

Trinity College

HARTFORD • CONNECTICUT

Annual Security/Fire Report 2023–25

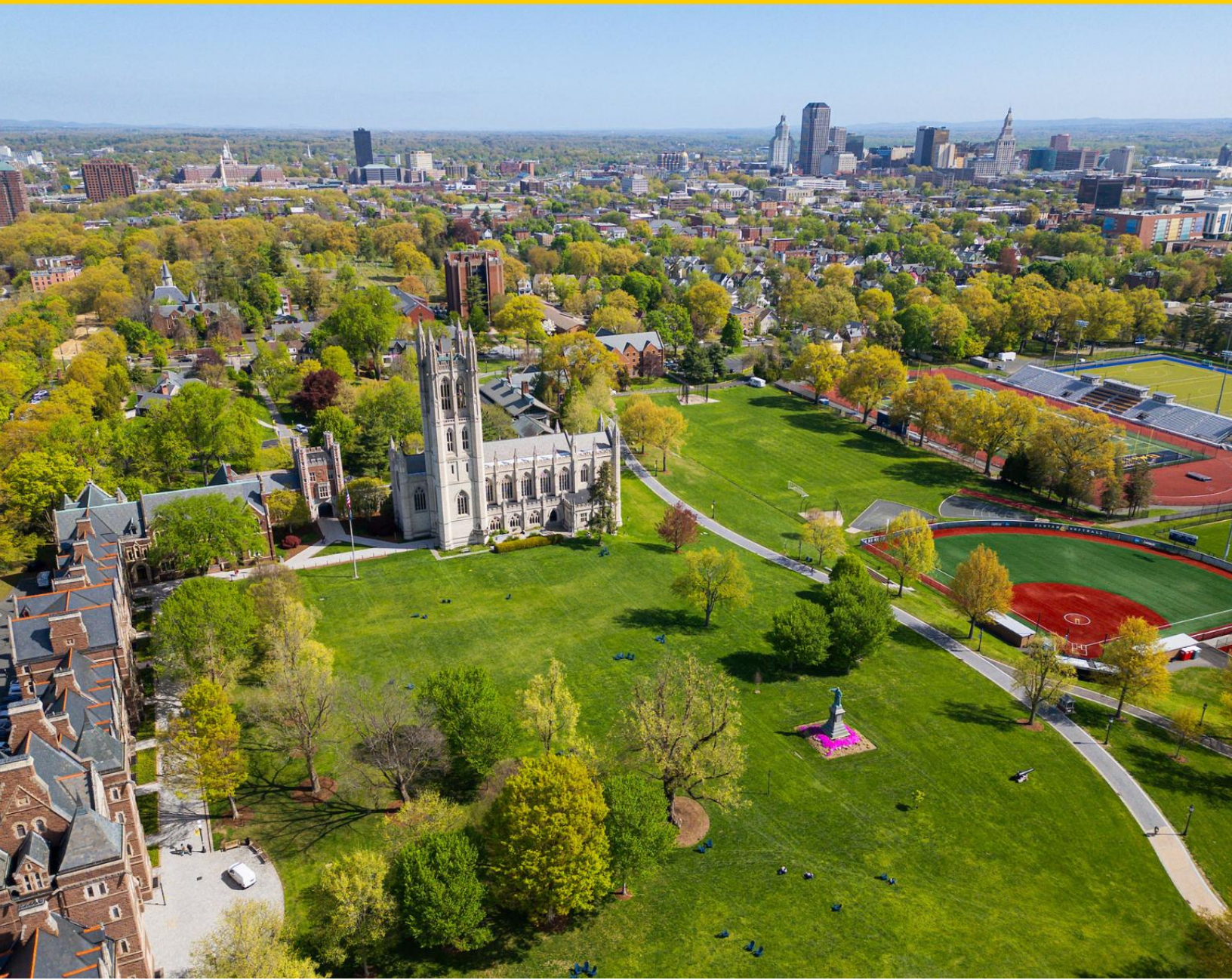


Table of Contents

<i>Welcome from the Director</i>	3
<i>The Campus Safety Department</i>	4
<i>Campus Law Enforcement Policies</i>	6
<i>Security Awareness Programs</i>	6
<i>Reporting Crimes or Emergencies</i>	7
<i>Access Control Policy</i>	9
<i>Buildings and Grounds Security</i>	10
<i>Access Control and Security Management Systems</i>	10
<i>Alcohol Policy</i>	10
<i>Drug Use Policy</i>	11
<i>Policy Concerning Weapons on Campus</i>	13
<i>Arrests or Disciplinary Referrals for Illegal Weapons Possession and Drug and Liquor Law Violations</i>	13
<i>Criminal Activity Off Campus</i>	14
<i>Campus Security Authorities</i>	15
<i>Federal and State Statutes Relating to Sexual Offenses</i>	15
Sex Offenses	15
Domestic Violence	20
<i>Dating Violence</i>	20
Stalking	20
<i>Educational and Prevention Programs</i>	21
Bystander Intervention and Risk Reduction	22
Written Explanation of Rights, Options, and Resources	23
<i>Trinity College Policy on Sexual Harassment Including Sexual Assault, Domestic Violence, Dating Violence, Stalking, and Retaliation</i>	24
Appendix A – Available Resources and Services	71
Appendix B – Appropriate College Officials	74
Appendix C–Confidential and Privileged Employees	74
<i>Trinity College Hazing Policy</i>	76
<i>Timely Warning Policy</i>	80
<i>Emergency Response and Notification</i>	80

<i>Missing Student Notification Policy and Procedures</i>	82
<i>Annual Security and Fire Safety Report</i>	84
<i>Emergency Management Plan</i>	87
<i>Annual Fire Safety Report</i>	89

Welcome from the Director

Campus Community:

Welcome to Trinity College.

The Campus Safety Department is committed to providing a safe, secure, and welcoming environment where every member of our community can live, learn, work, and thrive. Our mission extends beyond responding to emergencies—we strive to build meaningful relationships with students, faculty, staff, and visitors through professionalism, respect, integrity, and service. Safety is a shared responsibility. Every member of the Trinity community contributes to maintaining a secure campus by remaining aware of their surroundings, reporting suspicious activity, and looking out for one another.

Trinity College is proud to support the Green Dot violence prevention program, empowering community members to recognize potentially harmful situations and safely intervene before violence occurs. Together, we can foster a culture where everyone feels respected, supported, and safe.

If you ever need assistance or observe suspicious activity, please contact the Campus Safety Department at [860-297-2222](tel:860-297-2222). In an emergency, call [911](tel:911).

On behalf of the Campus Safety Department, thank you for partnering with us to make Trinity College a safe and welcoming community.

John Tollis
Director, Campus Safety Department

The Campus Safety Department

The mission of the Trinity College Campus Safety Department is to foster and maintain a safe, secure, and welcoming environment where members of the Trinity College community can live, learn, work, and thrive. We are committed to professionalism, integrity, community engagement, and collaborative partnerships that support the safety and well-being of our campus.

Reporting to the Chief Financial Officer, the Campus Safety Department is comprised of Campus Safety Officers, Sergeants, Dispatchers, and administrative personnel dedicated to serving the Trinity community. The department works closely with the Hartford Police Department, Hartford Fire Department, EMS, and other campus partners to provide comprehensive public safety services. Campus Safety personnel receive ongoing professional development and training to ensure they are prepared to respond effectively to emergencies and the evolving needs of the campus community.

The Campus Safety Department is staffed 24 hours a day, 7 days a week, 365 days a year. Officers provide continuous patrol coverage by foot, vehicle, and bicycle; respond to emergencies; investigate incidents; provide safety escorts; support campus events; and engage in proactive crime prevention and community outreach initiatives.

Campus Safety personnel participate in ongoing training in areas including emergency response, de-escalation, first aid/CPR/AED, Clery Act awareness, Title IX awareness, mental health response, customer service, and other topics relevant to campus public safety.

Department Responsibilities

The Campus Safety Department provides a broad range of public safety and security services, including:

- 24-hour emergency response and communications
- Preventive patrols by foot, bicycle, and vehicle
- Crime reporting and incident documentation
- Crime prevention and safety education
- Walking safety escorts
- Campus shuttle services
- Building access and security support
- Emergency management and incident coordination
- Special event planning and security
- Community engagement and outreach programs
- Community Support Dog program
- Coordination with local, state, and federal public safety agencies

Community Support Dog

Cooper, a Fox Red Labrador Retriever, has been a valued member of the Campus Safety Department for more than one year as Trinity College's Community Support Dog.

Cooper supports student well-being by participating in orientation programs, outreach initiatives, educational events, wellness activities, and campus programs throughout the academic year. His presence helps foster positive relationships between Campus Safety and the campus community while promoting a welcoming and supportive environment.

Campus Safety Department at a Glance

Service	Description
24/7/365 Operations	Continuous public safety coverage every day of the year
Emergency Response	Immediate response to emergencies and calls for service
Foot, Vehicle & Bicycle Patrols	Proactive patrols throughout campus
Campus Safety Escorts	Walking safety escorts available upon request
Campus Shuttle Service	On-campus and off-campus transportation during scheduled hours
Community Support Dog	Cooper provides outreach and wellness support
TrinALERT	Emergency notification system for timely campus alerts
Crime Prevention	Safety education, outreach, and awareness programs
Community Partnerships	Collaboration with Hartford Police, Fire Department, and EMS

Core Values

- Professionalism
- Integrity
- Communication
- Service
- Respect
- Loyalty

Campus Law Enforcement Policies

Campus Safety Department

The Trinity College Campus Safety Department is responsible for providing a safe, secure, and welcoming environment for students, faculty, staff, and visitors.

Campus Safety Officers are non-sworn public safety professionals who do not carry firearms and do not possess arrest powers. Officers are equipped with defensive equipment and are responsible for responding to calls for service, conducting preventive patrols, documenting incidents, enforcing College policies, providing safety escorts, and coordinating emergency response activities.

All Campus Safety Officers are licensed by the Connecticut Department of Emergency Services and Public Protection through the Division of State Police, in accordance with Connecticut requirements for security officers.

Incidents involving students may be referred to the Dean of Community Life and Standards for review under the Student Code of Conduct. Incidents involving faculty or staff may be referred to Human Resources or the appropriate administrative office.

The Campus Safety Department works in close partnership with the Hartford Police Department, which has primary law enforcement jurisdiction on and around the Trinity College campus. Campus Safety personnel routinely coordinate criminal investigations, emergency incidents, major campus events, and public safety concerns with Hartford Police. This collaborative relationship promotes the timely exchange of information and enhances the safety and security of the Trinity College community.

Campus Safety Officers also enforce College parking regulations through the issuance of parking citations and the authorization of vehicle towing when necessary in accordance with College policy.

Security Awareness Programs

Trinity College is committed to fostering a safe campus through ongoing crime prevention, safety education, and community engagement programs. Throughout the academic year, the Campus Safety Department provides educational programs designed to increase awareness, reduce crime, and encourage personal responsibility for campus safety.

Incoming students receive safety information during Orientation, including emergency procedures, crime prevention strategies, campus resources, TrinALERT emergency notifications, walking safety escort services, shuttle services, and the locations of emergency call boxes. Throughout the academic year, Campus Safety participates in and conducts presentations, outreach programs, and educational events for students, faculty, and staff. Topics may include:

- Personal safety and crime prevention
- Bystander intervention and Green Dot
- Active threat awareness
- Residence hall safety
- Alcohol and drug awareness
- Theft prevention
- Bicycle and pedestrian safety
- Scam and fraud awareness
- Emergency preparedness
- Campus resources and reporting options

Safety information is also distributed through the Campus Safety website, the Student Handbook, campus-wide email communications, social media, printed materials, and educational campaigns, covering essential topics including:

- Parking and vehicle registration
- Preventing identity theft
- Personal and property safety
- Pedestrian safety tips

Reporting Crimes or Emergencies

The Trinity College community is strongly encouraged to promptly report all crimes, suspicious activity, emergencies, and public safety concerns to the Campus Safety Department and, when appropriate, to local law enforcement.

Important Phone Numbers

Division	Phone Number
Ambulance	911 (9-911 from an on-campus phone)
Campus Safety (Routine and Emergency)	860-297-2222
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

The Campus Safety Department is situated at 76 Vernon Street and operates continuously, 24 hours a day, throughout the year. For emergency calls from College telephones, including those

within residence halls, please dial extension 2222. External callers can reach the department by contacting (860) 297-2222. For non-emergency inquiries, such as shuttle and safety escort services, call extension 3366, or (860) 297-3366 from outside the college network. Activating any of the yellow emergency call boxes stationed across campus will also establish immediate contact with the Campus Safety Department.

All incoming calls are managed by a dispatcher who maintains radio communication with the Campus Safety Officers. The dispatcher is trained to respond appropriately to each situation, which may involve deploying Campus Safety Officers or coordinating with other emergency personnel to address the reported incident.

The 911 emergency system is available; however, a “9” should be dialed first when using a college phone. This will connect the caller to the Hartford emergency services dispatch center, rather than the Campus Safety Department. For non-emergency police matters, callers are advised to utilize the Hartford Police Department's non-emergency number: (860) 757-4000.

All incidents reported to Campus Safety, including those occurring at off-campus locations affiliated with recognized student organizations, are documented and recorded in compliance with state and federal regulations. Campus Safety encourages all individuals to report any crimes committed against them to the Hartford Police Department and/or appropriate city, state, or federal law enforcement agencies. The College ensures that its crime statistics are disclosed and reported in concert with the relevant law enforcement entities.

NON-EMERGENCY/ADMINISTRATIVE LINE (860) 297-3366

Emergency Call Boxes

Yellow emergency call boxes are strategically located throughout campus and provide immediate communication with the Campus Safety Department Communications Center. When activated, the caller is connected directly with a dispatcher who can identify the location of the activated call box and dispatch the appropriate emergency response. Emergency call boxes are inspected and tested periodically to ensure proper operation.

Public access Automated External Defibrillators (AEDs) are also located throughout campus to assist during medical emergencies.

Voluntary Confidential Reporting

The Campus Safety Department encourages accurate and prompt reporting of all crimes. Individuals who prefer not to pursue criminal or disciplinary action are encouraged to submit a confidential report whenever possible. Confidential reports assist the College in identifying crime

trends, assessing potential threats, improving safety initiatives, and maintaining accurate Clery Act statistics.

Information regarding sexual misconduct, dating violence, domestic violence, and stalking is shared with the Title IX Coordinator consistent with applicable law and College policy.

Anonymous reporting remains available through the online reporting form on the Campus Safety website.

<https://www.trincoll.edu/campus-safety/anonymous-reporting/>

You may also consult confidentially with licensed professionals at the College's Counseling & Wellness Center, or with individuals under their clinical supervision, as well as with the College's ordained chaplains. These individuals are bound by recognized legal and ethical privileges that prohibit the disclosure of information shared with them in their professional or ecclesiastical roles, unless consent is provided by the individual who disclosed the information. In Connecticut, ordained clergy enjoy absolute privilege; however, professional counselors may be required to disclose confidential information to protect life or ensure safety.

Access Control Policy

Residence hall security is a shared responsibility among the Campus Safety Department, Residential Life, Facilities Management, and student residents.

Residence hall exterior doors remain secured, and access is restricted to authorized individuals through the College's electronic access control system. Students are encouraged to keep room doors locked and never share access credentials with others.

Campus Safety personnel conduct regular patrols and building security checks throughout the year. During periods of reduced campus occupancy, additional inspections are conducted to ensure the security of campus facilities.

Students living in college housing are accountable for the conduct of their visitors and guests. College policies strictly prohibit sharing personal access codes with unauthorized individuals. Residents receive information regarding these regulations and other relevant policies on residential security during new student orientation and when they sign the Residential Contract prior to moving in. The enforcement of these rules is carried out by the Residential Life staff, Campus Safety Officers, and administrators from the Dean of Community Life and Standards Office.

Continued education on residential security matters is provided through programs and meetings within the residence halls. Additionally, Campus Safety is actively engaged in raising student awareness through newsletters, publications, and timely alerts sent via email.

Buildings and Grounds Security

The College is committed to ensuring the safety and security of its facilities and grounds. Campus Safety and custodial staff secure academic and administrative buildings each day after classes and business activities conclude. Students are encouraged to avoid studying in isolated areas of the campus and instead utilize study lounges located in residential halls or the library. Certain facilities requiring access after regular business hours are equipped with card-key access systems to enhance personal safety and building security.

Campus Safety Officers conduct patrols across campus on a 24/7 basis, utilizing vehicles, bicycles, and foot patrols. The campus is well-lit, and Campus Safety regularly checks to ensure that all lighting and safety systems are functioning effectively. The fencing surrounding much of campus serves to enhance both personal safety and property security.

The Facilities Department is responsible for the upkeep of College buildings and grounds with a strong emphasis on safety and security. Campus Safety collaborates closely with Facilities, as officers are trained to identify hazardous conditions during patrols and while responding to reported safety and security concerns.

In the event of emergencies, it may be necessary to adjust or modify any published schedules. Areas identified as problematic undergo security assessments. Campus Safety, Residential Life, and Facilities collaboratively review security survey findings related to landscaping, locks, windows, alarms, lighting, and emergency call boxes to ensure their safe operation.

Access Control and Security Management Systems

Exterior doors equipped with an electronic access control system can be accessed by members of the Trinity community who possess valid credentials. These door locks operate using proximity reader technology. To gain entry, the Trinity ID card must be presented in front of the proximity reader located near the entrance.

ID card production services are available on Level A of the Raether Library and Information Technology Center.

Alcohol Policy

Connecticut General Statutes § 30-89 — Purchase or Possession of Alcoholic Liquor by Persons Under 21

Connecticut law prohibits persons under the age of 21 from purchasing, attempting to purchase, or possessing alcoholic liquor except under circumstances specifically permitted by law.

The statute also prohibits the use of false statements or other prohibited means to obtain alcoholic liquor by a person who is not legally permitted to purchase it. Violations are subject to the penalties established under Connecticut law.

Connecticut General Statutes § 30-89a — Permitting Persons Under 21 to Possess Alcohol in Dwelling Units or on Private Property

Connecticut law prohibits a person who possesses or controls a dwelling unit or private property from knowingly or recklessly permitting a person under the age of 21 to illegally possess alcoholic liquor in the dwelling unit or on the property.

The law also requires a person who possesses or controls such property to make reasonable efforts to stop the illegal possession of alcoholic liquor by a person under the age of 21 when the person knows that such illegal possession is occurring.

A violation of Connecticut General Statutes § 30-89a is a **Class A misdemeanor**.

These provisions are subject to the exceptions and requirements contained in applicable Connecticut law. Members of the Trinity College community are also responsible for complying with College policies governing the possession, consumption, distribution, and service of alcoholic beverages.

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 "Alcohol Use and Alcohol Policy Regulations and Violations."

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 of drugs has become so widespread a danger in society that no college or university can ignore the problem. Because the College is concerned with preventing the serious difficulties that arise for the individual from illegal drug usage and from illegal drug distribution, certain members of the College staff are available to those in need of confidential counseling and medical assistance. The College strongly encourages the use of these services.

There are, however, other aspects to illegal drug usage and distribution, and the College community should be fully informed of the possible consequences. 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. Therefore, the following regulations apply.

Regulations

1. 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 that contain any quantity of a substance that has been designated as subject to federal narcotic 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 functions of the central nervous system and as having a tendency to promote abuse or psychological or physiological dependence, or both. Controlled drugs are classifiable as amphetamine-type, barbiturate-type, cannabis-type, cocaine-type, hallucinogenic, morphine-type, and other stimulant and depressant drugs. Specifically excluded from controlled drugs are alcohol, nicotine, and caffeine. Students are expected to be aware of and to observe the laws concerning “club or designer drugs,” which include, but are not limited to, methylenedioxymethamphetamine (MDMA, also known as “ecstasy” or “X”), ketamine (“Special K”), gamma-hydroxybutyrate (“GHB”), and rohypnol (“roofies”). In addition to any prohibition governed by federal or state law, the College prohibits the following behaviors:

- (a) Any possession, use, sale, distribution, or manufacture of any narcotic, drug, nonprescribed medication, chemical compound, or other controlled substance; any misuse of prescribed medication; any attempt to engage in the aforementioned activities.
- (b) Any possession, use, sale, distribution, or manufacture of drug paraphernalia or any attempt to engage in the aforementioned activities relating to paraphernalia. Such items are subject to confiscation.

