

2018 ANNUAL
**CAMPUS SECURITY
AND FIRE SAFETY
REPORT**



BENTLEY
UNIVERSITY

From the Executive Director of Public Safety

I want to take this opportunity to welcome you to Bentley University, where we make every effort to provide a safe and secure environment for all members of the campus community. This publication represents one of our efforts to comply with the provisions of the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act. While the reported crime at Bentley is comparatively low, we must keep in mind that the potential for crime does exist. By working together and embracing a community-policing philosophy, we can successfully minimize the incidents of crime on our campus.



The men and women of the Bentley University Police Department are dedicated to maintaining a safe campus environment for all. However, we can achieve a truly safe campus only through the cooperation of all students, faculty and staff. Each of us must assume personal responsibility by reporting crime and taking precautions to prevent ourselves from being victimized.

The information in this booklet is meant to inform the campus community of the policies, procedures and programs that exist at Bentley, as they relate to crime awareness. I urge you to take the time to read it thoroughly or review it online at bentley.edu/campus-security-safety-report. Please feel free to contact me with any questions.

A handwritten signature in black ink that reads "Ernest H. Leffler". The signature is written in a cursive, flowing style.

Ernest H. Leffler
Executive Director of Public Safety
and Chief of Police

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NONDISCRIMINATION Bentley University does not discriminate in admission or access to or treatment or employment in any of its educational programs or activities, including scholarships, loans and athletics, on the basis of race, color, religion, sex, sexual orientation, gender identity and/or expression, marital status, age, national origin, citizenship status, disability, genetic information, military or veteran status. Bentley University maintains and supports affirmative action plans for its workplace in compliance with federal law. Equal opportunity extends to all aspects of the employment relationship, including hiring, promotions, training, working conditions, compensation and benefits. Bentley University's policies and practices reflect the university's commitment to nondiscrimination in all areas of employment. The university complies with Title VI of the Civil Rights Act, Title IX of the Education Amendments, Section 504 of the Rehabilitation Act and the Americans with Disabilities Act, and Revenue Procedure 75-50 prohibiting such discrimination. Anyone believing that he or she has experienced adverse treatment may register a complaint with Ann Dexter, Associate Vice President and Equal Opportunity Officer, at 781.891.2640 or to the Title IX coordinator, Erin Kelley at 781.891.2161

The information in this booklet is provided as part of the university's commitment to campus safety and security, and to meet compliance standards set forth in the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act. Bentley University is an institution of higher education containing one main campus of approximately 163 acres within the Waltham, Massachusetts, city limits. Approximately 5,500 students are enrolled in courses at Bentley University, and 1,200 faculty and staff support the institution.

Security Awareness and Crime Prevention

Like most other colleges, universities and municipalities, Bentley strives to be proactive rather than reactive — to prevent crimes from occurring. A primary vehicle for accomplishing this goal is the department's crime prevention program. Whenever possible, crime prevention programs are conducted in concert with educational programs sponsored by university organizations. The university's crime prevention program takes a two-part approach to the prevention of crime and criminal misconduct. It is designed to eliminate or minimize opportunities for crime on campus, and to create an atmosphere in which students and other community members become more responsible for their own security and the security of others. Following is a list of programs and services provided by the University Police Department to promote crime prevention awareness.

Emergency Notifications: In the case of a major crisis or catastrophic event, Bentley can alert the community through an emergency notification system that is capable of delivering information regarding the crisis and providing instructions as to what steps to take to ensure safety. The system allows for emergency notification via campus email, siren system, classroom notifications, and office, home, and cell phone numbers (including text messaging). Alerts will also be posted on the Bentley website.

Safety Escort Service: Members of the Bentley community may request a safety escort from one campus location to another whenever there is a concern for their safety and security on campus. Personal safety escorts are available 24 hours a day and may be requested by calling the University Police at 781.891.2201.

Online New Student and Parent Orientation: Programs are provided for students and parents to inform them of the services provided by University Police.



New Employee Orientation: All new employees receive information regarding fire as well as general safety and security measures on campus and information about crime reporting required by Clery.

New Student Orientation: Held at the beginning of each academic year, this orientation promotes closer relationships between the police and students. The department coordinates this crime prevention and community-building program with the Division of Student Affairs.

Residence Hall Safety and Security Programs: The University Police Department works closely with the Residential Center to ensure our residence halls remain safe. All first-year resident students are required to

attend a one-hour mandatory safety presentation conducted by University Police officials during Orientation that covers an array of topics regarding services provided by the University Police, fire safety policies, building egress procedures and general safety. Additionally, the University Police Department may conduct safety presentations to residents of specific residence halls at the request of Residential Center staff should safety concerns or crime trends develop.

Emergency Management Team: This committee meets monthly to identify and address general safety issues on campus, and to review the university's response protocols in the event of a crisis. The committee is comprised of various Bentley staff and faculty, including the Chief of Police.

Community Policing Team: The University Police Department uses a team of officers to make and maintain contacts with various organizations throughout campus. As part of our effort to involve campus citizens in a community-police partnership, the process began in the residence halls and has been a successful way to promote community involvement in safety and security issues.

Emergency Telephones: Emergency and help phones are located both inside campus buildings and in exterior locations to provide easy contact with University Police for general assistance and emergencies.

Closed-Circuit Television Surveillance: Closed-circuit cameras located throughout campus are recorded and may be monitored by staff at police headquarters.



Personal Safety Programs: These programs are provided by request to any community member or group. Presentations offer helpful hints and self-defense techniques using everyday items.

Rape Aggression Defense (R.A.D.) Training Classes: The University Police Department has trained instructors certified to teach this unique self-defense program. The R.A.D. program, specifically designed for women, offers self-defense tactics and training designed to assist women in defending themselves against sexual assault.

Rape Awareness, Education and Prevention: In addition to the R.A.D. program and in cooperation with numerous student organizations, University Police delivers presentations on rape awareness, education and prevention. Call 781.891.2201 for more information.

CPR and Standard First Aid Training: This program is provided by request to any group within the university community. Though not commonly associated with crime or criminal activity on campus, the program teaches self-sufficiency and concern for others.

Instructors are members of University Police who are properly trained and certified by the American Red Cross or the American Heart Association.



Printed Crime Prevention Materials:

Printed brochures, posters and similar resources are always on hand at the Callahan Police Station, as are various crime prevention videos and films. These are used to conduct programs for students in the residence halls or elsewhere on campus.

Security Surveys: Comprehensive security surveys may be conducted whenever a concern for security is identified. University Police officers trained in conducting security surveys identify problems and recommend corrective action to improve security on campus.

Drug and Alcohol Policies

In addition to maintaining strict compliance with all state and federal laws, Bentley has its own drug and alcohol policies. The following acts are prohibited on university premises or at Bentley-sponsored activities and events: distribution, possession or use of any illegal drug and/or the use, possession or distribution of any controlled substance or marijuana without legal authorization; providing alcoholic beverages to individuals under 21 years of age; possession of alcoholic beverages by individuals under 21 years of age; illegal possession of an open container of an alcoholic beverage; public intoxication; driving while intoxicated; and drinking alcoholic beverages in an unlicensed public place.

In addition to disciplinary sanctions imposed through university procedures, including suspension or expulsion from the university, students and employees may face criminal prosecution and imprisonment under federal and state laws. The online Student Handbook lists details of felony and misdemeanor crimes and subsequent disciplinary actions for students. University employees may be disciplined under the Human Resources process. Faculty and staff members are not excluded from prosecution under federal and state laws merely by virtue of their employment.

