause of each fire, the number of injuries and deaths as a result of each fire, and the amount of property damage caused by each fire, if applicable.

## ***FIRE STATISTICS***

The following statistics must be collected and reported both in the Annual Fire Safety Report and The Department of Education's Web-based data collection system for each on-campus student housing facility.

The number of fires and the cause of each fire are included. The causes and categories used are:

Unintentional Fire

Cooking

Smoking Materials

Open Flames

Electrical

Heating Equipment

Hazardous Products

Machinery/Industrial

Natural

Other

Intentional Fire

Undetermined Fire

The number of deaths related to the fire

The number of injuries related to the fire that resulted in treatment at a medical facility

The value of property damage related to the fire



## *FIRE STATISTICS*

2016

<b>Date &amp; Time of Fire</b>	<b>Name of Housing Facility</b>	<b>Address</b>	<b>Cause of Fire</b>	<b>Fire related injuries</b>	<b>Fire Related Deaths</b>	<b>Property Damage</b>
07/25/2016 at 22:00	Summit North (laundry room)	300 Summit Street	unintentional caused by dryer vent clogged with lint	0	0	\$0

In 2016, one fire occurred in on-campus student housing at Trinity College.

2017

<b>Date &amp; Time of Fire</b>	<b>Name of Housing Facility</b>	<b>Address</b>	<b>Cause of Fire</b>	<b>Fire related injuries</b>	<b>Fire Related Deaths</b>	<b>Property Damage</b>
02/12/2017 at 14:14	Crescent St. Townhouse 5	80 Crescent Street	reported as Arson: paper and garbage was intentionally set next to an exterior door	0	0	\$0
03/24/2017 at 00:44	Ogilby	134 Vernon Street	unintentional caused by a portable fire pit containing hot embers placed in the basement	0	0	\$0
11/11/2017 at 02:40	High Rise	175 Allen Place	unintentional caused by a discarded cigarette in a trash barrel	0	0	\$0

In 2017, one reported arson occurred next to an exterior door and two fires occurred in on-campus student housing at Trinity College

2018

<b>Date &amp; Time of Fire</b>	<b>Name of Housing Facility</b>	<b>Address</b>	<b>Cause of Fire</b>	<b>Fire related injuries</b>	<b>Fire Related Deaths</b>	<b>Property Damage</b>

In 2018, no fires occurred in on-campus student housing.

***FIRES - ON-CAMPUS STUDENT HOUSING FACILITIES***

Fire Summary							
Name of Facility	Address	TOTALS BY YEAR			2018		
		2016	2017	2018	Fires	Injuries	Death
Boardwalk	183-85 Allen Pl.	0	0	0	0	0	0
Clemens	216 New Britain Ave.	0	0	0	0	0	0
Cook	300 Summit St.	0	0	0	0	0	0
Crescent St. Townhouse 1	9 – 25 Crescent St.	0	0	0	0	0	0
Crescent St. Townhouse 2	31 – 51 Crescent St.	0	0	0	0	0	0
Crescent St. Townhouse 3	53 – 69 Crescent St.	0	0	0	0	0	0
Crescent St. Townhouse 4	94 – 112 Crescent St.	0	0	0	0	0	0
Crescent St. Townhouse 5	76 – 92 Crescent St.	0	1	0	0	0	0
Doonesbury	90-92 Vernon St.	0	0	0	0	0	0
Elton	300 Summit St.	0	0	0	0	0	0
Funston	300 Summit St.	0	0	0	0	0	0
Goodwin/Woodward	300 Summit St.	0	0	0	0	0	0
Hansen Hall	103 Vernon St.	0	0	0	0	0	0
High Rise	175 Allen Pl.	0	1	0	0	0	0
Jackson	300 Summit St.	0	0	0	0	0	0
Jarvis	300 Summit St.	0	0	0	0	0	0
Jones	300 Summit St.	0	0	0	0	0	0
North Campus	163 Allen Place	0	0	0	0	0	0
Northam	300 Summit St.	0	0	0	0	0	0
Ogilby	134 Vernon St.	0	1	0	0	0	0
Park Place	187-89 Allen Pl.	0	0	0	0	0	0
Smith	300 Summit St.	0	0	0	0	0	0
Stowe	194-96 Crescent St.	0	0	0	0	0	0
Summit East	300 Summit St.	0	0	0	0	0	0
Summit North	300 Summit St.	1	0	0	0	0	0
Summit South	300 Summit St.	0	0	0	0	0	0
Vernon Place	114 Vernon St.	0	0	0	0	0	0
Wheaton	300 Summit St.	0	0	0	0	0	0
129 Allen Place	129 Allen Place	0	0	0	0	0	0
1715 Broad Street	1715 Broad Street	0	0	0	0	0	0
AASA	65 Vernon Street	0	0	0	0	0	0
La Voz Latina	69 Vernon Street	0	0	0	0	0	0
UMOJA	72 Vernon Street	0	0	0	0	0	0
<b>TOTAL</b>		<b>1</b>	<b>3</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>

***FIRES – RENTAL PROPERTIES***

<b>Fire Summary</b>						
<b>Address</b>	<b>TOTALS BY YEAR</b>			<b>2018</b>		
	<b>2016</b>	<b>2017</b>	<b>2018</b>	<b>Fires</b>	<b>Injuries</b>	<b>Death</b>
129 Allen Place	0	0	0	0	0	0
141-143 Allen Place	0	0	0	0	0	0
145-147 Allen Place	0	0	0	0	0	0
149-151 Allen Place	0	0	0	0	0	0
155-157 New Britain Ave.	0	0	0	0	0	0
1580 Broad Street	0	0	0	0	0	0
1705-1707 Broad Street	0	0	0	0	0	0
1713-1715 Broad Street	0	0	0	0	0	0
199-201 Allen Place	0	0	0	0	0	0
209-211 Zion Street	0	0	0	0	0	0
213-219 Zion Street	0	0	0	0	0	0
225-227 Zion Street	0	0	0	0	0	0



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