2. Although the College wishes to counsel and advise individuals and groups who are having difficulty with drugs, the College may find itself obligated to apprise the appropriate public agencies when it has knowledge of violations because the possession, use, sale, manufacture, prescription, or distribution of illegal drugs is an offense against Connecticut and federal laws.
3. 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 concern of the administration and faculty to help those individuals who wish counseling on drugs. The hope is that we can maintain a healthy campus community, a prospect severely jeopardized by the use of dangerous drugs and by certain activities related to drugs. The welfare of the College requires frank recognition of the risks involved in drug abuse and continued efforts to find effective means to solve this problem.

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
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. Included 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 occurring off campus is under the jurisdiction of the Hartford Police Department (HPD). Campus Safety is responsible for reporting any incidents involving students to the Dean of Community Life and Standards Office. While HPD maintains primary jurisdiction in all off-campus areas, Campus Safety Officers are authorized to respond to student-related incidents that take place in close proximity to the campus. HPD regularly collaborates and communicates with campus safety personnel regarding any significant incidents on campus or in the immediate surrounding neighborhoods and business districts. Campus Safety Officers may also provide assistance in investigations alongside local, state, or federal law enforcement agencies.

Regarding misconduct occurring off campus, students must acknowledge and accept any consequences imposed by civil authorities and should not expect the College to intervene on their behalf. The College will not facilitate bail arrangements or provide legal services for students facing legal challenges but will expect students to manage their own release. However, the Dean

of Community Life and Standards Office retains the authority to take disciplinary action against students and officially recognized student organizations for misconduct that occurs off campus.

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 , 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, robbery, aggravated assault, burglary, motor vehicle theft, arson, larceny-theft, simple assault, intimidation, 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: For Clery Act purposes, sexual assault means an offense that meets the definition of rape, fondling, incest, or statutory rape as used for federal crime reporting.

Rape: 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: Touching of the private body parts of another person for the purpose of sexual gratification, without the consent of the victim, including when the victim is incapable of giving consent because of age or temporary or permanent mental incapacity.

Incest: Sexual intercourse between persons related to each other within the degrees in which marriage is prohibited by law.

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

FBI 2025 NIBRS note: The FBI 2025.0 NIBRS User Manual uses the title “Criminal Sexual Contact” for NIBRS offense 11D. The current federal Clery regulations, however, continue to use “Fondling” as a Clery sex-offense reporting category. Trinity should therefore retain Fondling in the Clery statistical categories while recognizing the newer NIBRS terminology when reviewing source data.

CONNECTICUT GENERAL STATUTES § 53a-65 — DEFINITIONS

Actor: A person accused of sexual assault.

Sexual intercourse: 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.

Sexual contact: Contact with the intimate parts of a person for the purpose of sexual gratification of the actor or for the purpose of degrading or humiliating such person, or contact of the intimate parts of the actor with a person for such purposes. The current statute also addresses certain sexual contact with a dead human body for purposes of § 53a-73a.

Impaired because of mental disability or disease: A condition in which a person suffers from a mental disability or disease that renders the person incapable of appraising the nature of the person’s conduct.

Mentally incapacitated: A condition in which a person is rendered temporarily incapable of appraising or controlling the person's conduct because of a drug or intoxicating substance administered without consent, or because of another act committed upon the person without consent.

Physically helpless: A condition in which a person is unconscious or, for another reason, is physically unable to resist an act of sexual intercourse or sexual contact or to communicate unwillingness to such an act.

Use of force: Use of a dangerous instrument, or actual physical force, violence, or superior physical strength against the victim.

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

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

Psychotherapy: Professional treatment, assessment, or counseling of a mental or emotional illness, symptom, or condition.

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

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

School employee: The statutory term includes specified school personnel and certain other persons who, in performing their duties, have regular contact with students and provide services to or on behalf of students.

2025 report correction: Outdated language limiting "sexual intercourse" or "sexual contact" based on marital status has been removed. The current statute should control if amended.

CONNECTICUT SEXUAL-ASSAULT CRIMES

Connecticut General Statutes § 53a-70 — Sexual Assault in the First Degree: Class B or A Felony

A person commits this offense when, as applicable:

- Compelling another person to engage in sexual intercourse by use of force against that person or a third person, or by a threat of force that reasonably causes fear of physical injury.
- Engaging in sexual intercourse with a person under thirteen years of age when the actor is more than two years older.
- Committing sexual assault in the second degree under § 53a-71 while aided by two or more other persons actually present.
- Engaging in sexual intercourse with a person who is mentally incapacitated to the extent that the person is unable to consent.

Classification: The offense is generally a Class B felony, but specified circumstances involving younger victims make it a Class A felony. Connecticut law also prescribes mandatory sentencing provisions for specified circumstances.

Connecticut General Statutes § 53a-70a — Aggravated Sexual Assault in the First Degree: Class B or A Felony

A person commits this offense when, as applicable:

- Committing sexual assault in the first degree under § 53a-70 and, in the commission of that offense, using or being armed with and threatening the use of a deadly weapon; intentionally causing serious and permanent disfigurement or permanent loss or impairment of a bodily member or organ; recklessly creating a risk of death under circumstances evincing extreme indifference to human life and causing serious physical injury; or being aided by two or more other persons actually present.

Classification: The offense is a Class B felony, or a Class A felony when the victim is under sixteen, with mandatory sentencing provisions specified by statute.

Connecticut General Statutes § 53a-70c — Aggravated Sexual Assault of a Minor: Class A Felony

A person commits this offense when, as applicable:

- Committing a specified sexual offense against a victim under thirteen and an aggravating circumstance applies, including kidnapping or illegal restraint, stalking, causing serious physical injury or disfigurement, multiple victims under thirteen, the victim being unknown to the actor, or a prior violent sexual-assault conviction.

Classification: This offense is a Class A felony and carries substantial mandatory sentencing provisions.

Connecticut General Statutes § 53a-71 — Sexual Assault in the Second Degree: Class C or B Felony

A person commits this offense when, as applicable:

- Engaging in sexual intercourse under one of the circumstances specified by statute, including certain age differentials involving a victim thirteen through fifteen; a victim

impaired because of mental disability or disease; a physically helpless victim; specified guardianship, custody, supervisory, psychotherapist, school-employee, coaching/instruction, or authority relationships; or other circumstances enumerated in § 53a-71.

Classification: The offense is generally a Class C felony; it is a Class B felony when the victim is under sixteen. The statute contains detailed relationship- and age-based elements that should be consulted in the official text.

Connecticut General Statutes § 53a-72a — Sexual Assault in the Third Degree: Class D or C Felony

A person commits this offense when, as applicable:

- Compelling another person to submit to sexual contact by use of force, or by threat of force that reasonably causes fear of physical injury to that person or a third person.
- Engaging in sexual intercourse with a person whom the actor knows to be related within a degree of kindred specified by Connecticut law.

Classification: The offense is generally a Class D felony; it is a Class C felony when the victim is under sixteen.

Connecticut General Statutes § 53a-72b — Sexual Assault in the Third Degree with a Firearm: Class C or B Felony

A person commits this offense when, as applicable:

- Committing sexual assault in the third degree under § 53a-72a and, in the commission of the offense, using or being armed with and threatening the use of or displaying or representing possession of a firearm.

Classification: The offense is generally a Class C felony; it is a Class B felony when the victim is under sixteen. Connecticut law includes mandatory sentencing provisions.

Connecticut General Statutes § 53a-73a — Sexual Assault in the Fourth Degree: Class A Misdemeanor or Class D Felony

A person commits this offense when, as applicable:

- Subjecting another person to sexual contact under circumstances specified by statute, including certain age differences; mental incapacity or impairment; physical helplessness; specified guardianship, custody, supervisory, psychotherapist, school-employee, coaching/instruction, or authority relationships; sexual contact with an animal or dead body; and other circumstances enumerated in § 53a-73a.

Classification: The offense is generally a Class A misdemeanor; it is a Class D felony when the victim is under sixteen.

Statutory-text note: The descriptions above are report-ready summaries of the current Connecticut crimes, not substitutes for the official statutory text. Because several Connecticut sexual-assault provisions contain detailed age, relationship, and sentencing conditions, the official Connecticut General Statutes should control in any legal determination.

Domestic Violence

Federal / Clery definition: A felony or misdemeanor crime of violence committed by a current or former spouse or intimate partner of the victim; by a person with whom the victim shares a child in common; by a person who is cohabitating with, or has cohabitated with, the victim as a spouse or intimate partner; by a person similarly situated to a spouse under applicable domestic or family violence laws; or by another person against an adult or youth victim protected under applicable domestic or family violence laws. An incident meeting the federal definition is considered a crime for Clery Act reporting purposes.

Connecticut family violence: Connecticut law separately defines family violence and family or household members. For the Annual Security Report, the federal Clery definition governs whether an incident is counted as Domestic Violence; Connecticut law is included to explain the state-law framework.

Dating Violence

Federal / Clery definition: Violence committed by a person who is or has been in a social relationship of a romantic or intimate nature with the victim. The existence of the relationship is determined based on the reporting party's statement and consideration of the length and type of relationship and the frequency of interaction. Dating violence includes, but is not limited to, sexual or physical abuse or the threat of such abuse and does not include acts covered by the definition of domestic violence.

Connecticut law: Connecticut's family-violence framework includes persons who are in, or who have recently been in, a dating relationship. For Clery statistical purposes, however, Trinity applies the federal Dating Violence definition above.

Stalking

Federal / Clery definition: Engaging in a course of conduct directed at a specific person that would cause a reasonable person to fear for the person's safety or the safety of others, or suffer substantial emotional distress. A course of conduct means two or more acts, including acts in which the stalker directly, indirectly, or through third parties follows, monitors, observes, surveils, threatens, communicates to or about a person, or interferes with a person's property. "Reasonable person" means a reasonable person under similar circumstances and with similar identities to the victim.

Connecticut stalking offenses: Connecticut separately criminalizes stalking, including stalking in the first and second degrees under the current Penal Code. The state provisions contain their own elements and classifications. For Clery statistical reporting, Trinity applies the federal Clery definition above while also recognizing conduct that may constitute an offense under Connecticut law.

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 offered annual training on the College's Policy on Sexual Harassment and their role as Responsible Employees. In addition, the Office of Title IX provided in-person and online training for student employees serving as Responsible Employees, focusing on recognizing potential policy violations, understanding reporting obligations, connecting students with available resources, and ensuring concerns are promptly shared with the Office of Title IX for appropriate follow-up and support.

First-year students are required to complete and/or attend:

- Sexual Assault Prevention video: a comprehensive overview and education of all forms of sexual misconduct that also includes active bystander instruction.
- A First-Year Orientation program: Hosted by the Office of Student Leadership and Engagement (SLE). The Office of Title IX facilitated an educational training led by the Title IX Coordinator. The session reviewed the Policy on Sexual Harassment, including prohibited conduct, available resources for support, and the resolution processes for reporting and addressing concerns.

Additionally, the Women and Gender Resource Action Center (WGRAC) facilitated a prevention training led by Speak About It, Partying Safer which featured virtual and interactive dialogue on issues of consent, healthy relationships, sexual misconduct and active bystander intervention. WGRAC also introduced key administrators and their confidentiality levels, as well as the Trinity chapter of the Green Dot Violence Prevention Initiative.

First year students are strongly encouraged to attend workshops titled, Consent 101-The Red Zone, presented by WGRAC and Students Expecting Consent (SECS), a student organization of WGRAC.

Green Dot Violence Prevention Initiative:

This prevention initiative is designed to engage the entire campus in bystander prevention and elimination of all types of sexual harassment on campus via safe bystander intervention actions that are proactive and reactive: Green Dots. Faculty, staff and students all learn these steps

through Green Dot Workshops and presentations, activities and social media platforms. The strategy relies on those students with social capital that can influence their peers. These campus members receive intensive training and then role model the Green Dot values and behaviors to their peer groups. Student leaders also receive annual Green Dot training. Please see below – Bystander Intervention and Risk Reduction - for a full explanation of the initiative.

The College also provides ongoing awareness-raising and educational events that are open to all students, faculty, and staff, hosted by WGRAC and SECS. These programs include:

The Red Flag Campaign: <http://www.theredflagcampaign.org>: An annual campaign spearheaded by SECS (Students Expecting Consent), a student organization of WGRAC, to educate all campus members about the warning signs of abusive and unhealthy relationships and stalking and to provide active bystander tools.

The Vagina Monologues: An annual performance of Eve Ensler (V)'s Broadway production, acted and directed by students, covering issues related to sexual misconduct and sexual exploitation. The performance is a fundraiser for the Interval House, a Hartford-based domestic violence agency and shelter. Take Back the Night: An annual event to educate the campus on sexual misconduct and bystander intervention and to support survivors. Guest speakers and/or student survivors present on this topic. 16

Take Back the Night: An annual event to educate the campus on sexual misconduct and bystander intervention and to support survivors. Guest speakers and/or student survivors present on this topic.

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.

The Green Dot Violence Prevention Strategy seeks to change the cultural norms on campus surrounding the incidence of sexual assault and harassment.

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, and everyone can do something to prevent it.

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 possible.
Look for early warning signs of trouble.
Intervening does not necessarily mean confronting.
Ask for help.
Assess for safety. **B**e with others. **C**are 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 a party with people that you don’t know very well.

Written Explanation of Rights, Options, and Resources

The College’s Policy on Sexual Harassment 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 Harassment Including Sexual Assault, Domestic Violence, Dating Violence, Stalking, and Retaliation

Trinity College Policy on Sexual Harassment

I. Introduction

Trinity College prohibits discrimination on the basis of sex or gender in the College's education programs and activities, including in admissions and employment. This Policy has been drafted to comply with Title IX of the Education Amendments of 1972 ("Title IX") and its implementing regulations, including the final Title IX regulations issued by the U.S. Department of Education's Office for Civil Rights in May 2020. This Policy also is drafted to comply with relevant portions of the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act (the "Clery Act"), as amended by relevant provisions of the Violence Against Women Reauthorization Act of 2013 ("VAWA").

II. Policy on Sexual Harassment Statement

Trinity College prohibits sexual harassment, including hostile environment sexual harassment (unwelcome conduct of a sexual nature determined by a reasonable person to be so severe, pervasive, and objectively offensive that it effectively denies a person equal access to education or employment) and quid pro quo sexual harassment. For the purposes of this Policy, the term "sexual harassment" also encompasses sexual assault, domestic violence, dating violence, and stalking. Unlike hostile environment sexual harassment, these other offenses need not be "severe, pervasive, and objectively offensive" to violate this Policy.

The College is committed to maintaining an environment free from discrimination and harassment on the basis of sex or gender and has established procedures for the reporting and prompt, equitable, and impartial resolution of sexual harassment reports and complaints, from the initial response to the final result. This Policy describes the mechanisms for reporting and formally and informally resolving reports of sexual harassment that occur within the College's education programs or activities in the United States, as described below. Trinity College has adopted other policies, including those in the Student Handbook, Faculty Manual and Employee Handbook, that prohibit sex discrimination more broadly, including forms of sexual misconduct that may not fall within this Policy's definition of sexual harassment or that occur outside the United States but still within the College's education programs or activities. The prohibitions in those policies may overlap with those of this Policy. This Policy, however, is Trinity College's official Policy governing sexual harassment. 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, to update important information and to ensure ongoing compliance with applicable laws.

A. Effective Date

This Policy, which is effective September 1, 2026, applies only to reports of sexual harassment brought on or after the effective date of this Policy, regardless of when the conduct reportedly occurred. Where the date of the reported conduct precedes the effective date of this Policy, the definitions of prohibited conduct in existence at the time of the alleged incident(s) will be used. The procedures under this Policy, however, will be used to investigate and resolve reports made on or after the effective date of this Policy, regardless of when the incident(s) occurred.

III. 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, board members, visitors, and independent contractors, as well as those who participate in the College's domestic education programs and activities, whether on or off campus. Vendors and others who conduct business with the College or on College property also are expected to comply with this Policy; complaints against such College affiliates will be handled in accordance with existing contracts and agreements. Any person found responsible for sexual harassment under this Policy is subject to disciplinary action, up to and including dismissal, as well as potential personal legal liability.

This Policy applies to sexual harassment that occurs both in the United States and in an education program or activity of the College. The College's education program or activities include all of the College's operations, including locations, events, or circumstances over which the College exercises substantial control over both the Respondent and the context in which conduct occurs, and any building owned or controlled by a student organization that is officially recognized by the College. This Policy does not draw a line between on-campus, off-campus, or online conduct, provided the conduct occurred in an education program or activity in the United States. Examples include College-sponsored, College-funded, or College-supported study off campus, research, internships, mentorships, summer sessions, conferences, meetings, social events, or other affiliated programs or premises.

Any person, regardless of their affiliation to the College, may make a report of sexual harassment pursuant to this Policy. The formal and informal resolution processes described in this Policy may only be initiated, however, if the Complainant is participating in or attempting to participate in the College's education program or activity at the time of filing a formal complaint.¹ Where a Complainant is not participating in or attempting to participate in the

¹ Please see Section V for Definitions applicable to this Policy.

College's education program or activity, the College shall offer reasonably available Supportive Measures and assist in offering additional reporting options.

The College's ability to respond to a report of sexual harassment under this Policy is based on its disciplinary authority over the Respondent. If the Respondent is not an employee or student, the College's ability to take disciplinary action will be limited and is determined by the context of the reported conduct and the nature of the relationship of the third-party Respondent to the College. The College shall determine the appropriate manner of resolution, which may include referral to local law enforcement or to the home school or employer of the third-party Respondent, and/or restriction from access to campus or College programs or activities.

Additionally, the College does not have jurisdiction to investigate reported incidents involving Respondents who are members of the College community that occurred prior to the Respondent being enrolled at or employed by the College where the incident did not occur on campus or in connection with the College's domestic program, activity, or employment.

The College shall respond promptly and equitably to all reports of sexual harassment and shall provide reasonably available Supportive Measures to Complainants and Respondents, regardless of whether a formal complaint is filed. After making a report, a Complainant may request Supportive Measures only, may request to keep the report confidential, or may choose to file a formal complaint. Alternatively, as described below, the Title IX Coordinator may determine that it is appropriate to file a formal complaint on behalf of the College. After the filing of a formal complaint, the Complainant may decide to seek an informal resolution in lieu of a formal resolution process (investigation and hearing).

The College shall 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 may be found in the "Reporting Protocols and Confidentiality" section of this Policy (Part VII).

In certain cases, the College may exercise its independent authority to investigate (apart from any separate criminal investigation by law enforcement) and address sexual harassment, even in the absence of a formal complaint by the Complainant.

IV. The Title IX Coordinator

The College's Title IX Coordinator may be reached by email at titleixcoordinator@trincoll.edu, by phone at 860-297-2688, or at Mather Hall, Room 208. The Title IX Coordinator is responsible for providing leadership and centralized support to ensure compliance with Title IX, relevant portions of the Clery Act, and other federal and state laws and regulations pertaining to sex discrimination, harassment, and sexual violence. The Title IX Coordinator serves as the primary College resource on Title IX requirements and compliance and provides consultation as needed. The Title IX

Coordinator also is charged with providing education and training, overseeing the reporting and complaint processes, coordinating the College's investigation and resolution of all reports of sexual harassment, and maintaining centralized records of all reports, formal complaints, investigations, and resolutions in accordance with Title IX.

The Title IX Coordinator may designate the Deputy Title IX Coordinator to assist in Title IX compliance. The Deputy Title IX Coordinator has duties and responsibilities similar to the Title IX Coordinator and 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, the Title IX Coordinator may designate the Deputy Title IX Coordinator or another qualified member of the College community to assume the role at issue, as necessary and appropriate.