Bentley recognizes that there are serious health risks associated with the misuse and abuse of mind-altering drugs, including all controlled substances and alcohol. These risks include, but are not limited to: physical and psychological dependence; damage to the brain, pancreas, kidneys and

lungs; high blood pressure, heart attacks and strokes; ulcers; birth defects; diminished immune system; and death. The Centers for Health, Counseling & Wellness, and the Alcohol and Other Drug Resource Center provide assessment and referral services to students. These same offices serve as informational and educational resources for alcohol and other drug-related matters. Information about educational materials and programs offered is available from the Centers for Health, Counseling & Wellness at **781.891.2222** or the Alcohol and Other Drug Resource Center at **781.891.2777**. Assistance for employees can be obtained through Human Resources or confidentially through the Employee Assistance Program at **800.648.9557**.

Sexual Assault, Domestic/Dating Violence, Stalking Policies

This section applies to all incidents of sexual assault which include, rape, fondling, incest, and statutory rape. It also applies to domestic or dating violence and stalking incidents. Individuals are urged to report any of the above incidents to University Police as soon as possible, regardless of where the offense took place and whether or not the offender is known to the individual reporting. University Police will work closely with the reporting party to ensure appropriate medical care and counseling services are offered. Police will also assist victims/survivors in notifying appropriate off-campus law enforcement authorities, when applicable. University Police has male and female officers specially trained in sexual assault investigation who are available 24 hours a day. There are strict laws governing the protection of a victim's name during a criminal process, it will be kept private. Contact University Police or the Executive Director of Public Safety if you have any questions about how to proceed with criminal prosecution.

We recognize the delicate nature of these types of incidents and the difficulty inherent in talking about them. Of utmost importance is the emotional well-being of the victim. Resources are available to victims through a number of on- and off-campus offices. On campus University Police, the Office of the Dean of Student Affairs, the Centers for Health, Counseling & Wellness, Spiritual Life Center, or the Residential Center can be contacted for support. See Title IX Policy in this book for further information about accommodations that can be made for survivors. All reporting parties will be given the Sexual and Relationship Violence Resource Guide which includes both on and off campus resources, options for reporting, accommodations that can be made, and students' rights under Title IX.

It is very difficult to know in the immediate aftermath of a sexual assault, stalking, domestic or dating violence incident whether or not an

individual will want to pursue legal charges or seek an order of protection. Having evidence collected does not commit an individual to reporting or prosecuting the conduct; the evidence can be sent to the crime lab anonymously and held for a period of fifteen years. Physical evidence can usually be collected up to five days after an assault, though the likelihood of capturing evidence decreases with time. Showering, urinating, and brushing teeth may destroy evidence. Clothing and bedding may contain evidence and can be taken to the Emergency Room in a paper bag (not plastic) or given to police. Drugs used in sexual assaults often leave the body very quickly. Individuals suspecting they may have been drugged should attempt to collect urine to take to the ER if urination is necessary before arriving there. All electronic evidence should be saved or otherwise preserved. This is especially important in stalking cases. Witness statements will be requested for prosecution, so giving those names to police, if an individual chooses to report, will be important.

If an individual chooses to report one of the above crimes, there are several options: University Police **781.891.2201**, the Waltham Police **781.893.1212**, or the Middlesex County District Attorney's Office, located at the Waltham District Court **781.897.8650**. Cases can also be pursued through the university's judicial system via the Title IX Coordinator. Please see the Title IX Policy section of this book for further information regarding proceeding through the University judicial system, potential sanctions for students or employees, interim support measures, and accommodations.

Registered Sex Offender Information

In compliance with the Federal Campus Sex Crime Prevention Act, current sex offender information for students or employees of the university can be obtained through the Waltham Police Department Detective Unit, located at 155 Lexington Street in Waltham. Additionally, level-three offender information can be obtained from the city of Waltham's website: city.waltham.ma.us/police-department/pages/sex-offender-page-2.

If you have any questions, please call the Bentley University Police Department at **781.891.2201**.

Community Responsibility

The cooperation and involvement of students, faculty and staff in their own safety and security is crucial to maintaining a safe campus environment. All members of the Bentley community can assume responsibility for their own safety and well-being, and the security of their belongings by taking simple, common sense precautions. Bentley staff make every effort to protect,

serve and care for everyone in the community, but the university cannot help those unwilling to help themselves. The Bentley University Police and dispatchers hope that all members of the community form a partnership built on mutual respect and cooperation, and through this partnership ensure a safe and secure learning, living and working environment.

Personal Safety Tips

Although the Bentley campus is reasonably safe, crime can happen anywhere and safety can be compromised at any time. No one set of guidelines can completely protect you, but following the tips below can minimize your chances of being victimized. You should always trust your own instincts and follow the rules of common sense.

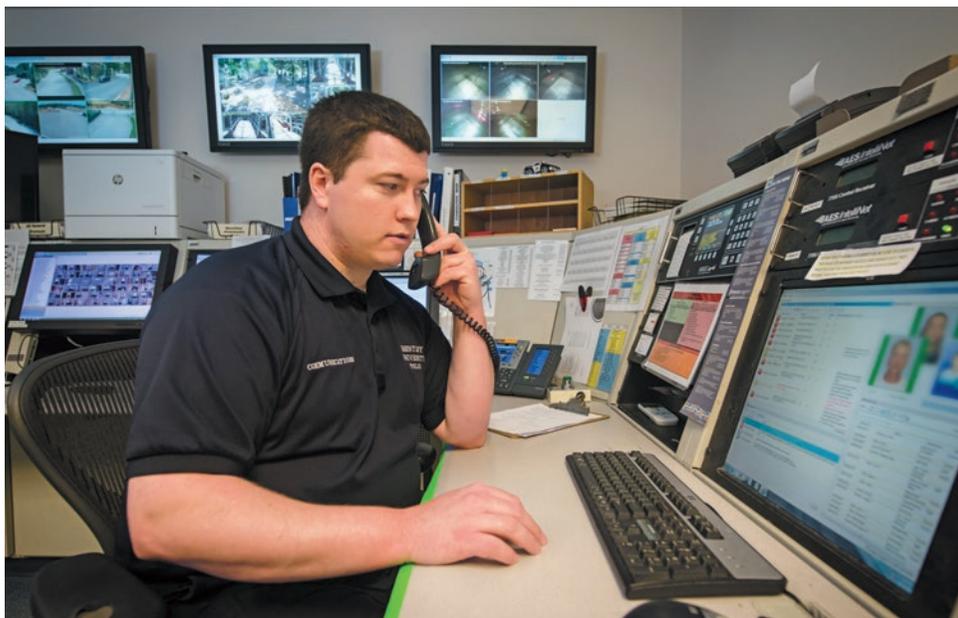
- Do not prop open residence hall or apartment complex doors.
- Be mindful of tailgating. Tailgating is following or walking closely behind a resident/person into a secured or locked facility without permission and without being identified. Attempts to do this should be reported to University Police.
- Do not allow door-to-door salespeople to enter your room. University ordinances prohibit soliciting and the alleged salesperson may be “casing” your room for later theft. This includes letting delivery people into the building.
- Lock your door when sleeping or showering.
- Lock your door when you leave, regardless of the length of time you plan to be gone.
- Keep small items of value, such as wallets, money and jewelry, out of plain view or in a security box.
- Keep a record and photograph of all valuables noting descriptions and serial numbers. You can also engrave all personal belongings, contact University Police for additional information.
- Report all thefts immediately to University Police at **781.891.2201**.
- Get to know others around you and watch out for each other.
- Do not leave notes where anyone can read them stating where, when or how long you will be gone on any electronic media messages, and do not leave notes containing room combination numbers, ATM pin codes, or computer passwords where others can see them.

- Do not take in overnight guests whom you do not know.
- Close your drapes and blinds at night.
- Report all doors, locks and windows that are in need of repair to your Resident Assistant as soon as possible
- Always ask who is at the door before you open it and use the peephole.
- Never give out your room combination or loan your Bentley ID card to anyone else.
- Notify professional staff if there are maintenance or lighting deficiencies that may compromise building security or make you feel less safe.
- If you receive harassing or annoying phone calls, hang up right away with no conversation, reaction or emotion. Then call University Police at **781.891.2201** to report it.
- Do not invite people you “meet” on the Internet to your room or to stay overnight in your room.
- Watch out for your friends and fellow students/employees. If you see someone who looks like they could be in trouble or needs help, ask if they are ok and contact University Police if necessary.
- Safely intervene when you notice people who seclude, hit on, try to make out with or have sex with people who are incapacitated.
- Speak up when someone discusses plans to take sexual advantage of another person. If you have concern for another member of the Bentley community, you can contact the University Police anonymous tip line or fill out the care report form at bentley.edu/bentley-cares. If it is an emergency call University Police at **781.891.3131**.
- Believe someone who discloses sexual assault, abusive behavior, or experience with stalking and encourage them to consult resources on campus, which can be found at Bentley.edu/titleix.
- Refer people to on- or off-campus resources listed in this document, along with bentley.edu/titleix for support in health, counseling, or with legal assistance.
- Communicate nonverbal cues that you are calm, confident, and know where you are.
- Cross streets using crosswalks and electronic walk signals.
- Stay in well-lit, busy areas.

- When using public transportation, follow these rules: use a busy, well-lit bus stop, sit near the driver, and don't sleep.
- Don't be afraid to tell someone who is harassing you to leave you alone in a firm, loud voice.
- Trust your instincts — if something or someone makes you uneasy, get out or away.
- Walk or jog with a companion.
- Keep your car locked at all times.
- Avoid flashing cash or valuables.
- Have your key in hand as you approach your car, dorm or apartment.
- Call University Police for a personal safety escort if you feel concerned for your safety while on campus.

Reporting Criminal Actions or Emergencies

The Bentley University Police Department is responsible for campus law enforcement, security and emergency response. It is the department's mission to provide a comprehensive program of law enforcement, security and related public safety services to help ensure the campus remains a safe and pleasant place in which to live, study and work. The Michael Callahan Police Station headquarters is located on the main campus, on the hill at the Beaver Street entrance. It is open and staffed 24 hours a day by trained professional police, security and communication personnel. Members of the Bentley University community are urged to immediately report crimes, suspicious activity or other emergencies to the Bentley University Police Department by calling **781.891.3131**, and members of the University Police Department will promptly respond. To obtain information or request security services, community members should call the University Police business line at **781.891.2201**. All phone lines routed to University Police are staffed 24 hours a day. Crimes can also be reported anonymously or confidentially by filling out and submitting the form provided on the University Police website bentley.edu/campus-life/anonymous-tip-line. Well-marked red emergency phones are located throughout the interiors of campus buildings in the academic area of the university. Well-marked yellow emergency phones are located throughout the common corridors of residence halls. These phones directly connect the caller to the University Police dispatcher and can be used to report police, fire or medical emergencies. In addition to the red emergency phones, there are a number of beige courtesy phones inside campus buildings that can be used to



contact University Police for general business inquiries and non-emergency service requests. These phones can also be used to connect to any other campus phone. If you wish to contact University Police from the courtesy phones, simply dial **extension 2201**.

Exterior “help” phones with emergency direct-dial service to University Police are also located near entrances of buildings throughout the campus beneath large, blue reflective “Help” signs. Help phones at the exteriors of residence halls not only allow for emergency calls to the University Police but also allow users to dial a friend for access to a particular hall, and are free of charge to anyone seeking information or assistance. Labels bearing the University Police business, snow information, and emergency phone numbers are placed on all of the phones described above. These numbers are also found on publications printed by the University Police, as well as in the campus phone directory. The University Police Department maintains both direct telephone and two-way radio contact with the Waltham Police Department. University Police also has direct radio service with the Waltham Fire Department and local ambulance service through the city of Waltham’s 911 system.

Law Enforcement Authority and Interagency Relationships

University Police officers are commissioned in accordance with the provisions of Chapter 22C Section 63 of the Massachusetts General Laws.

They have full law enforcement authority, including arrest powers, in and upon all property owned, occupied or used by the Bentley community.

All University Police officers are graduates of a police academy conducted and sanctioned by the Massachusetts State Police or the Massachusetts Municipal Police Training Committee. Police officer recruit training academies comprise several months of in-depth training in all aspects of law enforcement, followed by several weeks of field training under the close supervision of a qualified Police Field Training Officer. In addition to formal law enforcement training, Bentley police officers are provided with training specific to campus law enforcement issues to enhance their ability to provide the best service possible to the campus community. Annual in-service training is provided to all officers, and they are frequently assigned to specialized training programs to enhance their professional development.

The University Police Department maintains excellent working relationships with the Waltham Police Department, the Middlesex County District Attorney's Office, the Massachusetts State Police, other local, campus, state and federal law enforcement agencies and all appropriate segments of the criminal justice system. While there is no written memorandum of understanding with Waltham Police, there is frequent communication between the Chiefs of the departments to ensure our continued working relationship. Crime reports and information are exchanged on a routine basis, including information provided by Waltham Police regarding all reports involving Bentley students.

Various members of University Police participate actively in professional associations that enhance their proficiency in areas specific to their work responsibilities. Members of the department maintain



active membership in the International Association of Campus Law Enforcement Administrators, the Northeast Colleges and Universities Security Association, the Massachusetts Association of Campus Law Enforcement Administrators, the American Society for Industrial Security, the Massachusetts Chiefs of Police Association, the International Association of Chiefs of Police, the Massachusetts Police Accreditation Commission and the Massachusetts Crime Prevention Officers Association.

Access to Campus Facilities

With the exception of residence halls, most campus buildings and facilities are accessible to members of the campus community, guests and visitors during normal hours of business, and during designated hours on weekends and holidays depending on the variety of events and activities taking place on campus. Once buildings are secured, people requiring access to academic or administrative buildings on campus must contact University Police at **781.891.2201** to be informed of the access requirements established by the university.

Exterior doors to all residence halls remain locked 24 hours a day. Access to residence halls is controlled by electronic card readers; unlimited access is available to all authorized resident students via their Bentley ID card. Guests and visitors who wish to enter residence halls should call their hosts or contact the Residential Center or University Police for assistance. All residence halls are equipped with intrusion alarms that detect unauthorized access and doors that are propped open. These alarms are monitored at University Police headquarters; University Police officers are dispatched to investigate any reported alarm violations.

Maintenance and Security of Campus Facilities

Bentley maintains a strong commitment to safety and security. Exterior lighting is an important component of keeping the campus safe. Motor vehicle parking lots, pedestrian walkways and building exteriors are well lighted. Members of the university community are strongly encouraged to always use designated walkways, pathways and crosswalks both on and off campus for their safety. The University Police and Facilities Management staff routinely conduct inspections and surveys of exterior lighting on campus to identify lighting problems. The Facilities Management Department gives high priority to maintenance of exterior lights in need of repair or replacement.

More serious maintenance problems are rectified immediately through an emergency notification system maintained between University Police and

the Facilities Management trades supervisors. This system provides for the response of Facilities Management tradespeople 24 hours a day. Members of the campus community are encouraged to report any maintenance concerns to Work Order Control at **781.891.2208** during regular business hours or the University Police Department at **781.891.2201** after hours.

As a part of routine and directed patrols, University Police Department personnel inspect exterior doors on campus facilities. Doors are checked to ensure that their automatic closing and locking units are working properly. Exterior doors on all campus academic and administrative buildings are locked and secured each evening by campus police and/or campus security officers from the University Police Department. These officers also report door and security hardware operating deficiencies to ensure prompt repairs are made.