The Title IX Coordinator also works in partnership with campus administrators referred to as Appropriate College Officials in this Policy. For purposes of this Policy, the term Appropriate College Official refers to the Title IX Coordinator or the Deputy Title IX Coordinator; the Vice President for Students, Community, and Institutional Culture, the Assistant Vice President for Community and Belonging and Compliance, the Associate Vice President for Student Life, and any Dean, Associate Dean, or Assistant Dean in the Office of Student and Community Life; the Provost and Dean of Faculty; the Vice President and Chief Financial Officer, the Assistant Vice President for Human Resources; and the Director of Campus Safety.

V. Definitions

This Policy prohibits a broad range of behaviors, including sexual harassment, sexual assault, dating violence, domestic violence, stalking, and retaliation.

If you have any questions about the definitions 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 the Deputy Title IX Coordinator.

A. Key Terms

1. **Complainant:** The individual reported to have experienced conduct prohibited by this Policy.
2. **Respondent:** The individual reported to have committed conduct prohibited by this Policy.
3. **Party or Parties:** When the Complainant and the Respondent are discussed individually or collectively.
4. **Reporter:** An individual who reports prohibited conduct, but who did not personally experience prohibited conduct.
5. **Confidential Employees:** Employees designated by the College who have a duty to report information to the Office of Title IX but may do so without disclosing personally identifying information of the persons involved. See Section VI.2.A.i. on page 14 for more information.

6. Privileged Employees: Employees designated by law or licensure whose disclosures are protected and are not required to be reported to the Office of Title IX unless there is a threat of harm to self or others. See Section VI.2.A.ii. on page 15 for more information.
7. Responsible Employees: All other College employees that are required to report all known details of incidents under this Policy. See Section VI.2.A.iii. on page 15 for more information.
8. Supportive Measures: Non-disciplinary, non-punitive individualized services offered without fee or charge to preserve access to the College's education programs and activities, such as counseling, schedule changes, and no contact orders. See Section VIII on page 18 for more information.
9. Informal Resolution: A voluntary, informal framework that includes informal or restorative options for resolving reports that may, but typically do not, involve disciplinary action against a Respondent. See Section IX on page 28 for more information.
10. Formal Resolution: A structured process with formal procedures that involve an investigation, adjudication at a live hearing and, if appropriate, the imposition of sanctions. See Section X on page 29 for more information.
11. Sanctions: Outcomes, including disciplinary action, rendered when a Respondent is determined to have violated this Policy. See Section XIII on page 42 for more information on the range of sanctions for students and employees.
12. Appeal: A request by a Party to review and change the outcome of a Formal Resolution which must be based on specific grounds. See Section XIV on page 44 for more information.

B. Prohibited Conduct

1. Title IX Sexual Harassment

The Title IX regulations define "sexual harassment" as conduct on the basis of sex that must satisfy one or more of the following:

- a. Hostile environment sexual harassment: Unwelcome conduct determined by a reasonable person to be so severe, pervasive, and objectionably offensive that it effectively denies a person equal access to an education program or activity;
- b. Quid pro quo sexual harassment: An employee conditioning the provision of an aid, benefit, or service of the College on an individual's participation in unwelcome sexual conduct; and
- c. Sexual assault, dating violence, domestic violence, and stalking, as defined below.

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 may in fact have less or equal power in a relationship also can 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 have 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.

2. Hostile Environment Sexual Harassment

The College considers a variety of factors related to the objective offensiveness, pervasiveness, and severity 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.

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

- a. 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.
- b. Written graffiti or the display or distribution of sexually explicit drawings, pictures, written materials; sexually charged name-calling; or the circulation, display, or creation of emails, text messages, or websites of a sexual nature.
- c. Display, presentation, or circulation of 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. See Faculty Manual, Appendix B1, regarding academic freedom.
- d. Unwelcome physical contact or suggestive body language, such as touching, patting, pinching, hugging, kissing, or brushing against an individual's body.
- e. 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.
- f. Acts of verbal, nonverbal, or physical aggression, intimidation, or hostility based on sex or sex stereotyping.
- g. Sexual exploitation—taking 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 or viewing, recording, or distributing another person's sexual activity, intimate body parts, or the person in a state of undress, without their knowledge and consent.

3. Quid Pro Quo Sexual Harassment

Quid pro quo sexual harassment occurs when an employment opportunity (e.g., hiring, compensation, advancement, etc.) or an educational opportunity (e.g., admission, grades, research, etc.) is conditioned by an employee upon the targeted student or employee submitting to unwelcome requests or demands for sexual favors. Only individuals with authority to grant or withhold employment or educational opportunities can engage in quid pro quo sexual harassment.

In some cases, quid pro quo sexual harassment is obvious and may involve an overt action, threat, or reprisal. In other instances, it is subtle and indirect, with a coercive aspect that is unstated. Examples of behavior that might be considered quid pro quo sexual harassment include, but are not limited to:

- a. Physical coercion or pressure of an individual to engage in sexual activity or punishment for a refusal to respond or comply with sexual advances.
- b. Use of a position of power or authority to: (a) 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 (b) promise rewards in return for sexual favors.

4. Sexual Assault

Sexual assault is having or attempting to have sexual contact with another individual without consent or where the individual cannot consent because of age or temporary or permanent mental incapacity (see below for definition of consent and incapacitation).² Sexual contact includes:

- a. Sexual intercourse (anal, oral, or vaginal), including penetration with a body part (e.g., penis, finger, hand, or tongue) or an object or requiring another to penetrate themselves with a body part or an object, however slight;
- b. Sexual touching of the private body parts, including, but not limited to, contact with the breasts, buttocks, groin, genitals, or other intimate part of an individual's body for the purpose of sexual gratification; or
- c. Attempts to commit sexual assault.

5. Dating and Domestic Violence

Dating and domestic violence means any act of violence against a Complainant who is or has been in a sexual, dating, domestic, or other intimate relationship with the Respondent or against a person with whom the Respondent has sought to have such a relationship, as follows:

a. Dating Violence

² The statutory definition of sexual assault referenced by the Title IX regulations also includes having or attempting to have sexual contact between persons who are related to each other within the degrees where marriage is prohibited by law.

Dating violence includes any act of violence committed by a person:

- i. Who is or has been in a social relationship of a romantic or intimate nature with the Complainant; and
- ii. Where the existence of such a relationship shall be determined based on a consideration of the following factors:
 - The length of the relationship;
 - The type of relationship; and
 - The frequency of interaction between the persons involved in the relationship.

b. Domestic Violence

Domestic violence includes any act of violence committed by a current or former spouse or intimate partner of the Complainant; by a person with whom the Complainant shares a child in common; by a person who is cohabitating with, or has cohabitated with, the Complainant as a spouse or intimate partner; by a person similarly situated to a spouse of the Complainant under Connecticut state law; or by any other person against an adult or minor Complainant who is protected from that person's acts under Connecticut state law.

6. 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 who 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.

7. Retaliation

Retaliation means any adverse action, intimidation, threat, coercion, or discrimination against an individual for the purpose of interfering with any right or privilege secured by Title IX or its regulations or because the individual has made a report or formal complaint of sexual harassment, testified, assisted, or participated or refused to participate in any manner in any investigation, proceeding, or hearing under this Policy.

Retaliation can be committed by any individual or group of individuals, not just a Complainant or Respondent. Retaliation may constitute 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 for reporting, filing, or participating in the investigation or adjudication of a complaint of discrimination or sexual harassment 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.

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.

C. Forms of Sexual Misconduct Prohibited under Other College Policies

Trinity College also prohibits forms of sexual misconduct that, although they do not qualify as “sexual harassment” under this Policy and the Title IX regulations, nonetheless pose similar threats to equal opportunity to employment and education as sexual harassment. Accordingly, such misconduct is prohibited and may be subject to investigation and adjudication under the Student Handbook, Faculty Manual, or Employee Handbook. Although the formal and informal resolution processes set forth in this Policy apply only to sexual harassment as defined by the Title IX regulations (defined above), for ease of reference, selected additional forms of sexual harassment and sexual misconduct prohibited by other College policies are listed below. (See Part XI.5 below for information regarding coordination with Other Policies.)

1. Sexual Harassment

Pursuant to Title VII, Connecticut state law, and the recognition that sexual harassment also may occur in a wider variety of contexts, the College also prohibits a broader form of sexual harassment, as defined in the Employee Handbook. The College, its agents, supervisory employees, staff, and students shall be held liable for their acts of sexual harassment and are subject to appropriate College disciplinary action and personal liability. Sexual harassment, whether opposite or same sex, includes but is not limited to: unwelcome sexual advances, unwelcome requests for sexual favors, or other behavior of a sexual nature, on or off campus, when:

- Submission to such conduct is made a condition, explicit or implicit, of an individual's education or employment; or
- Submission to or rejection of such conduct is used as a factor in or basis for decisions affecting an individual's education or employment; or
- Such conduct has the purpose or effect of unreasonably interfering with an individual's education or employment by creating an intimidating, hostile, or offensive educational, living, or work environment.

While it is not possible to list all the circumstances that may be considered sexual harassment, the following are examples of conduct which, if unwelcome, may constitute sexual harassment: physical, verbal, visual, or written conduct of a sexual nature, including, but not limited to, pressuring someone for dates, retaliation for non-submission to a request for sexual favors, and electronic messages or photos.

2. 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 of taking advantage of that individual's impairment or intoxication.

3. Improper Romantic Relationships

All relationships that occur in a hierarchical relationship present an imbalance of power. By virtue of their position of authority, a supervisor or faculty member has the ability 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. The full policy on Romantic Relationships is available in the College's Employee Handbook.

If an employee feels that such a relationship cannot be avoided, counsel should be sought from an Appropriate College Official (see [Appendix B](#)) to ensure that necessary steps are taken to avoid potential conflict.

D. Related Definitions

1. Affirmative Consent

References to “consent” in this Policy should be construed as meaning “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 they have the affirmative consent of all persons engaged in the sexual activity and that such consent is sustained throughout sexual activity.

Consent may never be given by minors, mentally disabled persons, those who are incapacitated (see below), and those who are by law unable to give consent.

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. Prior 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.

2. Coercion

Coercion is 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 they do not want to engage in sexual activity or do not want to go beyond a certain point of sexual interaction, continued pressure beyond that point may be considered coercive depending on the circumstances.

3. Incapacitation

Incapacitation is the inability, temporarily or permanently, to give consent because the individual is mentally and/or physically impaired, either voluntarily or involuntarily, or the individual is unconscious, asleep, or otherwise unaware that the sexual activity is occurring. In addition, an individual is incapacitated if the individual demonstrates that the individual is unaware at the time of the incident of the fact, nature, or extent of the sexual activity or why or how they became engaged in a sexual interaction.

When alcohol or other drugs are involved, incapacitation is a state of impairment that is so severe that it interferes with a person’s capacity to make informed and knowing decisions. Alcohol and other drugs impact each individual differently, and determining whether an individual is

incapacitated requires an individualized determination. The College does not expect community members to be medical experts in assessing incapacitation. Rather, individuals should look for the common and obvious warning signs that show that a person may be incapacitated or approaching incapacitation. A person's level of intoxication is not always demonstrated by objective signs; however, some signs that a person may be incapacitated include clumsiness, difficulty walking, poor judgment, difficulty concentrating, slurred speech, vomiting, combativeness, or emotional volatility. A person who is incapacitated may not be able to understand some or all of the following questions: "Do you know where you are?" "Do you know how you got here?" "Do you know what is happening?" "Do you know whom you are with?"

An individual's level of intoxication may change over a period of time based on a variety of factors, including the amount of substance intake, speed of intake, body mass, and metabolism. It is especially important, therefore, that anyone engaging in sexual activity is aware of both their own and the other person's level of intoxication and capacity to give consent.

It is important to remember that the use of alcohol or other drugs can lower inhibitions and create an atmosphere of confusion about whether consent is effectively sought and freely given. If there is any doubt as to the level or extent of one's own or the other individual's intoxication or incapacitation, the safest course of action is to forgo or cease any sexual activity. Even where there is insufficient evidence to establish incapacitation, a complainant's level of impairment may still be a relevant factor in establishing whether consent was sought and freely given.

In evaluating consent in cases of reported incapacitation, the College asks two questions: (1) Did the Respondent know that the Complainant was incapacitated? (2) If not, would a sober, reasonable person in a similar set of circumstances as the Respondent have known that the Complainant was incapacitated? If the answer to either of these questions is "yes," there was no consent, and the conduct likely is a violation of this Policy. A Respondent's voluntary intoxication never is an excuse or a defense, and it does not diminish one's responsibility to determine that the other person has given consent.

VI. Reporting Protocols and Confidentiality

A. Understanding the Distinction between Privacy and Confidentiality

Trinity College strongly encourages all individuals who have experienced or witnessed incidents of sexual harassment to share information with the Title IX Coordinator. The Title IX Coordinator shall provide the Complainant with information about resolution options and access to reasonably available Supportive Measures. The Title IX Coordinator also shall consider the Complainant's wishes with respect to Supportive Measures and resolution options and shall seek to honor specific requests when appropriate.

If a Complainant or witness does not wish to report an incident of sexual harassment to the College but wishes to seek support or information in a confidential setting, such support should

be sought from one of the Confidential and Privileged Employees listed below and also listed in [Appendix C](#).

The following information about privacy and confidentiality is intended to differentiate these two terms as they are used in this Policy.

1. Privacy

refers to the discretion that will be exercised by the College, including the Office of Title IX, in the course of any formal or informal resolution process under this Policy. Information related to a report of sexual harassment shall be handled discreetly and shared with a limited circle of College employees or designees who need to know to assist in the assessment, investigation, and resolution of the report and related issues. Individuals in the Office of Title IX, along with investigator(s), Administrative Hearing Panelists, those tasked with facilitating Informal Resolutions, and appellate officials shall receive training in how to safeguard private information. The College shall make reasonable efforts to investigate and address reports of sexual harassment under this Policy, and information may be disclosed to participants in an investigation as necessary to facilitate the thoroughness and integrity of the investigation. In all such proceedings, the College shall maintain the privacy of the parties to the extent reasonably possible. The privacy of student education records will be protected in accordance with the Family Educational Rights and Privacy Act (FERPA). Access to an employee's personnel records also is governed by College policy and by applicable state laws.

2. Confidentiality

refers to statutory protections provided to individuals who disclose information in legally protected or privileged relationships, including professional mental health counselors, medical professionals, attorneys, and ordained clergy (see [Appendix C](#)). When an individual shares information with Confidential and Privileged Employees as a confidential communication in the course of a protected relationship, the Confidential and Privileged Employees shall not disclose the identifying information without the individual's written permission or unless required by ethical or legal obligations that compel the professional to reveal such information. For example, information may be disclosed when the individual gives written consent for its disclosure, there is an imminent threat of physical harm to self or others, or the information concerns conduct involving suspected abuse or neglect of a minor under the age of 18. Similarly, medical and counseling records shall not be released without the individual's written permission or unless permitted or required consistent with ethical or legal obligations.

Confidential and Privileged Employees may share non-personally identifying information about Clery reportable crimes with Campus Safety for purposes of the anonymous and aggregate statistical reporting under the Clery Act.

3. Release of Information by the College

Pursuant to the Clery Act, the College shall disclose statistics about Clery Act crimes in its daily crime log and Annual Security Report and provides those statistics to the U.S. Department of Education. If a report of sexual assault, dating violence, domestic violence, stalking, or another Clery Act crime poses a serious or continuing threat to the campus community, the College shall issue a timely notification to the campus community to protect the health and safety of the campus community as required by the Clery Act. In all of these instances, the information is reported in a manner that does not include personally identifying information about persons involved in an incident.

The College will not release to the general public the name of the Complainant, the Respondent, or witnesses except as otherwise permitted or required by law. The College also shall maintain the confidentiality of any Supportive Measures provided to a Complainant, to the extent that maintaining such confidentiality would not impair the College's ability to provide the Supportive Measures. The College also may share non-personally identifying information about reports received in aggregate form, including data about outcomes and sanctions. All College proceedings are conducted in compliance with the requirements of FERPA, the Clery Act (as amended by VAWA), Title IX, state and local law, and College policy.

4. Mandatory Reporting of Child Abuse and Neglect

In addition to the above reporting responsibilities, all College employees have an obligation to report known or suspected child abuse and neglect consistent with Connecticut state law. Child abuse can be reported to the Connecticut State Department of Children and Families hotline at 1-800-842-2288. After an external report is made, the employee also must report the information to the Title IX Coordinator.

5. Reporting Responsibilities of College Employees

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 designated as Confidential and Privileged Employees, meaning they are able to maintain a higher degree of confidentiality, as described above. All other employees are required to promptly share all relevant details of an alleged incident of sexual harassment with the Title IX Coordinator. The distinctions between these groups are explained below so that individuals can make informed choices about how and where they seek help and guidance.

6. Confidential and Privileged Employees

Confidential and Privileged Employees include any College employee who has the ability to maintain the confidentiality of communications under applicable law or by designation. Confidential and Privileged Employees include medical, clinical, and mental health professionals

and clergy when acting in that professional role in the provision of services, as well as any employee providing administrative, operational, and/or related support for such providers in their performance of such services. Information about Confidential and Privileged Employees is contained in C. When individuals who otherwise are Confidential and Privileged Employees receive information outside of the provision of services, the Confidential and Privileged Employees are required to share that information with the Title IX Coordinator. For example, a licensed counselor who receives a disclosure in the context of speaking at a prevention program would be required to share the information with the Title IX Coordinator.

A Complainant may seek assistance, support, and advice from a Confidential and Privileged Employee without initiating a College investigation that could reveal the identity of the Complainant or the fact that the Complainant has disclosed the incident. The two categories of Confidential and Privileged Employees are Confidential Employees and Privileged Employees.

a. Confidential Employees

Confidential Employees are not required to share identifying information with the Title IX Coordinator under College policy, these employees shall share with the Title IX Coordinator general details, such as the nature, date, time, and general location of the alleged incident, without sharing personally identifying information. Additionally, this category of campus Confidential and Privileged Employees may be required to provide information in response to a search warrant, subpoena, or court order. Confidential Employees are identified in Appendix C, and have the initials “CE”.

b. Privileged Employees

Privileged Employees are confidential by state law and have heightened protections recognized by the courts and law enforcement agencies, as defined in the Confidentiality section above. Privileged Employees are identified in Appendix C, and have the initials “PE”.

An individual who speaks to any of the employees described above must understand that if a Complainant wants to maintain confidentiality, the College may be unable to conduct an investigation of the particular incident or pursue disciplinary action against a Respondent.

However, Confidential and Privileged 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 (Supportive Measures). A Complainant who at first requests confidentiality may later decide to file a formal complaint with the Title IX Coordinator or to make a report to law enforcement and may be assisted by Confidential and Privileged Employees in doing so.

c. All Other Employees – Private Communications

Other than those employees who are designated as Confidential and Privileged Employees, as described above, all College employees, including faculty and staff, Resident Advisors, P.R.I.D.E. Leaders, and Orientation Leaders (while employed during new student orientation week), and all other students employed by the College shall be Responsible Employees and shall report any possible violations of the Policy on Sexual Harassment to the Title IX Coordinator or the Deputy Title IX Coordinator. Student employees must report any possible violations of the Policy on Sexual Harassment if they witness or become aware of an alleged violation while functioning within the scope of their employment with the College.

All College employees who are not designated as Confidential and Privileged Employees are required to report to the Title IX Coordinator all known information about alleged sexual harassment, such as the identities of the parties, any witnesses, and the date, time, and specific location of the alleged incident. The Title IX Coordinator may share reports with other College employees to ensure a coordinated institutional response; examples include College employees or agents who are responsible for processing, investigating, adjudicating, and responding to sexual harassment reports: deans, program directors, supervisors, human resources staff, and Campus Safety or other campus security personnel who are responsible for reporting campus crime statistics and issuing timely warnings under the Clery Act.

i. Exception for Disclosures during Certain Public Awareness Events

Employees are not required to report information disclosed at public awareness events (e.g., “Take Back the Night,” vigils, protests, survivor speak-outs, or other public forums in which students may disclose sexual harassment). The College may provide information about Title IX and available College and community resources and support at public awareness events.

ii. Requests to a College Employee for Confidentiality

In the event that a Complainant discloses an incident of sexual harassment to an employee who is not a Confidential and Privileged Employees and requests confidentiality or requests that the College not take action regarding the report, the employee still is required to report all known information to the Title IX Coordinator; however, the employee also shall include the Complainant and/or Reporter’s request to maintain confidentiality. In such a case, the Title IX Coordinator shall weigh the request for confidentiality against the College’s obligation to provide a safe, nondiscriminatory environment for all College community members, including the Complainant.