Many parking lots and public areas of the campus are routinely monitored by closed-circuit cameras. These cameras forward their pictures to the display and control screens located in the University Police Department's communications area. Communications specialists routinely use the closed-circuit television system to identify problems that may require a police response.

Parking lots and public areas on campus are regularly patrolled by campus police and campus security officers.

Crime Reporting

Bentley makes every effort to keep the community informed about crime and crime-related problems. The university's duty to inform is taken very seriously. As a result, information related to crime and criminal activity is provided to the community in an accurate and timely fashion. Notification efforts and methods include, but are not limited to, the initiatives listed below.

Annual Campus Security and Fire Safety Report: A comprehensive annual report of crime-related information is compiled, published and available online. The report is also available by request.

Public Log: The University Police Department prepares and maintains an incident log for public viewing. This log is available for inspection during regular business hours.

Clery Log: The University Police Department prepares and maintains an incident log of all crimes committed on, or near, campus. This log is available to anyone who requests to view it.

Residence Hall Crime Prevention Programs. Each residence hall program features an overview of how students can help in the prevention of crime. These programs are done in conjunction with Residential Center staff and address issues to enhance students' overall security awareness.

Timely Warning Notices. University Police provide timely warning notices to the community, that withhold the names of victims as confidential, and that will aid in the prevention of similar occurrences, whenever an incident is considered by the university to represent a threat to the community. Notices will be made using our emergency notification system and/or campus email.

Crime Definitions and Statistics

Convinced that an informed public is a safety-conscious public, Bentley gladly provides all information related to the safety and security of the campus community. The university willingly complies with all laws pertaining to the reporting of crime and the public's right to information. Bentley also maintains strict compliance with the privacy act, Buckley Amendment, and all other laws governing the release of personal information. Personally identifying information of victims is not included in publicly available logs. In accordance with the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act, the following definitions and statistics are provided for your information. They are a compilation of the crimes (listed below) reported to Waltham Police, Bentley Police, or any Bentley Campus Security Authority. CSAs include any member of the Bentley University Police Department, any individual who has responsibility for security, but who is not a member of the Police Department, any individual identified by the University as someone to whom a crime should be reported; and any University official who has significant responsibility for student and campus activities. Individuals who fall under this definition may vary among departments and areas. The following are examples of CSAs, but not an exhaustive list:

- All Student Affairs staff members, including Vice President for Student Affairs/Dean of Students, Title IX Coordinator, all staff from the Residential Center, staff from the Health, Wellness, and Counseling Centers, and Athletics staff
- Staff from the Cronin Center for International Education
- Staff from Graduate and Undergraduate Academic Services

Crime statistics are collected and reported in accordance with the University Police Clery Reporting Procedure. If you have questions concerning these statistics or campus safety in general, contact the Executive Director of

Public Safety. All crimes are listed in the Clery Crime Log, however, only the following crimes are reported annually in this report.

Murder/Non-Negligent Manslaughter: Defined as willful killing of one human being by another.

Manslaughter by Negligence: Defined as the killing of another person through gross negligence.

Sexual Assault: Under the Violence Against Women Act (VAWA), the definition of sexual assault is an offense that meets the definition of rape, fondling, incest, or statutory rape as used in the FBI's Uniform Crime Reporting (UCR) program. Per the National Incident-based Reporting System User Manual from the FBI UCR Program, a sex offense is "any sexual act directed against another person without the consent of the victim, including instances where the victim is incapable of giving consent."

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

Massachusetts defines Rape as sexual intercourse or unnatural sexual intercourse with a person against his will, by force or threat of bodily injury.

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

Massachusetts defines Indecent Assault and Battery on a person age 14 or over as indecent assault and battery against a person's will. An indecent act is one that is fundamentally offensive to contemporary standards of decency. An assault and battery may be "indecent" if it involves touching portions of the anatomy commonly thought private, such as a person's genital area or buttocks, or the breasts of a female.

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

Massachusetts defines Incest as persons within degrees of consanguinity within which marriages are prohibited or declared by law to be incestuous and void, who intermarry or have sexual intercourse with each other, or who engage in sexual activities with each other, including but not limited to, oral or anal intercourse, fellatio, cunnilingus, or other penetration of a part of a person's body or insertion of an object into the genital or anal opening of another person's body, or the manual manipulation of the genitalia of another person's body.

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

Massachusetts defines Statutory Rape as unlawful natural or unnatural sexual intercourse with a person under 16 years of age.

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

Aggravated Assault: Defined as an unlawful attack by one person upon another for the purpose of inflicting severe or aggravated bodily injury. This type of assault usually is accompanied by the use of a weapon or by means likely to produce death or great bodily harm.

Burglary: Unlawful entry of a structure to commit a felony or a theft.

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

Arson: Any willful or malicious burning or attempt to burn, with or without intent to defraud, a dwelling house, public building, motor vehicle or aircraft, personal property of another, etc.

Domestic Violence: Includes felony or misdemeanor crimes 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 cohabitating with or has cohabitated with the victim as a spouse, by a person similarly situated to a spouse of the victim under the domestic or family laws of the Commonwealth of Massachusetts, or by any other person against an adult or youth victim who is protected from the person's acts under the domestic or family violence laws of the jurisdiction.

Massachusetts law defines domestic violence as an assault or assault and battery on a household or family member. Household or family member is defined as persons who (i) are or were married to one another, (ii) have a child in common regardless of whether they have ever married or lived together or (iii) are or have been in a substantive dating or engagement relationship; provided, that the trier of fact shall determine whether a relationship is substantive by considering the following factors: the length of time of the relationship; the type of relationship; the frequency of interaction between the parties; whether the relationship was terminated by either person; and the length of time elapsed since the termination of the relationship.

Dating Violence: The VAWA definition of dating violence is violence committed by a person who is or has been in a social relationship of a

romantic or intimate nature with the victim. The existence of such a relationship shall be based on the reporting party's statement and with consideration of the length of the relationship, the type of relationship, and the frequency of interaction between the persons involved in the relationship. For purposes of this definition, dating violence includes, but is not limited to, sexual or physical abuse or the threat of such abuse.

Per Massachusetts statute above, dating violence is included in the definition of domestic violence.

Stalking: The VAWA definition of stalking is engaging in a course of conduct directed at a specific person that would cause a reasonable person to (a) fear for the person's safety or the safety of others; or (b) suffer substantial emotional distress.



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

Massachusetts defines stalking as willfully and maliciously engaging in a knowing pattern of conduct or series of acts over a period of time directed at a specific person which seriously alarms or annoys that person and would cause a reasonable person to suffer substantial emotional distress, and making a threat with the intent to place the person in imminent fear of death or bodily injury.

Larceny-Theft: The unlawful taking, carrying, leading, or riding away of property from the possession or constructive possession of another.

Simple Assault: An unlawful physical attack by one person upon another where neither the offender displays a weapon, nor the victim suffers obvious severe or aggravated bodily injury involving apparent broken bones, loss of teeth, possible internal injury, severe laceration, or loss of consciousness.

Intimidation: To unlawfully place another person in reasonable fear of bodily harm through the use of threatening words and/or other conduct, but without displaying a weapon or subjecting the victim to actual physical attack.

Vandalism: To willfully or maliciously destroy, damage, deface, or otherwise injure real or personal property without the consent of the owner or the person having custody or control of it.

Liquor Laws: The violation of state and/or local laws or ordinances prohibiting the manufacture, sale, purchase, transportation, possession or use of alcoholic beverages.

Drug Violations: The violation of laws prohibiting the production, distribution, and/or use of certain controlled substances and the equipment or devices used in their preparation and or use.