VII. Reporting

The College encourages all individuals to report sexual harassment or a potential violation of this Policy to the Title IX Coordinator, to the Campus Safety, and/or to local law enforcement. A

Complainant has the right to report, or decline to report, potential criminal conduct to law enforcement. Upon request, the College shall assist a Complainant in contacting law enforcement at any time. Under limited circumstances (posing a threat to health or safety of any individual or to comply with applicable law), the College may independently notify law enforcement.

An individual may make a report to the College, to law enforcement, to neither, or to both. Campus Title IX processes and law enforcement investigations operate independently of one another, although the Title IX Coordinator may coordinate information with law enforcement as part of the initial assessment.

More information about rights and options for safety, support, and reporting can be found in *Your Rights, Your Options* (available online at: <https://www.trincoll.edu/title-ix/wpcontent/uploads/sites/57/2024/10/YRYO-2025.pdf>). *Your Rights, Your Options* is a booklet that shares the available on- and off-campus resources for support for survivors, accused persons, and secondary survivors; offers guidance for understanding your rights and options; and explains the levels of confidentiality of campus staff, faculty, and certain student staff. Anyone can make a report as follows:

A. Make a Report to the Title IX Coordinator in Person, by Email, or by Telephone

Mather Hall, Room 208
titleixcoordinator@trincoll.edu
860-297-2688

B. Make a Report to Local Law Enforcement Hartford Police Department

253 High Street
Hartford, Connecticut 06103
Emergency Line: 911
Nonemergency Line: 860-757-4000

See Appendix A and *Your Rights, Your Options* for additional information on how to report to local law enforcement.

C. Community Resources for Emergency Medical Assistance

- See Appendix A and *Your Rights, Your Options* for information on emergency resources.
- See Appendix A and *Your Rights, Your Options* for information on where to receive medical care and assistance with evidence preservation.

D. Make an Anonymous Report

A Complainant is not required to reveal their identity to report an incident. However, an anonymous report may limit the College's ability to respond with an investigation or disciplinary action. The College provides an online form, accessible from the Title IX webpage (<http://www.trincoll.edu/title-ix>; click on "Sexual Harassment Reporting Form"), for anonymous reporting to the Title IX Coordinator and Campus Safety officials. Although providing anonymous information may limit the ability of the College to investigate or impose discipline, it can help the College maintain accurate records regarding the number of incidents involving students, employees, and third parties; determine if there is a pattern of conduct with regard to a particular location, group or Respondent; and alert the campus community to potential dangers when appropriate.

E. Time Frame for Reporting

Complainants and witnesses are encouraged to report sexual harassment or potential Policy violations as soon as possible to maximize the College's ability to respond promptly and effectively. The College does not, however, limit the time frame for reporting. Depending on the relationship of the Respondent to the College, the College may not have the authority to impose disciplinary action. Where the College does not have disciplinary authority—i.e., a report is made after a student has left or graduated or an employee no longer works for the College—the College shall still seek to meet its Title IX obligations by evaluating the reported conduct, providing reasonably available Supportive Measures to the Complainant, and assisting the Complainant in identifying external reporting options and may take other appropriate action to address the reported conduct.

F. Amnesty

The College encourages reporting and seeks to remove barriers to reporting by providing amnesty for Complainants and witnesses who report sexual harassment or potential Policy violations occurring at or near the time of the incident. The College recognizes that students who have been drinking and/or using drugs at the time the incident occurs may be hesitant to report such incidents due to fear of potential consequences of their own conduct. In general, 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 good faith report of sexual harassment. The nature and scope of the leniency will depend on the particular circumstances involved. The Title IX Coordinator and/or other Appropriate College Official will have sole discretion in determining the appropriate course of action. (See Trinity College Medical Amnesty and Good Samaritan Policy.)

G. Coordination with Law Enforcement

All Trinity students, faculty members, staff members, and covered third parties have the right to report, or decline to report, potential criminal conduct 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 U.S. 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 shall not, however, wait for the conclusion of a criminal proceeding to begin or conclude its own investigation and resolve complaints under this Policy. The College shall, however, comply with valid requests by law enforcement for cooperation in a criminal investigation. As such, the College shall provide reasonably available and appropriate Supportive Measures to promote the safety and well-being of the Complainant and the school community while law enforcement is gathering evidence.

VIII. Supportive Measures

Upon receipt of a report, Trinity College shall identify and provide reasonably available and appropriate Supportive Measures. A Supportive Measure is a non-disciplinary, non-punitive individualized service offered as appropriate, as reasonably available, and without fee or charge to the Complainant or Respondent at any time before or after a formal complaint is filed or where no formal complaint has been filed. Supportive Measures are designed to preserve access to the College's education programs and activities without unreasonably burdening the other party, including measures designed to protect the safety of the Complainant, the Respondent, or broader College community; maintain the integrity of the investigative and/or resolution process; and deter retaliation. The College shall maintain the confidentiality of any Supportive Measures provided to a Complainant and a Respondent, to the extent that maintaining such confidentiality would not impair the ability of the College to provide the Supportive Measures.

Available Supportive Measures may include, but are not limited to, the following:

1. No contact orders issued by the College, which are measures that restrict encounters and communications between the parties. See XVIII below for more information about no contact orders.
2. Academic support, which are measures that include deadline extensions, incompletes, course changes, late drops, or other arrangements as appropriate.
3. Residential support, which are measures that include arranging for new housing or providing temporary housing options, as appropriate.
4. Transportation or working arrangement changes or other employment support, as appropriate.
5. Access to support services, provided with assistance from 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.
6. Assistance with reporting a crime to local law enforcement, which may be requested at any time by an individual involved in an alleged incident of sexual harassment. 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 also will 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](#).

The availability of Supportive Measures will be determined by the specific circumstances of each report. The College shall consider a number of factors in determining which Supportive Measures to take, including the needs of the student or employee seeking Supportive Measures; the severity or pervasiveness of the alleged conduct; any continuing effects on the parties; whether the Complainant and the Respondent share the same residence hall, academic course(s), or job location(s); and whether court proceedings have been used to protect any parties (e.g., protective orders). The College shall work in good faith to implement the requirements of judicially issued protective orders and similar orders, to the extent that doing so is within its authority.

The Title IX Coordinator is responsible for ensuring the implementation of Supportive Measures and coordinating the College's response with the appropriate offices on campus. The Title IX Coordinator has the discretion to impose and/or modify any Supportive Measure based on all available information and is available to meet with a Complainant or Respondent to address any concerns about the provision of Supportive Measures. The College shall maintain the privacy of any Supportive Measures provided under this Policy to the extent practicable.

The College shall provide reasonable Supportive Measures to third parties as appropriate and available, taking into account the role of the third party and the nature of any contractual relationship with the College.

A. Emergency Removal

Certain circumstances may warrant removing a student Respondent from a College education program or activity. The College may remove a student Respondent on an emergency basis from College property or employment, education or research programs, or activities. The determination of whether to remove a student may be made by the Title IX Coordinator in consultation with other College employees, as necessary. This decision may be made at any point in the process.

Before imposing an emergency removal, the College shall undertake an individualized analysis of safety and risk for the campus community to determine whether the Respondent's presence in the program or activity poses an immediate threat to the physical health or safety of any student or other individual arising from the allegations of sexual harassment justifies a removal. If the College determines such removal is necessary, the Respondent will promptly be provided written notice and an opportunity to challenge the decision immediately following the removal. During any challenge, the Respondent will remain off campus and must comply with the notice of removal. That notice shall include a statement that the use of any information the Respondent chooses to provide may be used subsequently in implementing any aspect of this Policy, including the

investigation and adjudication. The Respondent will have 72 hours to submit a written challenge of the safety and risk analysis to the Title IX Coordinator. The Title IX Coordinator shall assign the matter to be reviewed by a decision maker to evaluate the information in support of the individualized safety and risk analysis and any information provided by the Respondent and the Complainant, as applicable. The decision maker shall submit a final decision in writing to the Respondent and the Complainant within three (3) calendar days, with a copy to Title IX Coordinator.

Any individual who hears the challenge to the removal determination will not be involved in any decision regarding responsibility or appeal of that decision regarding responsibility.

B. Administrative Leave

The College retains the authority to place an employee Respondent on administrative leave during the investigation and adjudication process, consistent with the procedures set forth in the Employee Handbook and the Faculty Manual.

IX. Overview of the College's Resolution Processes

The College is committed to providing a prompt, thorough, equitable, and impartial resolution of all reported violations of this Policy. To implement this Policy, the College has developed a formal and an informal resolution process to resolve reports of sexual harassment:

- **Informal Resolution:** an informal framework that includes informal or restorative options for resolving reports that may, but typically do not, involve disciplinary action against a Respondent.
- **Formal Resolution:** formal procedures that involve an investigation, adjudication and, if appropriate, the imposition of sanctions.

In all formal and informal resolution processes, the College shall treat Complainants and Respondents equitably by offering Supportive Measures to a Complainant when the College has notice of potential sexual harassment and by following either the formal or informal resolution process before the imposition of any disciplinary sanction against a Respondent. Upon receipt of a report, the College shall conduct an initial assessment of the available information and consider the Complainant's stated interests, as well as the College's compliance obligations, in determining how to proceed. A Complainant always is entitled to reasonably available Supportive Measures, regardless of whether a formal or informal resolution process is initiated.

A. Time Frame for Resolution

The College shall seek to complete the appropriate resolution process as promptly as possible, consistent with the need to conduct sensitive and informed fact gathering to ensure an equitable resolution. The Policy designates reasonably prompt time frames for the major stages of the

investigation and resolution process (typically set forth in calendar days), but the College may extend any time frame in this Policy for good cause and/or due to extenuating circumstances. An extension may be required for good cause to ensure the integrity and thoroughness of the investigation; to comply with a request by law enforcement; in response to the unavailability of the parties or witnesses; or for other legitimate reasons, such as intervening breaks in the College calendar, exam periods, the complexity of the investigation, the volume of information, number of witnesses, length of the written record, and/or the severity and extent of the alleged misconduct. While requests for delays by the parties may be considered, the College shall not unduly or unreasonably delay the prompt resolution of a report under this Policy. Reasonable requests for delays by the parties may serve to extend the time period for resolution of the report.

The Title IX Coordinator, in consultation with the investigator(s), has the authority to determine whether an extension is required or warranted by the circumstances. The College shall notify the parties in writing of any extension of the time frames for good cause, the reason for the extension, and the length of the extension. Although cooperation with law enforcement may require the College to delay temporarily an investigation under this Policy while law enforcement investigates, the College promptly shall resume its Title IX investigation once law enforcement has completed gathering evidence.

Investigations shall proceed according to the time frames in this Policy to the extent possible during the summer and at other times when classes at the College are not in session. The Title IX Coordinator shall work with the parties to balance the need for promptness and the preference for in-person meetings regarding the investigation.

Time frames for all phases of the disciplinary process, including the investigation, any related disciplinary proceedings, and any related review of the finding, apply equally to both the Complainant and the Respondent.

B. Advisor

Throughout the informal or formal resolution process, each party has the right to be accompanied at any meeting or hearing by an advisor of their choice. The advisor may be any person, including an attorney. A party may decline to use an advisor for any or all stages of the formal or informal resolution process, with the exception of the hearing, where any questioning of the other party must be conducted by the party's advisor. If a party does not have an advisor for the hearing, the College shall provide an advisor, free of charge, who may be, but is not required to be, an attorney, to attend the hearing and conduct questioning on behalf of that party.

The advisor may observe, provide support, and provide guidance or advice to the party (in a nondisruptive manner). With the exception of the advisor's live questioning during the hearing, the advisor may not speak on behalf of the parties or otherwise participate in, or in any manner delay, disrupt, or interfere with meetings and/or proceedings. An advisor should plan to make themselves reasonably available; the College shall not unduly delay the scheduling of meetings or

proceedings based on an advisor's unavailability. An advisor may be asked to meet with a College administrator in advance of any proceedings to understand the expectations of the role, privacy considerations, and appropriate decorum. An advisor may be removed for failure to follow these expectations. The advisor is entitled to review all information gathered in the investigation that is directly related to the allegations (as part of evidence review), to access to the investigation report, and to cross-examine the other party and all witnesses during the hearing.

C. Obligation to Provide Truthful Information

All College community members are expected to provide truthful information in any proceeding under this Policy. Intentionally false accusations will not be tolerated. Submitting or providing false or misleading information in bad faith or with a view to personal gain or intentional harm to another in connection with an incident of sexual harassment is prohibited and subject to disciplinary sanctions, in accordance with the Student Handbook, Faculty Manual, and Employee Handbook, as applicable. 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.

X. Intake and Initial Assessment

A. Response to a Report

Any person may report sexual harassment or retaliation to the Title IX Coordinator or Campus Safety or may utilize the other reporting options cited above. A report may be made verbally or in writing. Upon receipt of a report, the Title IX Coordinator shall contact the Complainant to discuss the availability of Supportive Measures with or without the filing of a formal complaint, shall explain to the Complainant the process for filing a formal complaint, and shall consider the Complainant's wishes with respect to Supportive Measures.

During the initial assessment, a Complainant may request Supportive Measures only or may file a formal complaint. Alternatively, as described below, the Title IX Coordinator may determine that it is appropriate to file a formal complaint on behalf of a Complainant. After the filing of a formal complaint, the Complainant may decide to seek informal resolution in lieu of a formal resolution process (investigation, hearing, and appeal). A Complainant is always entitled to reasonably available Supportive Measures, regardless of whether a formal or informal resolution process is initiated.

The Title IX Coordinator also shall determine whether the Policy applies to the report and whether the reported conduct falls within the jurisdiction and scope of the Policy and/or Title IX.

B. Overview of Initial Assessment

As part of the initial assessment, the Title IX Coordinator shall:

- Promptly contact the Complainant to discuss the availability of Supportive Measures.
- Consider the Complainant's wishes with respect to Supportive Measures.
- Assess the nature and circumstances of the report, including whether it provides the names and/or any other information that identifies the Complainant, the Respondent, any witness, and/or any other individual with knowledge of the reported incident.
- Address immediate physical safety and emotional well-being needs.
- Conduct an individualized analysis of safety and risk for the campus community to determine whether a student Respondent's presence in the College's education programs or activities poses an immediate threat to the physical health or safety of any student or other individual that justifies removal.
- Notify the Complainant of the right to contact (or decline to contact) law enforcement or seek a civil protection order.
- Notify the Complainant of the right to seek medical treatment.
- Notify the Complainant of the importance of preservation of evidence.
- Refer the report to the Campus Safety Department to assess the reported conduct for any Clery Act obligations, including entry in the daily crime log or issuance of a timely warning.
- Provide the Complainant with written information about on- and off-campus resources.
- Provide the Complainant with a copy of this Policy and an explanation of the procedural options, including seeking Supportive Measures, the process for filing a formal complaint, the formal resolution process, and informal resolution.
- Notify the Complainant of the right to be accompanied at any meeting or proceeding by an advisor of their choice, and that the College shall provide an advisor, without fee or charge, to conduct questioning on behalf of that party at the hearing if they do not have an advisor.
- Assess the available information for any pattern of conduct by Respondent.
- Discuss the Complainant's expressed preference for manner of resolution and any barriers to proceeding (e.g., confidentiality concerns).
- Explain the College's Policy prohibiting retaliation and how to report acts of retaliation.
- Determine the age of the Complainant, and if the Complainant is a minor, make the appropriate report of suspected abuse consistent with Connecticut state law.

The initial assessment will be conducted promptly and the time frame for the initial assessment will be tailored to the context and circumstances. The College shall seek to complete the initial assessment within ten (10) calendar days but recognizes that there may be circumstances in which the initial assessment takes longer based on the availability of the Complainant or other necessary information, a Complainant's request to maintain privacy or not seek disciplinary action or other factors outside of the College's control. The College understands that a Complainant may engage in delayed decision-making, which may impact the timing of the conclusion of the initial assessment.

C. Filing a Formal Complaint

The formal resolution process (investigation, hearing, and appeal) and informal resolution process are initiated by the filing of a formal complaint. A formal complaint is a written document alleging sexual harassment, within a domestic education program or activity of the College by a Respondent over whom the College has jurisdiction and requesting initiation of the College's investigation and adjudication process. A formal complaint may be submitted to the Title IX Coordinator.

1. Mandatory Dismissal of a Formal Complaint

The Title IX Coordinator shall determine whether the conduct alleged in the formal complaint falls within the scope of the Policy and the definitions of sexual harassment. The Title IX regulations require the College to dismiss some or all of the allegations in the formal complaint related to sexual harassment if: 1) the conduct alleged, even if substantiated, would not constitute sexual harassment as defined in the Title IX regulations; 2) the conduct did not occur within College's education program or activity; or, 3) the conduct did not occur in the United States.

This means that the College may be required by law to dismiss some or all of the allegations in the formal complaint under Title IX and provide the parties notice of the dismissal and the opportunity to appeal that dismissal.

Stated another way, the procedures described in this Policy shall apply only when all of the following elements are met, in the reasonable determination of the Title IX Coordinator or the Deputy Title IX Coordinator:

- a. The conduct is alleged to have occurred on or after March 15, 2021;
- b. The conduct is alleged to have occurred in the United States;
- c. The conduct is alleged to have occurred within the College's education program or activity;
and
- d. The alleged conduct, if true, would constitute sexual harassment as defined in this Policy.

While formal complaints falling outside of the Title IX regulations will be dismissed for Title IX purposes, where such conduct otherwise constitutes prohibited conduct and falls within the scope of either the Student Handbook, Faculty Manual or Employee Handbook, it still will be addressed and shall proceed to either the formal or informal resolution process described in those other policies.

2. Discretionary Dismissal of a Formal Complaint

The Title IX Coordinator or the Deputy Title IX Coordinator may dismiss a formal complaint brought under this Policy or any specific allegations raised within that formal complaint at any time during the investigation or hearing if:

- a. A Complainant notifies the Title IX Coordinator or the Deputy Title IX Coordinator in writing that the Complainant wishes to withdraw the formal complaint or any allegations raised in the formal complaint;

- b. The Respondent is no longer enrolled or employed by the College; or,
- c. If specific circumstances prevent the College from gathering evidence sufficient to reach a determination regarding the formal complaint or allegations within the formal complaint.

3. Notice of Dismissal of a Formal Complaint and How to Appeal the Dismissal

The decision about whether to dismiss a formal complaint, in whole or in part, may be made at any time in the process. Upon reaching a decision that the formal complaint will be dismissed, the Title IX Coordinator shall promptly notify the Complainant and the Respondent of the dismissal of the formal complaint or any specific allegation within the formal complaint and the reason for the dismissal, simultaneously, in writing. If some or all of the allegations in the formal complaint have been dismissed, the parties may appeal this dismissal using the procedure outlined in the “Appeals” section below.

4. Consolidation of Formal Complaints

The College may consolidate formal complaints against more than one Respondent, or by more than one Complainant against one or more Respondents, or by one party against the other party, where the allegations of sexual harassment arise out of the same facts or circumstances. All parties shall receive simultaneous, timely notification of any such consolidation. During the course of the investigation, the investigation may reveal the existence of additional or different potential Policy violations, which also may be consolidated following notification to the parties of the amended notice of investigation.

5. Coordination with Other Policies

Where conduct involves the potential violation of both this Policy and another College Policy arising from the same or similar set of facts and circumstances, the College has the discretion to investigate and resolve the conduct under the investigation and adjudication procedures set forth in this Policy, provided that doing so does not unduly delay a prompt and equitable resolution of the report and that the parties are provided timely notice of a decision to consolidate the cases and an opportunity to respond. In such cases, the decision maker may adjudicate and sanction misconduct that falls outside the purview of this Policy, even if the sexual harassment claim is not substantiated.