Weapons Law Violation: 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.

Bentley University will, upon written request, disclose to the alleged victim of a crime of violence or a non-forcible sex offense, the report on the results of any disciplinary proceeding conducted by the institution against a student who is the alleged perpetrator of such crime or offense. If the alleged victim is deceased as a result of such crime or offense, the next of kin of such victim shall be treated as the alleged victim for purposes of this paragraph.

Criminal Offenses 2015 to 2017

		CRIMINAL OFFENSES						
		ON CAMPUS						
Type Of Offense	Year	Non Residential Facility	Residential Facility	Total On Campus	Non Campus Building or Property	Public Property	Totals	Unfounded
MURDER/ NON-NEGLIGENT MANSLAUGHTER	2017	0	0	0	0	0	0	0
	2016	0	0	0	0	0	0	0
	2015	0	0	0	0	0	0	0
MANSLAUGHTER BY NEGLIGENCE	2017	0	0	0	0	0	0	0
	2016	0	0	0	0	0	0	0
	2015	0	0	0	0	0	0	0
Rape*	2017	1	5	6	0	0	6	0
	2016	1	1	2	0	0	2	0
	2015	0	8	8	0	0	8	0
Fondling	2017	0	0	0	0	0	0	0
	2016	0	0	0	0	0	0	0
	2015	1	0	1	0	0	1	0
Incest	2017	0	0	0	0	0	0	0
	2016	0	0	0	0	0	0	0
	2015	0	0	0	0	0	0	0
Statutory Rape	2017	0	0	0	0	0	0	0
	2016	0	0	0	0	0	0	0
	2015	1	0	1	0	0	1	0
Robbery	2017	0	0	0	0	0	0	0
	2016	0	0	0	0	0	0	0
	2015	0	0	0	0	0	0	0
Aggravated Assault	2017	0	0	0	0	0	0	0
	2016	1	0	1	0	0	1	0
	2015	2	0	2	0	0	2	0
Burglary	2017	0	4	4	0	0	4	0
	2016	3	7	10	0	0	10	1
	2015	3	12	15	0	0	15	0
Motor Vehicle Theft	2017	1	0	1	0	0	1	0
	2016	0	0	0	0	0	0	0
	2015	0	0	0	0	0	0	0
Arson	2017	0	2	2	0	0	2	0
	2016	0	3	3	0	0	3	0
	2015	0	2	2	0	0	2	0
Domestic Violence	2017	0	0	0	0	0	0	0
	2016	2	1	3	0	0	3	0
	2015	0	5	5	0	0	5	0
Dating Violence	2017	0	0	0	0	0	0	0
	2016	0	0	0	0	0	0	0
	2015	0	0	0	0	0	0	0
Stalking	2017	1	5	6	0	0	6	0
	2016	2	5	7	0	0	7	0
	2015	0	0	0	0	0	0	0

*Though not required to be reported, in the spirit of The Clery Act, we are disclosing that there was one additional rape reported in 2016. It occurred at a private residence near campus and involved two students.

Arrests and Referrals 2015 to 2017

		ARRESTS						
		ON CAMPUS						
Crime	Year	Non Residential Facility	Residential Facility	Total On Campus	Non Campus Building or Property	Public Property	Totals	Unfounded
LIQUOR LAW VIOLATION	2017	0	0	0	0	0	0	0
	2016	0	1	1	0	0	1	0
	2015	0	2	2	0	0	2	0
DRUG VIOLATION	2017	1	0	1	0	0	1	0
	2016	1	1	2	0	0	2	0
	2015	0	0	0	0	0	0	0
Weapon Violation	2017	0	0	0	0	0	0	0
	2016	1	0	1	0	0	1	0
	2015	0	0	0	0	0	0	0

		JUDICIAL REFERRALS						
		ON CAMPUS						
Crime	Year	Non Residential Facility	Residential Facility	Total On Campus	Non Campus Building or Property	Public Property	Totals	Unfounded
LIQUOR LAW VIOLATION	2017	15	271	286	0	0	286	0
	2016	20	218	238	0	1	239	0
	2015	34	344	378	0	0	378	0
DRUG VIOLATION**	2017	4	35	39	0	0	39	0
	2016	5	3	8	0	0	8	0
	2015	0	1	1	0	0	1	0
Weapon Violation	2017	1	1	2	0	0	2	0
	2016	0	2	2	0	0	2	0
	2015	0	1	1	0	0	1	0

Hate Crimes 2015 to 2017

2017

- 1 Simple Assault in Non-Residence, On Campus, bias Sexual Orientation
- 1 Larceny in Residence Hall, On Campus, bias Sexual Orientation

2016

- 1 Simple Assault in Residence Hall, On Campus, bias Sexual Orientation

2015

- 1 Vandalism in Residence Hall, On Campus, bias Religion
- 1 Intimidation in Residence Hall, On Campus, bias Sexual Orientation
- 1 Vandalism in Non-Residence, On Campus, bias National Origin

**MA laws written related to the de-criminalization of marijuana for those over 21 years of age resulted in reporting differences for 2017.

Procedures for Missing Students Residing on Campus

If a member of the university community has reason to believe that a student who resides in on-campus housing is missing, the Bentley University Police should be notified. The Bentley University Police will generate an incident report and initiate an investigation in order to attempt to locate the missing student using a wide range of electronic resources as well as making personal contact with friends, classmates, co-workers and relatives. If University Police determines that a student is missing and has been missing for more than 24 hours, the Waltham Police Department, the police department of the community where the missing student maintains a home of record, and the person designated as the student's missing student contact will be notified no later than 24 hours after the student is determined to have been missing for 24 hours. If the missing student is under the age of 18 and is not an emancipated individual, Bentley University will notify the student's parent or legal guardian immediately after University Police has determined that the student has been missing for more than 24 hours.

In addition to registering the name of a person as an emergency contact, students residing in on-campus housing have the option to identify an individual to be contacted by Bentley in the event the student is determined to be missing for more than 24 hours. If a student has identified such an individual, Bentley will notify that individual no later than 24 hours after the student is determined to have been missing for 24 hours. Students who wish to identify a contact for this purpose can do so through the semester housing check in process or by contacting the Residential Center. This contact information will be registered confidentially and will be accessible only to authorized campus officials and law enforcement and may not be disclosed outside of a missing person investigation.

Emergency Response and Evacuation Procedures

In the event of a serious incident or emergency which poses an immediate threat or danger to the health and safety of the Bentley community, Bentley University Police will send an emergency alert notification utilizing the Bentley Emergency Notification System. Based on the nature of the emergency, the responsibility for assessing the severity of the threat begins with the senior staff of University Police, Student Affairs, The Centers for Health, Counseling, and Wellness, Facilities Management and Risk Management. Once the threat is confirmed, the decision regarding emergency notification will be made by the Emergency Management Team, they will determine the content of the notification, and the notification

system will be activated, without delay, taking into account the safety of the community unless issuing a notification will, 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 notification system utilizes email, text messaging, telephone voice messaging, sirens, and classroom notifications to alert the community. Emergency messages are also posted on the home page of the Bentley website. Messages will be sent to all community members and will contain only a very brief description of the type of emergency along with instructions on keeping yourself protected. It is critical that you follow the instructions immediately. After the initial alert message, additional information may be distributed by means of another alert message, by email, or by web at bentley.edu and bentley.edu/emergency.

You must provide your contact information to be included in the emergency notification system. Members of the Bentley community are invited to provide or update their contact information at the beginning of each semester, or may update their contact information at any time by logging into MyBentley and clicking on the link titled “Update State or Federal Emergency Contact Information.”

A full-scale test of the Bentley emergency notification system is performed during the fall and spring semesters, and members of the Bentley community will be informed of at least one annual test date in advance by email. On some occasions, the test will be unannounced. Documentation of the tests performed, including a description of the exercise, the date and time, and whether it was announced or unannounced, is kept on file at the University Police Department.

In the event it becomes necessary to evacuate a building, the fire alarm system, or in some buildings a public announcement system, may be used to notify occupants. When the fire alarm sounds, building occupants should proceed quickly and calmly to the nearest exit, or follow the instructions provided over the announcement system. Always bring essentials with you such as a purse, keys, or jacket since you could be displaced from the building for an extended period of time. Do not use elevators. It is recommended that you familiarize yourself with two means of exit from areas where you routinely work, live or study. Remain outside the building until a public safety official authorizes reentry or directs you to an alternate location should the building need to be evacuated for an extended period of time.



ANNUAL FIRE SAFETY REPORT



Fire Safety in Residence Halls

The University through its Fire Safety Officer, administers a program of regular inspection, testing and maintenance of university premises to ensure compliance with applicable fire and life safety codes and standards. This includes conducting regular evacuation drills and offering a variety of educational and training programs in fire safety and prevention techniques for students, faculty and staff. All residence halls meet or exceed local and national fire safety codes and are equipped with modern fire detection, alarm and suppression systems.

Reporting a Fire

If you discover or suspect a fire, activate the nearest fire alarm pull station and leave the building or area immediately. To activate the fire alarm, you must both pull the tamper cover and pull the lever. After activating the alarm, call University Police at **781.891.3131** or go to the nearest emergency help telephone that is a safe distance from the fire source to be connected to University Police. Provide the dispatcher with the specific location of the fire and any other pertinent information.

Remember:

- Pulling the tamper cover to gain access to the fire alarm pull station will activate the tamper alarm only and will not report the alarm to University Police.
- After pulling the tamper cover, you must pull the lever on the fire alarm. By doing so, the building alarm will sound, alerting University Police and the Waltham Fire Department of the situation.

Fire Suppression Systems

All residence halls are equipped with automatic fire sprinkler systems. The system is comprised of sprinkler heads, associated piping, controls, and water under pressure. In the event of a fire, the sprinkler heads are designed to activate at a predetermined temperature. Do not hang items or material from the sprinkler head, as this may activate or interrupt the spray pattern

of the device. Do not tamper with any associated components of the water sprinkler fire suppression system.

Smoke Detectors

All residence halls are equipped with addressable fire alarm systems. When a device is activated or tampered with, a signal with the device location is sent to the fire alarm panel and to University Police. All detectors on campus are hard-wired to the main and backup electrical systems for their buildings. Tampering with a smoke detector is a violation of law and could result in an electrical shock.



There are two types of alarms: local and general. A local alarm rings the alarms in the apartment where a smoke detector is activated. A general alarm rings the alarms in the entire building. Both signals are received by University Police who investigate all fire alarm signals. A general alarm will cause a signal to transmit to the Waltham Fire Department.

Tampering with or damaging any fire safety systems is a serious offense and can result in criminal prosecution and/or university disciplinary action.

Apartments and Suites

Orchards, Rhodes, Fenway, Copleys, Forest, Kresge, Falcone Complex, and North Campus Apartments: Each bedroom and living room has a smoke detector. If one smoke detector is activated (causing a local alarm) the alarms in the apartment will ring and University Police will be notified. When the smoke condition clears, the alarm will silence by itself. If two smoke detectors are activated within an apartment or suite, the general alarm will ring for the building. This will cause University Police to respond along with the Waltham Fire Department.

The hallways are also equipped with smoke detectors. If one hallway or other common area (including lounges and study areas) is activated, the general alarm for the building will be activated.

Collins and Boylston: Each bedroom has a smoke detector. If one smoke detector is activated (causing a local alarm) the alarms in the apartment will ring and University Police will be notified. When the smoke condition clears,

the alarm will silence by itself. If two smoke detectors are activated within an apartment, the general alarm will ring for the building. This will cause University Police to respond immediately, followed by Waltham Fire Department.

A heat detector is located in each living room near the kitchen. They react to sudden and rapid changes in temperature over a specific time period or a high heat build-up. If this detector is activated, then the general alarm for the building will be activated and University Police will respond immediately.



The hallways are also equipped with smoke detectors. If one hallway or other common area (including lounges and study areas) is activated, the general alarm for the building will be activated.

Dormitories and Special Housing

Slade, Miller, Trees, Stratton, Cape and Castle: All bedrooms and common areas (lounges, hallways, and study areas) are equipped with smoke detectors. If one smoke detector is activated, the general alarm will ring for the building. This will cause University Police to respond immediately, followed by Waltham Fire Department.

Preventing Fires

Cooking: All cooking appliances, except microwave ovens, are prohibited from suites and dormitory rooms. This includes hotplates, hotpots, toaster ovens, popcorn poppers, and any other appliances whatsoever. Apartments may have cooking appliances in the kitchen only. Cooking is allowed only in apartments and residence hall kitchens. When cooking, remember the following:

- Keep ovens clean at all times.
- Turn on smoke exhaust fans when cooking
- Do not leave the oven or other heat-producing appliances unattended while they are in operation.

- Use only U.L. listed appliances.
- If a pan of grease or a deep-fat fryer catches on fire, immediately turn off the heat, cover the burning pan with a lid if possible and, if available, throw baking soda into the flame. Do not try to extinguish the fire with water, flour, sugar or other materials. Never try to carry a cooking utensil with burning liquid.
- Do not open the door of your apartment or residence hall kitchen to clear cooking smoke. Instead, open a window. Otherwise you will set off the hallway smoke detectors and create a false alarm.

Space Heaters: Space heaters are not allowed in any residence halls. In an emergency situation only, Facilities Management will provide an approved space heater for temporary heating purposes.

Additional Fire Prevention Guidelines

- Plug all types of multiple plug adapters directly into wall outlets. Do not use more than two extension cords in a single multiple-plug adapter. Check cords for wear and have faulty appliances repaired or removed from the residence.
- Halogen lamps and neon signs are prohibited, even if they are non-functional.
- Do not drape any type of combustible material over lamps or other electrical fixtures.
- Flammable and combustible liquids are prohibited in all residence halls. This includes charcoal briquettes, lighter fluids, gasoline, benzene, propane, alcohol, cleaning fluids, oil-based paints and thinners.
- Do not use flammable decorations at any time, including during the holiday season. Live trees or combustible ornaments are not permitted. This includes cardboard cut-outs from boxes.
- Combustible waste should be disposed of as soon as possible. Trash and garbage should be emptied in the proper refuse containers, not left in corridors or hallways since this may obstruct building egress. Limit room trash collection to a maximum of one 12-pack sized box of mixed recyclables and two kitchen-size trash bags or one large trash bag. Accumulations larger than this are not allowed.
- All types of open flames including candles and incense are strictly prohibited in all campus buildings.

- Do not hang any items from the ceiling as they may interfere with the designed spray pattern of the sprinkler system or the path of heat and smoke to a fire detection device.
- Room furnishings should not obstruct or hamper any access to an exit. All doors must be able to swing freely in their full range of motion.
- Do not prop open fire doors. Closed fire doors are designed to prevent smoke and fire from spreading.
- Bicycles chained to stairways or landings are prohibited and will be removed.
- Motorcycles, mopeds, gasoline engines, engine parts or any flammable fuels are prohibited in all campus buildings.

Smoking Policy

Smoking (including cigarettes, cigars, pipes, e-cigarettes, and any other smoke-producing tobacco products) is prohibited on all properties owned or leased by Bentley. This policy applies to students, faculty, staff, guests, visitors, and contractors. Campus property includes (but is not limited to): all interior space on campus and property leased by the university, all outside property or grounds including walkways, breezeways, patios, and parking lots — including vehicles, all outside property leased by the university, all vehicles leased or owned by the university and all indoor and outdoor athletic facilities.