Complaints that are finally resolved pursuant to the formal or informal resolution processes set forth in this Policy may not be pursued under other College policies, if the complaint is based on the same transactions and occurrences addressed under this Policy. However, cases that are dismissed pursuant to the mandatory or discretionary dismissal processes described above, prior to any formal investigation or adjudication, may be pursued under other applicable College policies.

6. Balancing Complainant Autonomy with the College’s Responsibility to Investigate

The College endeavors to respect the wishes of a Complainant to not pursue a formal complaint. If a Complainant requests that their name or other personally identifiable information not be shared with a Respondent or that no formal complaint be pursued, the College shall balance this request against its commitment to a safe, nondiscriminatory learning, living, and working environment for all community members, including for the Complainant. In particular, the Title IX Coordinator shall consider the Complainant's articulated concerns, the safety of the campus community, fairness to all individuals involved, and the College's obligations under Title IX.

In these instances, before taking any further investigative steps, the Title IX Coordinator shall discuss any concerns with the Complainant and shall seek to address and remedy barriers to reporting based upon concerns about retaliation or questions about procedural options and potential outcomes.

In evaluating the appropriate manner of resolution, including whether the Title IX Coordinator shall file a formal complaint in the absence of a formal complaint by the Complainant, 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:

- The totality of the known circumstances;
- The risk that the Respondent may commit additional acts of sexual or other harassment, which will be informed by additional factors, such as:
 - Whether there have been other sexual harassment complaints involving the Respondent;
 - Whether the Respondent has a known history of arrests or records indicating a history of violence;
 - Any threats of further sexual harassment or other violence against the Complainant or others; and
 - Whether multiple Respondents were involved in the reported incident;
- The nature and scope of the alleged conduct, including whether the reported behavior involved the use of a weapon;
- The respective ages and roles of the Complainant and Respondent, including whether the Complainant was a minor at the time of the incident;
- Whether the College possesses other means to obtain relevant evidence of the reported conduct (e.g., security cameras, information known to College personnel, or physical evidence);
- The Complainant's interest in the College not pursuing a formal complaint and the impact of such actions on the Complainant;
- Whether the report of sexual harassment reveals a pattern of misconduct at a given location or by a particular group (e.g., intoxication induced by illicit drugs or alcohol);
- Fairness considerations for both the Complainant and the Respondent;
- The College's obligation to provide a safe and nondiscriminatory environment; and

- Any other available and relevant information.

The College shall not compel a Complainant to participate in an investigation or disciplinary proceeding.

Where the balance of factors requires the Title IX Coordinator to file a formal complaint on behalf of the Complainant, the Title IX Coordinator shall inform the Complainant in writing about the chosen course of action.

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

7. Determination after the Initial Assessment: Scope and Manner of Resolution

The Title IX Coordinator shall consider the nature of the report, the safety of the individual and the campus community, and the Complainant's expressed preference for the manner of resolution in determining the appropriate course of action to achieve the goals of Title IX and the Policy. The range of available resolution options include:

No Further Action	Supportive Measures Only	Formal Resolution	Informal Resolution
This option may involve referral to another College policy or grievance procedure, such as the Student Handbook, Employee Handbook, or Faculty Manual.	These measures shall be available regardless of whether a formal complaint is filed.	This option is available only after a formal complaint by a Complainant or the Title IX Coordinator.	This option is available only after a formal complaint by a Complainant or the Title IX Coordinator.

At the conclusion of the initial assessment, the Complainant shall receive a written notice of the determination about how the College shall proceed.

XI. Informal Resolution Process

The College may resolve reports through informal resolution as appropriate based on the circumstances.

Informal resolution is available only once a formal complaint has been filed, prior to a determination of responsibility, and where the Complainant, Respondent, and the College voluntarily consent to the process in writing. Informal resolution is not available in cases in which an employee is alleged to have sexually harassed a student.

Before initiating an informal process, the College shall provide the parties a written notice of the process and obtain the parties' voluntary, written request for and consent to the informal resolution process. The written notice to the parties shall disclose:

- The allegations and potential Policy violations at issue;
- The requirements of the informal resolution process (described below);
- The consequences resulting from participating in the informal resolution process, including the records that will be maintained or could be shared;
- The circumstances under which the parties are precluded from resuming a formal complaint arising from the same allegations; and
- The parties' right to withdraw from the informal resolution process and resume the formal resolution process with respect to the formal complaint, at any time prior to agreeing to a resolution.

Upon initiation of the informal resolution process, the Title IX Coordinator shall appoint an individual to facilitate an informal resolution. The appointed facilitator may be the Title IX Coordinator, the Deputy Title IX Coordinator, or a trained third party. The facilitator shall meet with both parties to discuss the options for informal resolution.

When sexual harassment allegations have been resolved through informal resolution by mutual consent of the parties and on a basis that is acceptable to the appointed facilitator in consultation with the Title IX Coordinator or the Deputy Title IX Coordinator, the resolution process shall be considered finally decided and there will be no subsequent process or appeal.

The Title IX Coordinator shall maintain records of all reports and conduct referred for informal resolution, which typically will be completed within sixty (60) business days of the initial report.

XII. Formal Resolution Process: Investigation

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 formal complaint of sexual harassment involving a Trinity employee (staff or faculty) or student to initiate the following investigation and adjudication process.

The College shall conduct a prompt and equitable investigation to gather information relevant to the determination of whether there is sufficient information, by a preponderance of the evidence, to determine that a Policy violation occurred. The investigation will be impartial and will be conducted by trained investigator(s) who have no actual bias or conflict of interest for or against the Complainant or Respondent.

During the investigation and disciplinary proceedings, both the Complainant and Respondent have equitable opportunities, including the opportunity to receive a written notice of investigation; to participate in the investigation; to review and present information and evidence; to be accompanied by an advisor of their choice to any meeting; to timely and equal access to information that will be used in disciplinary proceedings; to timely notice of meetings at which their presence will be requested or required; to simultaneous written notice of the outcome, sanction, and rationale; and to appeal the outcome.

The investigator(s), not the parties, are responsible for gathering relevant evidence. The Complainant and Respondent will be asked to identify witnesses and provide other relevant information, such as documents, communications, and other evidence, if available. The parties are encouraged to provide all relevant information as promptly as possible to facilitate prompt resolution and are encouraged to preserve relevant evidence. In the event that a party declines to voluntarily provide material information, the College's ability to conduct a prompt, thorough, and equitable investigation may be adversely impacted.

a. Initiating an Investigation

If the Title IX Coordinator or the Deputy Title IX Coordinator determines that an investigation and adjudication should proceed under this Policy, the Title IX Coordinator or the Deputy Title IX Coordinator shall assign one or more investigators to conduct a prompt, thorough, fair, and impartial investigation. At the discretion of the Title IX Coordinator or the 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 other individual 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.

Students shall play no role as investigators or panelists in the investigation and adjudication process. Any investigator used by the College shall receive annual training on issues related to sexual and gender-based harassment, sexual assault, dating violence, domestic violence, and stalking; the definition of sexual harassment in the Title IX regulations; the scope of the College's education program and activity; how to conduct an investigation that is fair and impartial, providing the parties with notice and a meaningful opportunity to be heard and protecting the safety of all participants while promoting accountability; how to create an investigative report that fairly summarizes relevant evidence; and, how to serve impartially, including by avoiding prejudgment of the facts at issue, conflicts of interest, and bias.

The investigator(s) will be impartial and free from actual bias or conflict of interest for or against the Complainant or Respondent. If either party believes an assigned investigator has a conflict of interest or bias, they must notify the Title IX Coordinator 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 Title IX Coordinator shall 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.

b. Notice of Allegations

The Title IX Coordinator or the Deputy Title IX Coordinator shall provide the Notice of Allegations to the Complainant and Respondent. Such notice shall occur as soon as practicable after the College receives a formal complaint of the allegations, if there are no extenuating circumstances.

The parties typically will be notified by their institutional email accounts if they are a student or employee and by other reasonable means if they are neither. The College shall provide sufficient time for the parties to review the Notice of Allegations and to prepare a response before any initial interview.

c. Notice Contents

The Notice of Allegations shall include the following:

- Notice of the College's investigation and adjudication process and a hyperlink to a copy of this Policy;
- Notice of the allegations potentially constituting sexual harassment and sufficient details known at the time the notice is issued, such as the identities of the parties involved in the incident, if known, including the Complainant; the conduct allegedly constituting sexual harassment; and the date and location of the alleged incident, if known;
- A statement that the Respondent is presumed not responsible for the alleged conduct and that a determination regarding responsibility is made at the conclusion of the investigation and adjudication process;
- The name(s) of the investigator(s), including how to challenge participation by the investigator(s) on the basis of a conflict of interest or bias within three (3) calendar days;
- Information about the parties' participation options in the process;
- The prohibition against retaliation;
- A list of available Supportive Measures;
- A statement that the parties may have an advisor of their choice, who may be, but is not required to be, an attorney;
- The importance of preserving any potentially relevant evidence in any format;

- A statement that before the conclusion of the investigation, the parties may inspect and review evidence obtained as part of the investigation that is directly related to the allegations raised in the formal complaint, including the evidence upon which the College does not intend to rely in reaching a determination regarding responsibility, and evidence that both tends to prove or disprove the allegations, whether obtained from a party or other source; and
- A statement that the College prohibits knowingly making false statements or knowingly submitting false information during a College-authorized investigation.

d. The Duty to Provide Ongoing Notice

If the investigation reveals the existence of additional or different potential violations of this Policy, the Title IX Coordinator shall issue a supplemental written notice of investigation. The parties will be provided sufficient time to review the additional allegations to prepare a response before any initial interview regarding the additional charges.

e. Acceptance of Responsibility

At any point during the investigation, the Respondent may elect to accept responsibility for some or all of the Policy violations at issue. Where there is an acceptance of responsibility as to some but not all of the charges, the investigation shall continue to conclusion, and any acceptance of responsibility will be documented in the investigation report. Where there is an acceptance of responsibility as to all of the potential Policy violations, the investigator(s) shall complete an investigation report of all information gathered to date and, after consultation with the Title IX Coordinator, shall refer the matter for sanctioning, as described below. Where both parties agree, the matter also may be resolved through the Informal Resolution process.

f. Investigative Steps

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

During an investigation, the investigator(s) shall seek to meet separately with the Complainant, Respondent, and relevant witnesses. Although the parties to the investigation may provide information and evidence, it is the investigator's responsibility to gather any evidence directly related to the allegations in the formal complaint to the extent reasonably available, such as information in the possession, custody, or control of the College (e.g., College security access records, employee or student information, etc.). The investigator(s) shall send written notice of the interview date, time, and location, name of participants and purpose of the interview to the parties and witnesses, in sufficient time for the party to prepare and participate.

The investigator(s) shall interview the parties and any witnesses likely to have information directly related to the formal complaint. The investigator(s) also shall gather other related information or evidence, including documents, photographs, communications between the parties, medical records (subject to the consent of the applicable person), and other electronic records as appropriate.

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 shall exercise reasonable discretion in deciding which questions, if any, should be excluded.

At the conclusion of the investigation, the Complainant and the Respondent shall have the opportunity to review and respond to all information gathered in the investigation that is directly related to the allegations, including information shared by the Complainant or the Respondent during their interviews or through evidence either provides.

g. Witnesses

The investigator(s) 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 the Deputy Title IX Coordinator.

Both the Complainant and Respondent have the option to provide names of potential witnesses to the investigator(s). Witnesses are individuals who may have information relevant to the incident, including individuals who may have observed the acts in question, may be able to provide contextual information, or may have other information related to the incident, the disclosure, the parties, or related matters. Witnesses also may be offered to provide subject matter expert information (See Other Evidence: Site Visits and Experts below).

In the event that witnesses are interviewed as part of the investigation, the name of the witness and the information gathered in the interviews will be included in the written investigation report, which the parties shall have the opportunity to review at the conclusion of the investigation. Witnesses may be asked to participate in the hearing in response to the information gathered by the investigator(s).

h. Additional Evidence

Both the Complainant and the Respondent are permitted to provide other relevant evidence to the investigator(s). Evidence includes any facts or information presented in support of an assertion and may include text messages, email exchanges, timelines, receipts, photographs, etc. Any documentation shared by the Complainant or the Respondent with the investigator(s) will be

provided to the other party. The investigator(s) also may consider additional documents, items, or other relevant information.

During the course of the investigation, the parties should bring any new or evolving evidence, such as harassing or retaliatory conduct, to the attention of the investigator(s). The investigator(s) may consider such information in the investigation and also shall share any information about retaliation or violation of the terms of a Supportive Measure with the Title IX Coordinator for further action.

i. Relevance

The College shall not restrict the ability of either party to gather and present relevant evidence. Evidence is relevant if it makes a material fact more or less probable than it would be without the evidence. In general, the investigator(s) have the discretion to determine the relevance and probative value of information proffered or received. At the live hearing, as further described below, the Hearing Convener has the discretion to determine whether questions posed by the party's advisor are relevant, and only relevant questions may be asked of parties or witnesses at the hearing.

In addition, the investigator(s) and Administrative Hearing Panel will be guided by the following evidentiary considerations:

- **Prior or Subsequent Conduct of the Respondent:** In gathering information, the investigator also may consider other reports of, or findings of responsibility for, similar conduct by the Respondent to the extent such information is relevant and available. Such information may be relevant to prove motive, intent, absence of mistake, pattern, or another material fact. For example, where there is evidence of a pattern or conduct similar in nature by the Respondent, either prior to or subsequent to the conduct in question, regardless of whether there has been a finding of responsibility, this information may be relevant and probative to the determination of responsibility and/or assigning of a sanction. Similarly, prior or subsequent conduct of a Complainant, even when it involves conduct that may violate College Policy, may be considered when relevant. The investigator(s) shall determine the relevance of this information, and both parties will be informed if evidence of prior or subsequent conduct is deemed relevant.
- **Prior Sexual History of the Complainant:** Questions and evidence about the Complainant's sexual predisposition or prior sexual behavior are not relevant unless such questions and evidence about the Complainant's prior sexual behavior are:
 - a. Offered to prove that someone other than the Respondent committed the conduct alleged by the Complainant; or,
 - b. The questions and evidence concern specific incidents of the Complainant's prior sexual behavior with respect to the Respondent and are offered to prove consent.

However, previous relationships or prior consent cannot imply consent to future sexual acts. The investigator(s), in consultation with the Title IX Coordinator, shall assess whether information related to prior sexual history makes a material fact in the investigation more or less likely. Where a sufficient informational foundation exists for the inclusion of prior sexual history, the investigator(s) shall provide notice to both parties of the scope of any inclusion of such information in the investigation report. The parties shall have a full and fair opportunity to respond to the information included in the investigation report.

j. Social Media and Personal Communications

The investigator(s) also may consider information publicly available from online sources that comes to the attention of the investigator(s). The College does not actively monitor online sources, however, and as with all potentially relevant information, the Complainant, Respondent, or witness should bring online information to the attention of the investigator(s) if they believe it is relevant. The investigator(s) also may consider communications involving or relating to one or both parties that either party brings to the attention of the investigator(s) or that is provided by the parties in response to a request by the investigator(s). The investigator(s) also may seek a review of information available on College devices or servers, consistent with the College's technology policies.

k. Other Evidence: Site Visits and Experts

The investigator(s) may visit relevant sites or locations and record observations through written, photographic, or other means. In some cases, the investigator(s) may consult with relevant experts when deemed appropriate and necessary by the College. If the investigator(s) or the Administrative Hearing Panel determines that expert witness testimony is necessary, then the College would secure attendance and be responsible for costs. If either party wishes to provide expert testimony or evidence, they are solely responsible for securing attendance of any expert witness at a hearing and for the costs or fees associated with any expert report or testimony.

l. Medical and Counseling Records and Other Privileged Information

The investigator(s) shall not require, allow, rely upon, or otherwise use questions or evidence that constitute, or seek disclosure of, information protected under a legally recognized privilege unless the person holding such privilege has waived the privilege. There is no requirement that a Complainant or Respondent share privileged or confidential medical and counseling records. If a person voluntarily chooses to share medical or counseling records with the investigator(s), they must sign a written consent that acknowledges that relevant information from the medical or counseling records must be shared with the other party to ensure the other party has notice of that information and an opportunity to respond.

m. Expectations of the Parties

The College expects all members of the College community to cooperate fully with the investigation and disciplinary procedures. It is understood that there may be circumstances in which a Complainant or Respondent wishes to limit their participation, and the College shall respect the choice of the Complainant or Respondent as to how to engage in proceedings under this Policy. The College may, however, move forward with formal resolution without the participation of a party or parties.

The College shall not draw any adverse inference solely from a Complainant's or Respondent's decision not to participate in the investigation or any form of resolution under this Policy; however, the Complainant or Respondent should be aware that declining to participate in the investigation may impact the timing and outcome of the case.

In the event that a Respondent who has been notified of an investigation or adjudication fails to cooperate with the investigator(s), the investigation or adjudication may proceed, findings reached, and if appropriate, a sanction imposed based solely on the other information available.

n. Effect of Withdrawal from the College

At any time, the College may place an administrative hold on the Respondent's College transcript or defer or withhold the award of the Respondent's degree. Even if a Respondent withdraws from the College, the Title IX Coordinator may proceed with further action as necessary to eliminate, prevent, or address any impacts of the reported conduct.

o. Safeguarding the Privacy of Complainants and Respondents

As stated above, the College shall not restrict the ability of either party to gather and present relevant evidence. Individuals involved in investigations or disciplinary proceedings under this Policy are encouraged to exercise discretion in sharing information to safeguard the integrity of the process and to avoid the appearance of retaliation.

While discretion regarding the process is important, Complainants and Respondents are not restricted from discussing and sharing information with others who may support or assist them during the process. All parties, however, are encouraged to maintain the privacy of Family Educational Rights and Privacy Act (FERPA)-protected and/or sensitive information gathered or learned in the process.

p. Timing of Investigation

The investigator(s) shall provide periodic updates to the parties about the status of the investigation, with a goal to complete the fact-gathering portion of the investigation within approximately fifty (50) business days.

At the conclusion of the fact-gathering process and prior to the completion of the investigation report, the investigator shall make information gathered in the investigation available for review by the parties and their advisors. The parties shall have an equal opportunity to inspect and review any evidence obtained as part of the investigation that is directly related to the allegations raised in a formal complaint, including the evidence upon which the College does not intend to rely in reaching a determination regarding responsibility and inculpatory or exculpatory evidence, whether obtained from a party or other source, so that each party can meaningfully respond to the evidence prior to conclusion of the investigation. The investigator shall send to each party and the party's advisor, if any, the evidence subject to inspection and review in an electronic format or a hard copy, and the parties shall have ten (10) calendar days to submit a written response, which the investigator shall consider prior to completion of the investigative report. In the written submission, the parties may offer additional comment or feedback on the facts as gathered, clarify information previously shared, suggest additional witnesses, or identify any other relevant information or evidence to assure the thoroughness, sufficiency, and reliability of the investigation.

Written responses to the evidence shall be included in the information shared with the parties and decision makers.

XIII. The Investigation Report

Based on the written responses to the evidence review, the investigator(s), in coordination with the Title IX Coordinator or the Deputy Title IX Coordinator, shall determine whether further investigation is required. In either case, the investigator shall produce an investigation report. The Title IX Coordinator or the Deputy Title IX Coordinator shall share the report with the Complainant and Respondent, simultaneously, in writing.

The investigation report will be sent to each party and their advisor in an electronic format or a hard copy for their review and written response. Both parties may submit a written response to the investigation report to the Title IX Coordinator or the Deputy Title IX Coordinator within ten (10) calendar days of receiving the investigation report. The Title IX Coordinator or the Deputy Title IX Coordinator may extend this deadline for good cause, in which case, both Complainant and Respondent will be afforded the same duration of time in which to submit a written response.