Escaping From a Fire

When the fire alarm sounds, prepare to exit immediately. Touch your door to test its temperature. If it is hot, put towels or clothing around the door frame to prevent smoke from entering. Open your window and wave something white to attract attention.

If the door is cool, evacuate your room as soon as possible. Go to the nearest exit. **DO NOT WAIT** for a staff person to tell you to leave. It is your responsibility to evacuate the building in a quick and orderly fashion! If there is smoke in the hall, stay low and proceed to the nearest exit. There are two exits on every floor. Do not panic if one of the exits is blocked, proceed to the next one.

- Stay calm. Do not run or shout.
- Do not use an elevator. In the event that you are in an elevator when the alarm sounds, it will bring you to the main floor.

It is essential to determine which residents have safely escaped. You should assemble in designated spot for the building you are evacuating from. Evacuation locations are noted on the map at the end of this section. Do not attempt to re-enter the building until the Fire Department or University Police has declared the emergency over.

Fire Drills

Fire drills are conducted each semester to familiarize everyone with the sound of the alarms, building evacuation routes and designated gathering spots outside the building. Use the emergency exit locations to evacuate the building safely. Failure to evacuate when the fire alarm sounds is not only dangerous but punishable by a fine and/or other disciplinary action.

Fire extinguishers are located in all campus buildings. These are to be used only for their intended purpose, and should not be removed at any other time. Extinguishers are to be used only by trained personnel.

Fire Safety Education and Training

A fire safety education program is presented during the first week of classes for all incoming first-year resident students. Attendance at this presentation is mandatory. Procedures to follow in the event of a fire alarm are reviewed, as well as the fire safety policies that are in effect in the residence halls.

Plans for Future Improvements in Fire Safety

Bentley University intends to remain on task with regard to its prevention strategies (education, inspections, fire drills and device maintenance), and will continue to upgrade fire alarm systems throughout the campus. A deferred maintenance program replaces or upgrades existing fire alarm systems that are approaching their service life expectancy. Whenever buildings undergo major renovations, the life safety systems, fire detection and fire suppression systems are replaced with current code compliant systems.

Bentley University Annual Fire Report 2015 to 2017

Residential building name	Total fires in building			Fire Number			Date of Fire			Time of Fire			Category		
	2015	2016	2017	2015	2016	2017	2015	2016	2017	2015	2016	2017	2015	2016	2017
Alder Hall 385 Beaver St	1			1			4/5/15			0100			Intentional		
Birch Hall 385 Beaver St															
Boylston A 385 Beaver St															
Boylston B 385 Beaver St															
Cape House 500 Beaver St															
Castle House 500 Beaver St															
Cedar Hall 385 Beaver St			1			1			2/25/17		0106				Intentional
Collins Hall 385 Beaver St	1		1	1		1	11/4/15		12/10/17	1844	1524		Unintentional		Unintentional
Copley North 500 Beaver St															
Copley South 500 Beaver St															
Elm Hall 385 Beaver St		1				1		2/7/16		0100				Intentional	
Falcone East 385 Beaver St															
Falcone North 385 Beaver St															
Falcone West 385 Beaver St															
Fenway Apts. 500 Beaver St	2			1			1/11/15			1428			Intentional		
Fenway Apts. 500 Beaver St				2			10/13/15			2151			Unintentional		
Forest Hall 385 Beaver St			1			1			4/18/17		0252				Unintentional
Kresge Hall 385 Beaver St			1			1			9/14/17		0009				Intentional
Maple Hall 385 Beaver St		1				1		1/22/16		2300				Intentional	
Miller Hall 385 Beaver St		1				1		4/26/16		2000				Intentional	
North Campus A 371 Beaver St															
North Campus B 371 Forest St		1				1		10/30/16		0320				Unintentional	
North Campus C 371 Forest St															
North Campus D 371 Forest St															
Oak Hall 385 Beaver St															
Orchard North 500 Beaver St	1			1			4/19/15			1153			Unintentional		
Orchard South 500 Beaver St															
Rhodes Hall 385 Beaver St															
Slade Hall 385 Beaver St															
Spruce Hall 385 Beaver St															
Stratton House 357 Beaver St															
TOTALS	5	4	4												

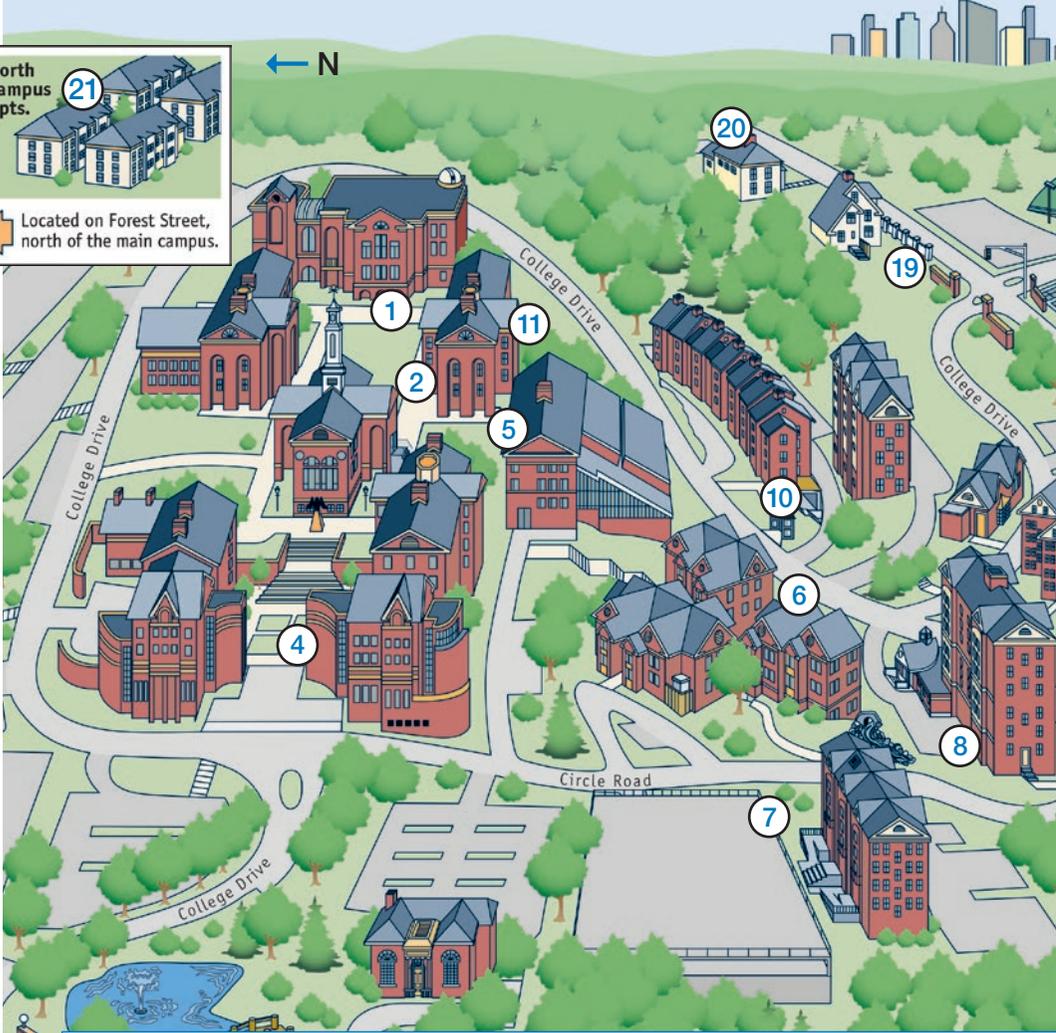
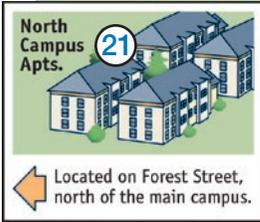
Cause of Fire			Number of Injuries Requiring Treatment at Medical Facility			Number of Deaths			Value of Property Damage Caused by Fire			Case Number		
2015	2016	2017	2015	2016	2017	2015	2016	2017	2015	2016	2017	2015	2016	2017
Open Flames			0			0			\$0			15-00209		
		Open Flames			0			0			\$0			17-00130
Cooking		Cooking	0		0	0		0	\$2,369		\$0	15-00700		17-00712
	Open Flames			0				0			\$0			16-00097
Open Flames			0			0			\$0			15-00004		
Open Flames			0			0			\$0			15-00554		
		Smoking Materials			0			0			\$0			17-00262
		Open Flames			0			0			\$0			17-00460
	Open Flames			0				0			\$1,268			16-00035
	Open Flames			0				0			\$0			16-00290
	Cooking			0				0			\$197			16-00642
Cooking			0			0			\$0			15-00258		
			0	0	0	0	0	0	\$2,369	\$1,465	\$0			