If a party disagrees with the investigator's determinations about relevance, the party can make that argument in the party's written response to the investigation report and to the Administrative Hearing Panel at any hearing held.

Written responses to the investigation report shall be included in the information shared with the parties and decision makers.

A. Special Situations in the Investigative Process

The College retains the right to determine, in its sole discretion, if it shall 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 or the Deputy 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.

XIV. Formal Resolution Process: Hearing and Appeal

a. Selection of the Administrative Hearing Panel

Upon submission of the investigation report to the parties, the Title IX Coordinator or the Deputy Title IX Coordinator shall select an Administrative Hearing Panel and charge that panel to (a) review the investigation report and the responses of the parties to that report, (b) convene and conduct an impartial hearing with live examination of witnesses, (c) determine whether the information is sufficient, by a preponderance of the evidence standard, to establish that the Respondent violated College Policy, and (d) in cases where the Respondent is found responsible, deliberate and impose an appropriate sanction.

The Administrative Hearing Panel shall have three members, two of whom must be College employees. The employee members of the panel will be drawn from a pool of College employees who have received specialized training, as described below. Whenever possible, in cases in which the Respondent is an employee of the College, at least one member of the panel will be from the same job classification (i.e., staff or faculty) as the Respondent. The pool shall not include the Provost and Dean of Faculty, the Vice President and Chief Financial Officer, nor the Vice President for Students, Community, and Institutional Culture, who must remain available for appeals, nor shall the President of the College serve on an Administrative Hearing Panel.

The third member of the panel shall serve as the chair and Hearing Convener. The Hearing Convener need not be a member of the College community.

All members of the Administrative Hearing Panel will be free from conflicts of interest and bias for or against either party and shall receive annual training on issues related to sexual and gender-based harassment, sexual assault, dating violence, domestic violence, and stalking; the scope of the College's education program or activity; how to conduct a hearing and adjudicate in a manner

that is fair and impartial by avoiding prejudgment of the facts at issue; technology that will be used at a live hearing; and issues of relevance of questions and evidence. Training materials are posted on the College's Office of Title IX web page. If either party believes a member of the Administrative Hearing Panel has a conflict of interest or bias, they may notify the Title IX Coordinator, who shall determine if a designee should be appointed.

b. Notice of Hearing

The Title IX Coordinator or the Deputy Title IX Coordinator shall notify the Complainant and the Respondent simultaneously in writing of the date, time, location, and factual allegations concerning the violation(s); the provisions of the Policy alleged to have been violations; the proposed membership of the Administrative Hearing Panel; how to challenge participation of the any member of the Administrative Hearing Panel on the basis of conflict of interest or bias; the right to have an advisor present at the hearing and conduct questioning on the party's behalf; that the College shall provide an advisor, without fee or charge, to conduct questioning on behalf of the party at the hearing if the party does not have an advisor present for the hearing; how to request that witnesses be present at the hearing; information about the hearing format; and the sanctions that may be imposed.

The Respondent and Complainant will be provided the Notice of Hearing at least ten (10) calendar days prior to the date of the hearing. The time frame in which the hearing is conducted may be extended for good cause at the discretion of the Title IX Coordinator or the Deputy Title IX Coordinator. Hearings may be scheduled whenever the College is officially open (including summer and winter breaks).

The Complainant and Respondent shall have three (3) calendar days to request that a proposed panel member be recused for cause, conflict of interest, or bias. The Title IX Coordinator or the Deputy Title IX Coordinator, after considering the party's stated reasons for recusal, shall determine whether the proposed member should be recused and replaced with someone else. Anyone proposed as a replacement panel member will be subject to the same vetting process and time frame set forth above in this paragraph.

Upon expiration of the deadlines for the Complainant and Respondent to respond to make any potential objections to the proposed members of the panel, the Title IX Coordinator or the Deputy Title IX Coordinator shall share the investigation report and the written responses of the Complainant and Respondent to that report and any evidence shared with the parties for their review as part of evidence review with the Administrative Hearing Panel.

c. Impact and Mitigation Statements

Upon receiving the Notice of Hearing, and until three (3) calendar days prior to the commencement of the Administrative Hearing, both parties may submit Impact and Mitigation Statements to the Title IX Coordinator or the Deputy Title IX Coordinator. These statements

present the parties with the opportunity to share any information they would like the Administrative Hearing Panel to consider when assigning a sanction. The Title IX Coordinator or the Deputy Title IX Coordinator shall disclose Impact and Mitigation Statements to the Hearing Panel only in cases in which the Respondent is found responsible and only after the Hearing Panel already has reached its decision regarding the Respondent's liability.

d. The Hearing

As promptly as possible, but no earlier than ten (10) calendar days after the Notice of Hearing is issued, the Administrative Hearing Panel shall hold a hearing for the presentation of live testimony and examination of relevant witnesses. Throughout the hearing, the Respondent is presumed not responsible.

The live hearing may be conducted with all parties physically present in the same geographic location, or, at the College's discretion, any or all parties, witnesses, and other participants may appear at the live hearing virtually through electronic video conferencing. This technology shall enable participants simultaneously to see and hear one another and all participants. At its discretion, the College may delay or adjourn a hearing based on technological errors not within the College's or a party's control. All proceedings will be recorded through audio and a transcript will be made available to the parties upon request.

The hearing is an opportunity for the parties to address the Administrative Hearing Panel. The parties may address any information in the investigation report and supplemental statements submitted in response to the investigation report. The College shall make all evidence directly related to the allegations, as shared in the evidence review, available to the parties at the hearing, including for the purposes of cross examination.

The Administrative Hearing Panel has the discretion to determine the format for the hearing and its deliberations. Typically, the Complainant and Respondent shall have an opportunity to provide an opening statement to the Administrative Hearing Panel. Each party shall then have an opportunity to address the Administrative Hearing Panel and respond to questions by the Administrative Hearing Panel, and/or as described below, the other party's advisor. The Administrative Hearing Panel also shall hear from relevant witnesses, including the investigator(s). Each party shall have the opportunity to question the other party, the witnesses, and the investigator(s) through their advisor of choice, or hearing advisor provided by the College, directly, orally, and in real time. If a party does not have an advisor present at the live hearing, the College shall provide an advisor, free of charge, who may be, but is not required to be, an attorney, for questioning on behalf of that party.

Only relevant questions may be asked of a party or witness. Before a Complainant, Respondent, or witness responds to a question, the Hearing Convener first shall determine whether the question is relevant and briefly explain any decision to exclude a question as not relevant as

defined above. The Administrative Hearing Panel may not draw any inference from the decision of a party or witness not to participate at the hearing.

After all parties and witnesses have been heard, the parties shall have an opportunity to provide a closing statement. The advisor may not provide the opening or closing statement and may not provide answers or responses on behalf of a party. The advisor's role during the hearing is to conduct questioning of the other party and any witnesses. A party may never conduct questioning of the other party themselves.

Following the conclusion of the hearing, the Administrative Hearing Panel shall resolve all outstanding questions of fact, including the credibility of witnesses and the adequacy of the proof of the allegations, and shall render a decision. In determining the outcome of the case, the Administrative Hearing Panel shall apply the "preponderance of the evidence" standard, i.e., whether it is more likely than not that the allegations of the complaint are proven, and if so, whether the conduct violated this Policy. The burden of proving that this standard was met rests with the College, not the parties to the case. The Administrative Hearing Panel shall notify the Title IX Coordinator or the Deputy Title IX Coordinator of its decision.

After being informed of the decision of the Administrative Hearing Panel, and only in cases in which the Respondent is found responsible, the Title IX Coordinator or the Deputy Title IX Coordinator shall disclose the Impact and Mitigation Statements, if any, to the Hearing Panel.

e. Assigning a Sanction(s)

Following receipt of the parties' impact statements, the Administrative Hearing Panel shall reconvene to assign a sanction. In addition to the parties' impact statements, the Title IX Coordinator or the Deputy Title IX Coordinator also shall provide the panel with a summary of the judicial/disciplinary history (date, charge, and disciplinary action) of the respondent, if applicable, along with any available sanctioning precedents in similar cases. The Administrative Hearing Panel shall consider all of the documents and information provided to determine an appropriate sanction. The Title IX Coordinator or the Deputy Title IX Coordinator shall notify the Complainant and the Respondent of the decision of the Administrative Hearing Panel and any sanction imposed, simultaneously, in writing, no later than ten (10) calendar days following the decision.

The Policy prohibits a broad range of conduct, all of which is serious in nature. In keeping with the College's commitment to foster an environment that is safe, inclusive, and free from discrimination and harassment, the Administrative Hearing Panel has great latitude in the imposition of sanctions tailored to the facts and circumstances of each report, the impact of the conduct on the Complainant and surrounding community, and accountability for the Respondent. Sanctions should support the College's educational mission and federal obligations.

In determining the appropriate sanction(s) and/or remedies, the Administrative Hearing Panel shall consider a number of factors, including:

- The nature of the conduct at issue;
- The impact of the conduct on the Complainant;
- The impact or implications of the conduct on the College community;
- Prior misconduct by the Respondent, including the Respondent's relevant prior discipline history, both at the College or elsewhere, and any criminal convictions, if such information is available and known;
- Any expression of remorse or acceptance of responsibility by the Respondent;
- Maintenance of a safe and respectful environment conducive to learning;
- Protection of the College community;
- The necessity of any specific action to eliminate the harassment, prevent its recurrence, and remedy its effects on the Complainant or other College community members; and,
- Any mitigating, aggravating, or compelling circumstances to reach a just and appropriate resolution in each case.

Sanctions may be issued individually, or a combination of sanctions may be imposed. Sanctions typically will be imposed immediately, although the Title IX Coordinator in consultation with the Vice President for Students, Community, and Institutional Culture (if a student), the Provost and Dean of Faculty (if a faculty member), or the Vice President and Chief Financial Officer (if a staff member) has the discretion to stay imposition of some or all sanctions pending an appeal. See Part XVI below for the range of possible sanctions.

f. The Written Outcome Letter

The Administrative Hearing Panel shall prepare a written outcome letter, including the finding of responsibility or non-responsibility, and, if applicable, the sanction and rationale. To the extent permitted by law, the Complainant and Respondent will be informed simultaneously, in writing, no later than ten (10) calendar days following the conclusion of the disciplinary hearing.

The written outcome letter shall include:

- Identification of the allegations potentially constituting a Policy violation;
- A description of the procedural steps taken from the receipt of the formal complaint through the determination, including any notifications to the parties, interviews with parties and witnesses, site visits, methods used to gather other evidence, and hearings held;
- Findings of fact supporting the determination;
- Conclusions regarding the application of the Policy to the facts;
- A statement of, and rationale for, the result as to each alleged Policy violation, including a determination regarding responsibility, any disciplinary sanctions, and whether remedies designed to restore or preserve equal access to the College's education program or activity will be provided to the Complainant; and
- The procedures and permissible bases for the Complainant and Respondent to appeal.

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.

XV. Range of Sanctions

a. 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); 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 also may include other action as deemed appropriate under the circumstances 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 most likely shall receive a sanction of suspension or expulsion.

b. 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.

c. Faculty

Pursuant to the guidelines in the Faculty Manual, disciplinary action for faculty employees may include the following actions, to the extent such actions are consistent with current state and federal law:

- **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 the Faculty member's duties, or this action may be coupled with admonition, censure or suspension.
- **Admonition:** This penalty 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.
- **Censure:** This penalty 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 copy of the letter of admonition will be placed in the Respondent's personnel file.

- **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 penalty. Notice of this penalty will be placed in the Respondent's personnel file. (This penalty must be referred to the Academic Freedom Committee for hearing in accordance with the procedures for dismissal of a tenured Faculty member or a Faculty member before the end of the Faculty member's appointment [Faculty Manual Appendix B.9]. This penalty can be imposed only by the Board of Trustees following the recommendation of the AFC. The AFC does not redetermine the findings of the case, but it does determine whether the suggested penalty should be recommended to the Board.)
- **Dismissal:** This penalty is a permanent separation from the College. Notice of this penalty will be placed in the Respondent's personnel file. (This penalty must be referred to the Academic Freedom Committee for hearing in accordance with the procedures for dismissal of a tenured Faculty member or a Faculty member before the end of the Faculty member's appointment [Faculty Manual Appendix B.9]. This penalty can be imposed only by the Board of Trustees following the recommendation of the AFC. The AFC does not redetermine the findings of the case, but it does determine whether the suggested penalty should be recommended to the Board.)

XVI. Appeals

The Complainant and Respondent may appeal the outcome, subject to the limitations set forth below. The Title IX Coordinator or the Deputy Title IX Coordinator shall provide written notification to the Complainant and the Respondent of any applicable appeal procedures at the time the Complainant and Respondent receive the Administrative Hearing Panel's written outcome letter. The purpose of an appeal is to allow the College to review and correct material errors in the adjudication process, if any.

a. Grounds for Appeal

A Complainant or Respondent may appeal the decision of the Administrative Hearing Panel on one or more of the following grounds:

- Discovery of new evidence, which was not reasonably available at the time of the determination regarding responsibility or dismissal was made, that could materially affect the original outcome. Omission of factual information that was known and available to the appealing party is not a valid ground for an appeal;
- Procedural irregularity that materially affected the outcome of the matter;
- Abuse of discretion in the issuance of a sanction, meaning the Administrative Hearing Panel imposed a sanction that was significantly disproportionate to the offense; or
- The Title IX Coordinator, investigator(s), and/or any member of the Administrative Hearing Panel had a conflict of interest or bias for or against Complainants or Respondents generally or the individual Complainant or Respondent that affected the outcome of the matter.

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

b. Appeal Procedures

An appeal must be made in writing and signed by the party filing the appeal. An appeal in which the Respondent is a faculty employee must be directed to the Provost and Dean of Faculty; an appeal in which the Respondent is a student must be directed to the Vice President for Students, Community, and Institutional Culture; and an appeal in which the Respondent is a staff employee must be directed to the Vice President and Chief Financial Officer. 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 or bias.

Appeals must be made within five (5) calendar days of receipt of the written outcome letter and must include the grounds for appeal and an outline of any supporting evidence. Appeals transmitted via email shall be considered to be “in writing” for the purposes of this section.

When a party appeals either the determination of the Administrative Hearing Panel or the dismissal of a formal complaint, the Title IX Coordinator or the Deputy Title IX Coordinator shall do the following:

- Notify the other party in writing when an appeal is filed;
- Ensure that the appellate official is not the investigator(s) or a member of the Administrative Hearing Panel, ensure that this individual is trained appropriately, and provide the name of the appellate official to the parties, including how to challenge the participation by the appellate official on the basis of a conflict of interest or bias within three (3) calendar days; and
- Allow both parties five (5) calendar days to submit a written statement in regard to the appeal. Written statements shall be included in the information shared with the parties and decision maker(s).

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 the Deputy Title IX Coordinator with instructions for further investigation, if applicable, and consideration by the same or a different Administrative Hearing Panel; the decision about the composition of the panel remains at the sole discretion of the appellate official; or

- Return the case to the Title IX Coordinator or the Deputy Title IX Coordinator with instructions to appoint a different Administrative Hearing Panel to review the case.

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

XVII. No Contact Orders

No contact orders are issued to prohibit individuals from visiting, calling, or sending messages to each other, whether physically, electronically, directly, or through third parties. No contact orders are not disciplinary actions and do not become part of an individual's conduct record.

However, failure to abide by a no contact order may result in disciplinary action and could result in disciplinary sanctions and a conduct record. Alleged violations of no contact orders involving students will be investigated and adjudicated by the Office of Student and Community Life. For employees, the Office of Human Resources shall investigate and resolve alleged violations.

The Title IX Coordinator or the Deputy Title IX Coordinator has authority to issue no contact orders in cases involving allegations of sexual harassment. In so doing, the Title IX Coordinator or the Deputy Title IX Coordinator shall consider all known facts and circumstances that may be relevant to whether a no contact order should be issued, including, but not limited to:

- Whether there are allegations, threats, or evidence of physical violence, emotional abuse, or intimidation that suggest a danger to either party or to the community;
- The respective living arrangements of the parties;
- Whether the parties share classes, workspaces, or offices;
- How to fairly manage any shared extracurricular activities; and
- How to address issues resulting from overlapping social circles or professional obligations.

The Title IX Coordinator may put a no contact order in place even if students do not request one if circumstances warrant it.

No contact orders typically remain in place until the Title IX Coordinator or the Deputy Title IX Coordinator deems it no longer necessary. Prior to dismissing a no contact order, the Title IX Coordinator or the Deputy Title IX Coordinator shall make reasonable attempts to consult with all parties involved. However, the Title IX Coordinator shall have the discretion to dismiss a no contact order where at least one party is no longer affiliated with the College. No contact orders that are long-standing will be reviewed at the beginning of fall and spring semesters with each party. A party may request additional review as needed (e.g., summer, J-term, or other schedules).

The purpose of the review is to assess compliance and effectiveness, and to determine if any changes need to be made.

XVIII. 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. Incoming students and new employees receive primary prevention and awareness programming, and returning students and current employees receive ongoing training and related programs. 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.

XIX. Training, Documentation, and Record Retention Policies

Individuals facilitating informal resolutions and/or conducting investigations and adjudications under this Policy shall receive training annually on the issues related to sexual harassment, sexual assault, domestic violence, dating violence, stalking, and related retaliation; how to conduct a prompt, fair, and impartial investigation and/or adjudication process that protects the safety of Complainants and promotes accountability; and any other specific training required by the Clery Act and Title IX.³

Further, the Title IX Coordinator, the Deputy Title IX Coordinator, and Campus Safety will be educated in awareness and prevention of sexual assault, stalking, and intimate partner violence and shall have an understanding of trauma-informed investigation models.

The College shall maintain the following records for a period of seven years: records of any actions, including any Supportive Measures, taken in response to a report or formal complaint of sexual harassment; records of investigations, including any determination regarding responsibility and any audio recording(s) or transcript(s) created, any disciplinary sanctions imposed on the Respondent, and any remedies provided to the Complainant; any appeal and the result of that appeal; and any Informal Resolution and the result of such resolution processes. These records will be maintained in accordance with the privacy protections set forth in Title IX, Title VII, the Clery Act, FERPA, and applicable state law regarding the privacy of personnel records.⁴

³ As required by the Title IX regulations, training required of—and received by—College officials or external professionals involved in responding to reports of sexual harassment is published online.

⁴ Created for the purpose of investigations under this Policy that are transcribed are not considered to be maintained under this section.

Appendix A – Available Resources and Services

Immediate Assistance

An individual who has been subject to an incident of alleged sexual harassment, has observed an incident, or is otherwise involved should seek immediate assistance as provided in Your Rights, Your Options (available online at: <https://www.trincoll.edu/title-ix/wpcontent/uploads/sites/57/2024/10/YRYO-2025.pdf>) and as summarized below.

Hartford Police Department: Emergency, call 911 Nonemergency, call 860-757-4000

The Complainant also may 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 a 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 harassment to the Title IX Coordinator. The AOC may assist the Complainant sexual harassment with contacting confidential campus resources.
- The College’s immediate response to a report of sexual harassment may include consideration of the Complainant’s request for confidentiality, in accordance with this Policy, as well as the implementation of any safety or supportive measures deemed necessary.

Employee Assistance Program for faculty and staff:

- www.HigherEdEAP.com or 800-225-2527

Medical Care and Evidence Preservation

Any individual who may be experiencing or has experienced sexual harassment, 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 harassment should refrain from changing clothes,

showering, or otherwise changing their physical state after an incident until after consulting with medical personnel. The individual also should 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 Complainant 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 shall 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, Hartford: 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 shall 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 860-225-4681, ext. 211.

Ongoing Assistance

A Complainant or Respondent 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

Lauren Diana
titleixcoordinator@trncoll.edu
860-297-2688

Title IX Advisory Board

To align with Connecticut General Statutes § 10a-55n, the Title IX Advisory Board will be restructured to serve as the institution's Campus Resource Team (CRT), a multidisciplinary

group that supports a coordinated and victim-centered response to sexual assault, stalking, and intimate partner violence. The CRT shall include representatives from key campus offices and constituencies, as well as community partners, as required by state law.

The Board serves as an advisory and collaborative body that supports the work of the Office of Title IX by:

- Providing strategic guidance on policies, procedures, and institutional practices.
- Serving as informed ambassadors who help strengthen awareness and understanding across the campus community.
- Sharing feedback, concerns, and emerging trends to ensure the institution remains responsive to community needs.
- Identifying opportunities to strengthen prevention, education, and response efforts through innovation and problem-solving.
- Contributing diverse perspectives that help inform decision-making and support a comprehensive, community-centered approach.

Consistent with state requirements, membership may include representatives from administration, student affairs, counseling, health services, campus safety, faculty, staff, students, residential life, hearing boards, and other campus stakeholders, along with community partners such as sexual assault crisis centers, domestic violence agencies, and criminal justice professionals.

The Board typically meets once per semester, with additional opportunities for engagement based on institutional needs, member interest, and availability. Members are expected to participate actively and contribute to the institution's efforts to foster a safe, equitable, and supportive campus environment.

Appendix B – Appropriate College Officials

- Lauren Diana, Title IX Coordinator
- Anita Davis, Vice President for Students, Community, and Institutional Culture
- Pamela Whitley, Assistant Vice President for Community and Belonging and Compliance
- Kate Durante, Assistant Vice President for Human Resources
- Maria del Carmen Flores, Associate Vice President for Student Life
- Robert Lukaskiewicz, Assistant Vice President for Students and Institutional Culture
- Ann Reuman, Senior Associate Dean and Special Assistant to the Vice President for Students, Community, and Institutional Culture
- John Selders, Associate Dean, Director of Community Standards and Restorative Justice
- Sonia Cardenas, Provost and Dean of Faculty
- Sarah Raskin, Associate Dean for Faculty Development
- Scott Jordan, Vice President and Chief Financial Officer
- Gavin Viano, Director, Athletics
- Kristen Noone, Assistant Director, Athletics
- John Tollis, Director of Campus Safety

Appendix C–Confidential and Privileged Employees

Confidential Employees

- The Health Center (CE), Wheaton Hall, 860-297-2018 Kara Anastasiou, MSN, ANP, BC, APRN, Clinical Lead and Lead Contact Tracer and Health Center Staff, with the exception of front desk staff
- Women & Gender Resource Action Center (WGRAC) (CE), Mather Hall, second floor. Laura Lockwood, Director: 860-297-2408
- Office of Multicultural Affairs (OMA) (CE), Hamlin Hall, second floor. Jared Delane, Director of Multicultural Affairs: 860-297-4251
- Queer Resource Center (QRC) (CE), 114 Crescent Street. Crystal Nieves, Director of LGBTQ+ Life: 860-297-2582

Privileged Employees

- Spiritual and Religious Life (PE): 860-297-2013
 - The Reverend Marcus George Halley, College Chaplain and Dean of Spiritual and Religious Life
 - Imam Osman Simsek, Director of Muslim Life

- Rabbi Bonnie Margulis, Director of Hillel and Jewish Life
- Counseling and Wellness Center (PE), 135 Allen Place, 860-297-2415
(After business hours: An available counselor's phone number may be obtained by calling the office number.)
 - Haben Maria Abraham, LCSW, Director, and all licensed clinicians

Other Resources

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

Sex Offender Registry

In accordance with applicable federal and Connecticut law, information concerning registered sex offenders is available to members of the public through the Connecticut Department of Emergency Services and Public Protection (DESPP) Sex Offender Registry. Connecticut law requires individuals subject to sex-offender registration requirements to notify the Sex Offender Registry Unit when they are employed at, carry on a vocation at, or are a student at an institution of higher education in Connecticut and to report changes in that status as required by law.

Members of the Trinity College community may obtain information concerning registered sex offenders through the Connecticut Sex Offender Registry maintained by DESPP.

Trinity College Hazing Policy

Hazing, in all forms, is expressly prohibited by the College. Trinity, in compliance with Connecticut state law (Sec. 53-23a.), defines “hazing” as any action that recklessly or intentionally endangers the health or safety of a person for the purpose of initiation, for admission into or affiliation with, or as a condition for continued membership in a student organization (including Greek-letter organizations, athletic teams, club sports, SGA groups, a cappella groups, etc.).

1. The term “hazing” shall include, but not be limited to:
 - a. Requiring indecent exposure of the body;
 - b. Requiring any activity that would subject the person to extreme mental stress, such as sleep deprivation or extended isolation from social contact;
 - c. Confinement of the person to unreasonably small, unventilated, unsanitary, or unlighted areas;
 - d. Any assault upon the person; or
 - e. Requiring the ingestion of any substance or any other physical activity that could adversely affect the health or safety of the individual. The term shall not include an action sponsored by an institution of higher education that requires any athletic practice, conditioning, or competition or curricular activity.
2. “Student organization” means a fraternity, sorority, or any other organization organized or operating at an institution of higher education.
 - a. No student organization or member of a student organization shall engage in hazing any member or person pledged to be a member of the organization. The implied or express consent of the victim shall not be a defense in any action brought under this section.
 - b. A student organization that violates subsection (a) of this section (1) shall be subject to a fine of not more than \$1,500, and (2) shall forfeit for a period of not less than one year all of the rights and privileges of being an organization organized or operating at an institution of higher education.
 - c. A member of a student organization who violates subsection (a) of this section shall be subject to a fine of not more than \$1,000.
 - d. This section shall not in any manner limit or exclude prosecution or punishment for any crime or any civil remedy.

Trinity policies also prohibit the following activities and situations, including, but not limited to:

- Participation in or creation of situations that cause physical harm or emotional strain, such as causing a member or nonmember to be the object of malicious amusement or ridicule.

- Forced, required, or implicitly coerced participation in physical activities such as calisthenics, exercises, or games.
- Participation in activities that involve illegal acts such as kidnapping or stealing or acts that violate College policy.
- Creation of excessive fatigue or distress through deprivation of privacy, sufficient sleep, or decent and edible meals.
- Use of physical brutality or force (including paddling or striking with fists, open hands, or objects).
- Forced, required, condoned, or implicitly coerced behavior resulting in lewdness or potential ridicule or bodily harm (such as forced nudity or partial nudity, including coercing an individual to dress in a degrading manner as part of initiation or affiliation).
- Forced, required, or implicitly coerced consumption of any food, liquor, drug, or any other substance.
- Permitted consumption of excessive amounts of alcohol.
- Any other activities that are not consistent with the regulations and policies of the College.
- For Greek-letter organizations, any activity outside of the approved 21-day new member education period.

Any person who believes they have been hazed or any person who has witnessed or who possesses information on activities that may violate the College's prohibition on hazing should report the incident(s) to the Office of Student and Community Life or call Campus Safety at 860-297-2222.

Hazing Education

- In-person Anti-Hazing Education and Title IX Training for Greek Life students immediately following recruitment in September annually.
- Online Anti-Hazing Education and Dissemination Agreement Training
 - Required annually for all members of Potential New Members of Greek Life, Members of Greek Life, Athletic Team Captains, Residential Life Leaders, and Orientation Leaders.
 - Information regarding training is disseminated through email to all students.
 - The training tracks involvement in the following areas of the students who complete it.
 - Athletics
 - Greek Life Organization.
 - Residential Life Student Leaders
 - Student Organization Leadership
 - Orientation Leaders
- Expanding it this year to include the following,

- All Student Organization Presidents and Finance Officers
- Information on how to report Hazing
 - Information can be found online here
 - <https://www.trincoll.edu/greek-life/parents/>
 - <https://trincoll-studenthandbook-25-26.catalog.prod.coursedog.com/college-policies>
 - <https://www.trincoll.edu/dean-of-students/community-standards/make-a-referral-or-report-a-concern/>
 - Information included in the in-person training and online training can be found after my signature.

Reporting Hazing

How to Report Hazing Information from Anti Hazing Training Education and Dissemination Agreement Form

Hazing Incident

A hazing incident may be reported to Trinity College by anyone: a person who was directly affected by the activity; a person who was involved in the incident; staff, parents, friends, or community members; or anyone who is generally concerned about a student or group. If you have witnessed or have knowledge of a possible hazing incident, please report the incident immediately. Our ability to investigate hazing incidents depends on the accuracy and specificity of the information you provide. You are encouraged to provide as much detail as possible so that appropriate action can be taken to address the behavior.

If you believe you have been hazed or have witnessed hazing, please report the incident to:

Student Leadership & Engagement

Director of Student Leadership & Engagement and Greek Life
Email: michael.bodnarik@trincoll.edu

Office of Student and Community Life

<https://www.trincoll.edu/dean-of-students/meet-the-deans/>

Refer a Student Or Report A Concern

<https://www.trincoll.edu/dean-of-students/community-standards/make-a-referral-or-report-a-concern/>

Campus Safety

<https://www.trincoll.edu/campus-safety/>
Phone Number: 860-297-2222

Silent Whistle Website (Anonymous Reporting)

<https://trincoll.alertline.com/gcs/welcome>

Hazing Report Hotline

Phone Number: 866-934-4567

Additionally you can also email anyone in the Office of Student and Community Life, Campus Safety, and Student Leadership and Engagement to report and for assistance. These offices will work to support you and connect you to resources as well as other offices.

Resources

The following are links to helpful additional information and resources.

- Hazing Prevention Network - <https://hazingpreventionnetwork.org/hazing-facts/>
- Stop Hazing - <https://stophazing.org/resources/>
- Gordie Center - <https://gordie.studenthealth.virginia.edu/learn/hazing-education>
- Cornell University - <https://hazing.cornell.edu/prevention/hazing-prevention-model>
- University of Texas Hazing Prevention Video
- <https://www.youtube.com/watch?v=ZkPonxwBf-Q>

Further Training

If you would like further training and support in addition to the above resources, please contact the Student Leadership and Engagement. SLE will work with you to provide in person training for your group and help you address any issues within your group.

For the 2025 Calendar Year there was one reported incident of Hazing at Trinity College.

Timely Warning Policy

In accordance with the Jeanne Clery Campus Safety Act, Trinity College will issue a Timely Warning when a Clery-reportable crime is reported to a Campus Security Authority or local law enforcement, occurs within the College's Clery geography, and is determined to represent a serious or continuing threat to students, employees, or members of the campus community.

The determination to issue a Timely Warning will be made on a case-by-case basis after consideration of the facts and circumstances surrounding the reported incident, including the nature of the crime, whether a serious or continuing threat exists, and the potential risk to the campus community.

Timely Warnings are intended to provide information that will assist members of the Trinity College community in protecting themselves and preventing similar crimes. Depending upon the circumstances, warnings may be distributed through TrinALERT, College email, text messaging, website notifications, bulletins, or other appropriate communication methods.

Timely Warnings may include, when known and appropriate, information regarding the nature of the crime, the general location and date or time of the incident, a description of a suspect when appropriate, and recommended safety or crime-prevention measures. Trinity College will withhold as confidential the names and other identifying information of victims when issuing Timely Warnings.

The College may also distribute safety or informational messages concerning incidents or conditions that do not meet the criteria for a Clery Act Timely Warning when doing so would promote the safety and awareness of the College community.

Emergency Response and Notification

Trinity College maintains an Emergency Management Plan that establishes policies, procedures, responsibilities, and an organizational structure for responding to significant emergencies and dangerous situations affecting the College community.

Upon confirmation of a significant emergency or dangerous situation occurring on campus that involves an immediate threat to the health or safety of students or employees, Trinity College will, without unnecessary delay and taking into account the safety of the community, determine the appropriate segment or segments of the campus community to receive notification, determine the content of the notification, and initiate the emergency notification process.

The College may withhold or delay an emergency notification only when, in the professional judgment of responsible authorities, issuing the notification would compromise efforts to assist a victim or to contain, respond to, or otherwise mitigate the emergency.

TrinALERT Emergency Notification System

TrinALERT is Trinity College's primary emergency notification system and is used to rapidly communicate emergency information and protective-action instructions to members of the College community.

Depending upon the circumstances, emergency information may be distributed through text messages, email, telephone notifications, College websites, public-address or emergency notification systems, and other appropriate communication methods available to the College.

Emergency messages may include information concerning the nature and location of an emergency, areas to avoid, protective actions to take, evacuation or sheltering instructions, and other information necessary to protect the campus community. Students and employees are responsible for maintaining current emergency contact information through the College's designated system.

Confirmation and Initiation of Emergency Notifications

When Campus Safety or another appropriate College official receives information concerning a potential significant emergency or dangerous situation, the information will be evaluated using information available from Campus Safety personnel, law enforcement, fire or emergency medical services, emergency management officials, the National Weather Service, or other reliable sources, as appropriate.

Once a significant emergency or dangerous situation involving an immediate threat to the health or safety of students or employees on campus has been confirmed, authorized College officials will determine the appropriate segment or segments of the campus community to receive notification, determine the content of the notification, and initiate the appropriate notification system.

Emergency notifications will be initiated without unnecessary delay unless issuing the notification would, in the professional judgment of responsible authorities, compromise efforts to assist a victim or contain, respond to, or otherwise mitigate the emergency. When appropriate, Trinity College may provide follow-up notifications containing additional instructions, changes in conditions, or an "all clear" notification.

Emergency Response and Evacuation Testing

Trinity College tests its emergency response and evacuation procedures at least annually. Tests may be announced or unannounced and are designed to assess and evaluate the College's emergency plans and capabilities and to familiarize the campus community with emergency procedures.

The College documents each qualifying test, including a description of the exercise, the date and time of the exercise, and whether it was announced or unannounced.

Trinity College publicizes its emergency response and evacuation procedures in conjunction with at least one test each calendar year.

2025 Emergency Response Exercise: On November 24, 2025, from 8:30 a.m. to 1:00 p.m., Trinity College conducted an announced tabletop exercise involving a bomb-threat scenario with the College's Emergency Management Team. The exercise was conducted to test and evaluate the College's emergency response procedures and coordination.

Missing Student Notification Policy and Procedures

In accordance with the Higher Education Act and the Jeanne Clery Campus Safety Act, Trinity College maintains procedures for responding to reports of students residing in on-campus student housing who may be missing.

Any student, employee, or other individual who believes that a Trinity College student may be missing should immediately report the information to the Trinity College Campus Safety Department. There is no requirement to wait 24 hours before reporting a student missing or beginning an investigation.

Any report that a student may be missing will be referred immediately to the Campus Safety Department for investigation and appropriate action.

Confidential Contact Information

Students residing in on-campus student housing have the option to identify one or more confidential contact persons whom Trinity College will notify within 24 hours after Campus Safety or the appropriate law-enforcement agency determines that the student is missing. A student's confidential contact information will be maintained separately and will be accessible only to authorized College officials. The information will not be disclosed except to law-enforcement personnel in furtherance of a missing-person investigation. Students may designate or update their confidential missing-person contact through the College's designated student information process.

If a student is under 18 years of age and is not emancipated, Trinity College will notify the student's custodial parent or guardian within 24 hours after the student has been determined to be missing, in addition to notifying any confidential contact designated by the student.

Missing Student Investigation

Upon receiving a report that a student may be missing, Campus Safety will initiate an investigation without unnecessary delay. The investigation may include gathering information concerning:

- The student's name and physical description;
- The location, date, and time the student was last seen;
- The identity of the person or persons who last saw or communicated with the student;
- Vehicle information, when applicable;
- The student's anticipated destination or travel plans;
- Known circumstances that may affect the student's safety;
- Locations the student is known to frequent;
- Information regarding companions, friends, roommates, classmates, or associates; and
- Other information that may assist in locating the student.

Campus Safety may also review appropriate College records, access-control information, video surveillance, vehicle information available to the College, and other lawful investigative resources when appropriate.

Required Notifications

When Campus Safety or the appropriate law-enforcement agency determines that a student residing in on-campus student housing is missing, Trinity College will make the notifications required by federal law.

Within 24 hours of that determination:

- The student's designated confidential contact person or persons will be notified, if the student has designated such a contact;
- If the student is under 18 years of age and is not emancipated, the student's custodial parent or guardian will be notified in addition to any designated confidential contact; and
- The appropriate local law-enforcement agency will be notified unless that law-enforcement agency was the entity that determined the student to be missing.

Nothing in this policy prevents Trinity College Campus Safety from contacting law enforcement, a parent or guardian, an emergency contact, or other appropriate persons

sooner when circumstances indicate that immediate action is necessary to protect the student.

College officials will be notified as appropriate based upon the circumstances of the incident. Campus Safety will document the investigation and actions taken in an incident report.

Annual Security and Fire Safety Report

Trinity College prepares and distributes its Annual Security and Fire Safety Report in accordance with the Jeanne Clery Campus Safety Act and applicable federal regulations. The report contains required campus safety policies and crime statistics for the three most recent calendar years for crimes reported to Campus Security Authorities or local law-enforcement agencies that occurred within the College's Clery geography. The report also contains required fire-safety information and fire statistics for on-campus student housing facilities.

The Annual Security and Fire Safety Report is distributed annually to enrolled students and current employees and is made available to prospective students and prospective employees in accordance with federal requirements.

Clery Geography

For purposes of collecting and reporting Clery Act crime statistics, Trinity College classifies reportable locations within the following Clery geography categories:

Campus—Any building or property owned or controlled by Trinity College within the same reasonably contiguous geographic area and used by the College in direct support of, or in a manner related to, its educational purposes, including residence halls. Campus also includes certain College-owned properties within or reasonably contiguous to the campus that are controlled by another person, frequently used by students, and support institutional purposes.

On-Campus Student Housing Facilities—A subset of the on-campus category consisting of residence halls and other residential facilities for students located on campus.

Noncampus Building or Property—Any building or property owned or controlled by an officially recognized student organization, or any building or property owned or controlled by Trinity College that is used in direct support of, or in relation to, the College's educational purposes, is frequently used by students, and is not within the same reasonably contiguous geographic area of the main campus.

Public Property—Public property, including thoroughfares, streets, sidewalks, and parking facilities, that is within the campus or immediately adjacent to and accessible from the campus.

Trinity College reports applicable Clery Act crime statistics according to these geographic categories as required by federal law.

Annual Crime Statistics

Annual Crime Statistics

Criminal Offense	2023				2024				2025			
	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	1	0	0	2	0	0	1	1	1	2	2
Arson	0	0	0	0	0	0	0	0	0	0	0	0
Burglary	2	2	0	0	1	0	0	0	3	0	1	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	3	0	1	0	4	0	0	0	3	0	1	1
Robbery	0	0	0	0	0	0	0	0	0	0	1	1
Sex Offenses												
Rape	3	3	1	0	2	2	0	0	12	7	1	0
Fondling	1	1	0	0	3	0	0	0	3	1	0	0
Statutory Rape	0	0	0	0	0	0	0	0	0	0	0	0
Incest	0	0	0	0	0	0	0	0	0	0	0	0
VAWA Offenses												
Domestic Violence	1	0	0	0	0	0	0	0	0	0	0	0
Dating Violence	5	5	0	0	2	2	0	0	3	2	0	0
Stalking	3	0	0	0	5	0	0	0	3	0	0	0

ARRESTS	2023				2024				2025			
	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	0	0	0	0	0	0	0	0	2
Weapons Possession	1	0	0	0	0	0	0	0	0	0	0	1

DISCIPLINARY ACTIONS	2023				2024				2025			
	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	21	21	0	0	24	24	0	0	37	37	0	0
Drugs	7	7	0	0	6	6	0	0	9	9	0	0
Weapons Possession	0	0	0	0	1	1	0	0	0	0	0	0

* In November 2023, one Hate Incident was reported on campus involving destruction/damage/vandalism to property based on religion.

* On May 21, 2023, HPD Officer working a private duty (recognized a non-Trinity member) on campus wanted in a previous crime, arrested, and located a firearm.

* January 17, 2024, a student was found to be in possession of a large knife in a residential hall.

* Unfounded Crimes – Trinity College reported no Clery Act crimes as unfounded for the 2025 calendar year.

Disclosure of Hate Crimes

- In 2023 one Hate incident was reported on campus – Intimidation based on sexual orientation
- In 2024 one Hate incident was reported on campus – Intimidation based on religion
- In 2025 no hate crimes/incidents were reported on campus, but one incident was reported in the study away program.

Trinity College Disclosure of Crimes Reported to Campus Safety and other Administrative Entities for the Office of Study Away

Incident Type	Total 2023	Total 2024	Total 2025
Aggravated Assault	1	0	2
Arson	0	0	0
Burglary	0	0	0
Hate Crime	0	0	1
Murder/Manslaughter Non - Negligent	0	0	0
Murder/Manslaughter Negligent	0	0	0
Motor Vehicle Theft	0	0	0
Robbery	1	0	3
Sex Offenses	1	0	1
Domestic Violence	0	0	0
Dating Violence	1	0	0
Stalking	0	0	0

Federal Clery Act – Hate Crime Definition:

For Clery Act reporting, a hate crime is a reportable criminal offense that manifests evidence that a person or group was targeted because of their actual or perceived **race, religion, gender, gender identity, sexual orientation, ethnicity, national origin, or disability**. In addition to the primary Clery offenses, hate-crime reporting includes **larceny-theft, simple assault, intimidation, and destruction/damage/vandalism of property** when motivated by one of these bias categories.

Connecticut – Intimidation Based on Bigotry or Bias:

Connecticut law addresses hate-related criminal conduct under **C.G.S. §§ 53a-181j through 53a-181l**. These statutes address conduct committed with the specific intent to intimidate or harass another person, motivated in whole or substantial part by the person's actual or perceived **race, religion, ethnicity, disability, sex, sexual orientation, or gender identity or expression**. Depending on the degree, prohibited conduct includes physical injury or contact, property damage or defacement, and certain threats.

The Daily Crime and Fire Log

The Trinity College Campus Safety Department maintains a daily crime and fire log. The log includes crimes reported to the Campus Safety Department that occurred within the College's Clery geography and within the patrol jurisdiction of the Campus Safety Department. The fire log includes reported fires occurring in on-campus student housing facilities.

The Trinity College daily crime and fire log for the most recent 60-day period is available for public inspection, upon request, during normal business hours of 8:00 a.m. to 4:00 p.m. at the Campus Safety Department, 76 Vernon Street. Portions of the log older than 60 days will be made available within two business days of a request.

The daily crime log contains the following information:

- The nature of the crime;
- The date the crime was reported;
- The date and time the crime occurred;
- The general location of the crime; and
- The disposition of the complaint, if known.

The fire log contains information concerning fires reported in on-campus student housing facilities, including the nature of the fire, date and time the fire occurred, and general location of the fire.

Personally identifiable information regarding victims will not be included in the publicly available crime log.

Trinity College may temporarily withhold information from the crime log when there is clear and convincing evidence that releasing the information would:

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

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

Emergency Management Plan

Purpose

The Emergency Management Plan (EMP) establishes policies, procedures, and an organizational structure for responding to emergencies that are of sufficient magnitude to cause a significant disruption to all or portions of the College. The plan describes the roles and responsibilities of departments, schools, units, and personnel during emergency situations. Emergency procedures are designed to protect life and property through the effective use of College and community resources. Because emergencies may occur suddenly and without warning, the procedures are designed to be flexible and adaptable to contingencies of varying types and magnitudes.

Scope

The EMP is the College-level plan that guides the emergency response of College personnel and resources. It is the official emergency response plan of the College. Nothing in the plan is intended to limit the exercise of good judgment and common sense in circumstances not specifically foreseen or addressed by the plan.

The plan and the College's emergency response organization are subordinate to applicable federal, state, or local plans during a disaster declaration by the appropriate authorities. The EMP incorporates the Incident Command System to support interagency coordination, common emergency-response terminology and command structure, and the effective flow of information among responding agencies. The College cooperates with state and local public-safety agencies and other emergency-response partners in emergency planning and exercises.

Emergency Response and Notification

Upon confirmation of a significant emergency or dangerous situation involving an immediate threat to the health or safety of students or employees occurring on campus, Trinity College will, without delay and taking into account the safety of the community, determine the content of the notification and initiate the appropriate emergency notification system, unless issuing a notification would, in the professional judgment of responsible authorities, compromise efforts to assist a victim or to contain, respond to, or otherwise mitigate the emergency.

The Emergency Management Team and designated College officials, including the Campus Safety Department, are responsible for confirming emergencies, determining the appropriate segment or segments of the campus community to be notified, determining the content of the notification, and initiating the notification process. Emergency information may also be disseminated to the larger community when appropriate.

TrinALERT is Trinity College's emergency notification system. Designated College officials use TrinALERT to quickly notify students, faculty, and staff through methods that may include voice calls, text messages, email, and desktop alerts. Additional notification methods may include Alertus emergency beacons, public-address systems, megaphones, the College website, and other appropriate communication channels.

Testing and Exercises

The Core Emergency Management Team meets once a month and as needed due to planned or unplanned events. Trinity College tests its emergency response and evacuation procedures at least annually. Tests may be announced or unannounced. In conjunction with at least one test each calendar year, the College publicizes its emergency response and evacuation procedures. The College documents each test, including a description of the exercise, the date and time, and whether the test was announced or unannounced. Appropriate follow-through and after-action review are used to assess and evaluate emergency plans and capabilities.

Additional Information

Emergency Management Plan: <https://www.trincoll.edu/campus-safety/emergency-management-plan/>

TrinALERT: <https://www.trincoll.edu/campus-safety/trinalert/>

Annual Fire Safety Report

In accordance with the Higher Education Act and federal regulations governing institutional fire safety policies and fire statistics, Trinity College prepares an Annual Fire Safety Report because the College maintains on-campus student housing facilities. The report is published annually and may be issued together with the Annual Security Report as the Annual Security and Fire Safety Report.

For purposes of the Annual Fire Safety Report, on-campus student housing facilities include residence halls and other residential facilities that meet the federal definition of on-campus student housing. The report addresses each applicable on-campus student housing facility, including facilities located on property owned or controlled by the College and used for student housing.

The Annual Fire Safety Report includes, at a minimum, fire statistics for each on-campus student housing facility for the three most recent calendar years for which data are available; a description of each facility's fire safety system; the number of fire drills held during the previous calendar year; policies or rules concerning portable electrical appliances, smoking, and open flames; procedures for evacuation in the event of a fire; fire safety education and training policies; the titles of persons or organizations to which fires should be reported for inclusion in the statistics; and any plans for future fire-safety improvements determined necessary by the College.

Fire statistics include the number and cause of fires, the number of persons who received fire-related injuries resulting in treatment at a medical facility, the number of fire-related deaths, and the value of property damage caused by fire. These statistics are reported separately for each on-campus student housing facility.

The College also maintains a fire log for fires occurring in on-campus student housing facilities. The log records the nature, date, time, and general location of each reported fire and is maintained and made available in accordance with federal requirements.

The fire safety systems for individual on-campus student housing facilities are identified in the tables that follow this section. Portable fire extinguishers and other fire-protection equipment are provided and maintained in accordance with applicable fire and life-safety requirements.

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 alarm is 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.

Residence Hall	Fire Alarm Monitored by Campus Safety	Alarm Monitored by Fire Dept.	Sprinkler	Fire Drill Dates
Boardwalk	Networked/Addressable	No	Yes	Unoccupied
Clemens	Networked/Addressable	No	Yes	4/17/25 and 11/6/25
Cook	Networked/Addressable	Yes	Yes	4/23/25 and 11/13/25
Crescent St. Townhouse 1	Networked/Addressable	No	Yes	4/17/25 and 11/17/25
Crescent St. Townhouse 2	Networked/Addressable	No	Yes	4/17/25 and 11/17/25
Crescent St. Townhouse 3	Networked/Addressable	No	Yes	4/17/25 and 11/17/25
Crescent St. Townhouse 4	Networked/Addressable	No	Yes	4/17/25 and 11/17/25
Crescent St. Townhouse 5	Networked/Addressable	No	Yes	4/17/25 and 11/17/25
Doonesbury	Networked/Addressable	No	Yes	4/14/25 and 11/12/25
Elton	Networked/Addressable	No	Yes	4/15/25 and 11/13/25
Funston	Networked/Addressable	Yes	Yes	4/16/25 and 11/14/25
Goodwin/Woodward	Networked/Addressable	Yes	Yes	4/23/25 and 11/13/25
Hansen Hall	Networked/Addressable	Yes	Yes	4/14/25 and 11/12/25
High Rise	Networked/Addressable	Yes	Yes	4/14/25 and 11/12/25
Jackson	Networked/Addressable	Yes	Yes	4/25/25 and 11/14/25
Jarvis	Networked/Addressable	No	Yes	4/15/25 and 11/13/25
Jones	Networked/Addressable	No	Yes	4/15/25 and 11/13/25
North Campus	Networked/Addressable	No	Yes	4/14/25 and 11/12/25
Northam	Networked/Addressable	No	Yes	4/25/25 and 11/13/25
Ogilby	Networked/Addressable	No	Yes	Unoccupied
Park Place	Networked/Addressable	No	Yes	Unoccupied
Smith	Networked/Addressable	Yes	Yes	4/16/25 and 11/14/25
Stowe	Networked/Addressable	No	Yes	4/17/25 and 11/14/25
Summit East	Networked/Addressable	Yes	Yes	4/16/25 and 11/14/25
Summit North	Networked/Addressable	Yes	Yes	4/16/25 and 11/14/25
Summit South	Networked/Addressable	Yes	Yes	4/16/25 and 11/14/25
Vernon Place	Networked/Addressable	Yes	Yes	4/14/25 and 11/12/25
Trinity Hall	Networked/Addressable	Yes	Yes	4/16/25 and 11/14/25

Cultural Houses

Address	Fire Alarm Monitored by Campus Safety	City Connect	Sprinkler
65 Vernon St. (AASA)	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 rental unit 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.

Address	Fire Alarm	City Connect	Sprinkler
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 conducts fire drills in on-campus student housing facilities and documents the number of drills held during the previous calendar year. Drills are coordinated by appropriate College personnel and are used to reinforce evacuation procedures and test building fire alarm systems. Fire drill information for each on-campus student housing facility is listed in the fire safety system tables in this report.

Evacuation Procedures

In the event of visible smoke, fire, or activation of a building fire alarm:

Activate the nearest fire alarm pull station if the alarm has not already sounded.

Call the Campus Safety Department at (860) 297-2222 and/or call 911 when emergency assistance is required.

- Provide the location of the fire or smoke, a description of what is burning if known, and your name.
- Do not attempt to fight or extinguish a fire unless you are trained, it is safe to do so, and you have a clear exit path.
- Evacuate by the nearest safe exit. Close doors behind you as you leave when possible.
- Do not use elevators during a fire or fire alarm unless specifically directed by emergency personnel.
- Proceed to the designated assembly or gathering area and remain clear of entrances and emergency-response routes.
- Do not re-enter the building until authorized by the fire department or the Campus Safety Department.

- Report any known missing or remaining occupants and any relevant information to responding emergency personnel.

All students and employees should become familiar with emergency exits, evacuation routes, alarm systems, and designated gathering locations for the buildings they use. Fire extinguishers should be used only by persons who are trained and only when conditions permit safe use.

If smoke or fire prevents use of a normal exit, occupants should use an alternate safe exit when available. If safe evacuation is not possible, move to an area of refuge or other protected location, close doors, call 911 and the Campus Safety Department, and communicate your location to responders. Do not enter a smoke-filled stairwell or corridor.

ALL OCCUPANTS MUST EVACUATE IMMEDIATELY WHEN A BUILDING FIRE ALARM SOUNDS AND MUST NOT RE-ENTER UNTIL AUTHORIZED BY THE FIRE DEPARTMENT OR THE CAMPUS SAFETY DEPARTMENT.

Responsibilities at the Assembly Area

When safe to do so, responsible College personnel at the assembly area should meet responding Campus Safety and fire officials, account for occupants to the extent practicable, identify any known or suspected persons remaining in the building, and provide information about the location or nature of the emergency.

Emergency Personnel and All Clear

Once a building fire alarm has sounded, the fire department and/or the Campus Safety Department will manage the emergency scene in coordination with appropriate College personnel. Building occupants may re-enter only after an all-clear or authorization is given by the fire department or the Campus Safety Department. College personnel must not authorize re-entry before receiving that approval.

Alarm Reset and Fire Watch

Activated fire alarm systems must be restored to operational status as soon as practicable. Fire department, Campus Safety Department, Facilities, or other qualified personnel will coordinate reset or repair as appropriate. If a required fire alarm or life-safety system cannot be restored promptly, the Campus Safety Department will coordinate with appropriate College officials and fire authorities to determine interim protective measures, which may include a fire watch, restricted occupancy, or other actions required for safety.

Persons Needing Assistance

Individuals who may need assistance during an evacuation should become familiar with evacuation procedures for the buildings they use and should request assistance when needed. During an emergency, anyone unable to evacuate safely should, when possible, move to an area of refuge or other protected location, notify 911 and the Campus Safety Department of their exact location, and follow the directions of emergency personnel. The Campus Safety Department and other responding personnel will coordinate assistance based on the circumstances of the emergency. Individuals should not be carried or moved in a manner that creates additional danger unless immediate life safety requires it and the assistance can be provided safely.

Fire Prevention

Trinity College maintains fire-safety policies and rules for student housing, including requirements concerning portable electrical appliances, smoking, open flames, and other potential ignition sources. Students and employees are expected to follow applicable College housing and fire-safety policies and all directions from Campus Safety, Facilities, Residential Life, and fire officials.

General fire-prevention practices include:

- Do not overload electrical outlets or use damaged electrical cords or equipment.
- Do not cover, disable, remove, or tamper with smoke detectors, sprinklers, fire alarms, fire extinguishers, or other life-safety equipment.
- Follow College policies regarding smoking, candles, incense, open flames, cooking appliances, and other heat-producing devices in student housing.
- Do not leave cooking or other heat-producing equipment unattended while in use.
- Keep exits, corridors, stairwells, fire doors, and access to fire-safety equipment clear.
- Know at least two safe ways out of your residence hall or other regularly occupied building when possible.
- Immediately evacuate when a fire alarm sounds and follow the directions of emergency personnel.
- Report fire hazards, damaged fire-safety equipment, and fires to the Campus Safety Department.

Fire Safety Education and Training

Fire safety information and evacuation procedures are communicated to students and employees through College policies, housing information, drills, training, and other safety communications as appropriate. Fire drills and related exercises reinforce evacuation expectations and provide an opportunity to assess alarm and evacuation procedures.

Reporting Fires

For purposes of emergency response and inclusion in the College fire log and annual fire statistics, students and employees should report any fire occurring in an on-campus student housing facility to the Campus Safety Department. In an active emergency, call 911 and notify the Campus Safety Department at (860) 297-2222.

Fire Log

Trinity College maintains a written, easily understood fire log of fires reported in on-campus student housing facilities. The log records the nature, date, time, and general location of each fire and is updated within two business days after information is received. The most recent 60-day portion of the fire log is available for public inspection during normal business hours. Portions of the log older than 60 days will be made available within two business days of a request for public inspection.

Fire Statistics

For each on-campus student housing facility, Trinity College collects and reports fire statistics for the three most recent calendar years for which data are available. The statistics include:

- The number of fires and the cause of each fire.
- The number of people who received fire-related injuries that resulted in treatment at a medical facility, including an on-campus health center.
- The number of fire-related deaths.
- The value of property damage caused by each fire.

Fire causes are classified using the applicable federal reporting categories, including unintentional fire, intentional fire, and undetermined fire. Unintentional fire causes may include cooking, smoking materials, open flames, electrical heating equipment, hazardous products, machinery or industrial equipment, natural causes, and other causes.

Plans for Future Fire-Safety Improvements

Trinity College evaluates fire-safety systems, practices, and identified hazards on an ongoing basis. Future fire-safety improvements will be implemented as determined necessary by the College in coordination with appropriate fire and life-safety authorities.

Fire Statistics

The following fire statistics are reported for on-campus student housing facilities for calendar years 2023, 2024, and 2025.

2023

Date & Time of Fire	Name of Housing Facility	Address	Cause of Fire	Fire Related Injuries	Fire Related Deaths	Property Damage
3/15/2023 at 11:12	Life Science Center	300 Summit St.	Faulty laptop charger	0	0	Smoke in area and electrical outlet
4/27/2023 at 22:25	High Rise Parking Lot	Allen Place	Unknown source; minor dumpster fire	0	0	0
11/3/2023 at 20:26	Mather Hall Kitchen	300 Summit St.	Grease fire under the grill	0	0	0

2024

Date & Time of Fire	Name of Housing Facility	Address	Cause of Fire	Fire Related Injuries	Fire Related Deaths	Property Damage
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In 2024, no fires occurred in on-campus student housing.

2025

Date & Time of Fire	Name of Housing Facility	Address	Cause of Fire	Fire Related Injuries	Fire Related Deaths	Property Damage
3/24/25 at 0237 hours	Funston	300 Summit St	Unknown	0	0	0

FIRES – ON-CAMPUS STUDENT HOUSING FACILITIES

Name of Facility	Address	2023	2024	2025 Fires	2025 Injuries	2025 Deaths
Boardwalk	183-85 Allen Pl.	0	0	0	0	0
Clemens	216 New Britain Ave.	0	0	0	0	0
Cook	300 Summit St.	0	0	0	0	0
Crescent St. Townhouse 1	9–25 Crescent St.	0	0	0	0	0
Crescent St. Townhouse 2	31–51 Crescent St.	0	0	0	0	0
Crescent St. Townhouse 3	53–69 Crescent St.	0	0	0	0	0
Crescent St. Townhouse 4	94–112 Crescent St.	0	0	0	0	0
Crescent St. Townhouse 5	76–92 Crescent St.	0	0	0	0	0
Doonesbury	90-92 Vernon St.	0	0	0	0	0
Elton	300 Summit St.	0	0	0	0	0
Funston	300 Summit St.	0	0	1	0	0
Goodwin/Woodward	300 Summit St.	0	0	0	0	0
Hansen Hall	103 Vernon St.	1	0	0	0	0
High Rise	175 Allen Pl.	0	0	0	0	0
Jackson	300 Summit St.	0	0	0	0	0
Jarvis	300 Summit St.	0	0	0	0	0
Jones	300 Summit St.	0	0	0	0	0
North Campus	163 Allen Place	0	0	0	0	0
Northam	300 Summit St.	0	0	0	0	0
Ogilby	134 Vernon St.	0	0	0	0	0
Park Place	187-89 Allen Pl.	0	0	0	0	0
Smith	300 Summit St.	0	0	0	0	0
Stowe	194-96 Crescent St.	0	0	0	0	0
Summit East	300 Summit St.	0	0	0	0	0
Summit North	300 Summit St.	0	0	0	0	0
Summit South	300 Summit St.	0	0	0	0	0
Vernon Place	114 Vernon St.	0	0	0	0	0
Wheaton (Trinity Hall)	300 Summit St.	0	0	0	0	0
129 Allen Place	129 Allen Place	0	0	0	0	0
1715 Broad Street	1715 Broad Street	0	0	0	0	0
AASA	65 Vernon Street	0	0	0	0	0
La Voz Latina	69 Vernon Street	0	0	0	0	0
UMOJA	72 Vernon Street	0	0	0	0	0
TOTAL		1	0	1	0	0

FIRES – RENTAL PROPERTIES

Address	2023	2024	2025 Fires	2025 Injuries	2025 Deaths
129 Allen Place	0	0	0	0	0
141-143 Allen Place	0	0	0	0	0
145-147 Allen Place	0	0	0	0	0
149-151 Allen Place	0	0	0	0	0
155-157 New Britain Ave.	0	0	0	0	0
1580 Broad Street	0	0	0	0	0
1705-1707 Broad Street	0	0	0	0	0
1713-1715 Broad Street	0	0	0	0	0
199-201 Allen Place	0	0	0	0	0
209-211 Zion Street	0	0	0	0	0
213-219 Zion Street	0	0	0	0	0
225-227 Zion Street	0	0	0	0	0
TOTAL	0	0	0	0	0

No fires were reported in the listed rental properties for 2025.

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