Bentley University Fire Safety System 2015 to 2017

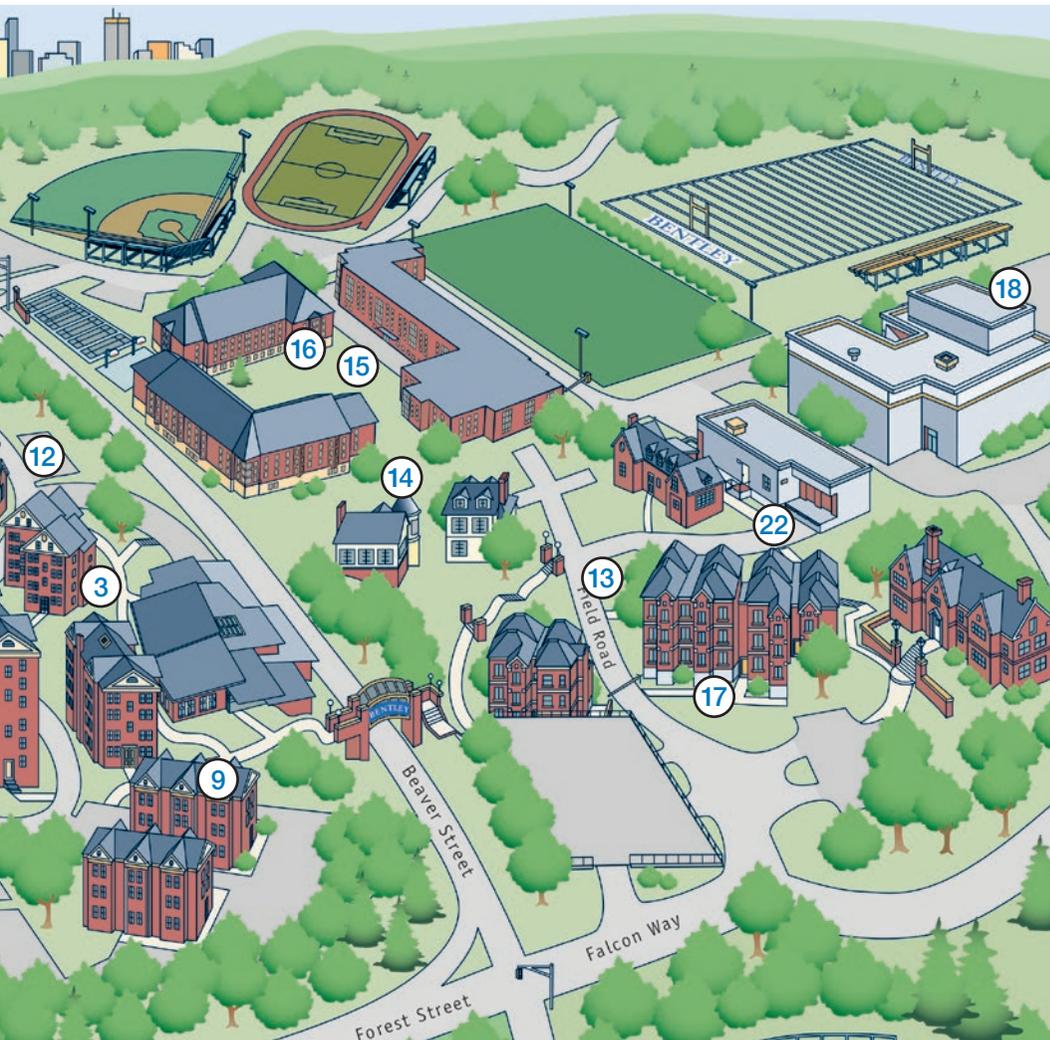
Residential Building Name	Fire Alarm Device on Site Monitored by Bentley Police	Full Sprinkler	Smoke Detectors in Bedrooms	Attic Heat Detectors (N/A if no Attic)	Number of Evacuation Test/Drills 2017
Alder Hall	X	X	X	X	2
Birch Hall	X	X	X	X	2
Boylston A	X	X	X	X	2
Boylston B	X	X	X	X	2
Cape House	X	X	X	N/A	2
Castle House	X	X	X	N/A	2
Cedar Hall	X	X	X	X	2
Collins Hall	X	X	X	X	2
Copley North	X	X	X	X	2
Copley South	X	X	X	X	2
Elm Hall	X	X	X	X	2
Falcone East	X	X	X	X	2
Falcone North	X	X	X	X	2
Falcone West	X	X	X	X	2
Fenway Apts.	X	X	X	N/A	2
Forest Hall	X	X	X	X	2
Kresge Hall	X	X	X	X	2
Maple Hall	X	X	X	X	2
Miller Hall	X	X	X	X	2
North Campus A	X	X	X	X	2
North Campus B	X	X	X	X	2
North Campus C	X	X	X	X	2
North Campus D	X	X	X	X	2
Oak Hall	X	X	X	X	2
Orchard North	X	X	X	X	2
Orchard South	X	X	X	X	2
Rhodes Hall	X	X	X	X	2
Slade Hall	X	X	X	X	2
Spruce Hall	X	X	X	X	2
Stratton House	X	X	X	N/A	2



Evacuation Meeting Areas



NO. Evacuating Building	Evacuation Meeting Area	NO. Evacuating Building
1 Library	West porch of Adaman Academic Center	9 Kresge Hall
1 Morison Hall	West porch of Adaman Academic Center	9 Student Center
2 Adaman Academic Center	East porch of Baker Library	10 Slade Hall
3 Boylston Apartments	North entrance to Student Center	10 Tree Dormitories
3 Rhodes Hall	North entrance to Student Center	11 Lindsay Hall
4 Jennison Hall	LaCava Quad leading up to Library	12 University Police
4 LaCava Center	LaCava Quad leading up to Library	13 Orchard North
4 Rauch Building	LaCava Quad leading up to Library	13 Orchard South
5 Smith Technology Center	West porch of Lindsay	14 Cape and Castle Houses
6 Falcone Apartments	Greenspace	15 Copley North
7 Miller Hall	East side of north parking lot by parking deck	
8 Collins Hall	BBQ area at north side of Collins	
9 Forest Hall	Pedestrian walk intersection at Rhodes/Student Center/Kresge	



Evacuation Meeting Area

- Pedestrian walk intersection at Rhodes/Student Center/Kresge
- Pedestrian walk intersection at Rhodes/Student Center/Kresge
- Lawn /bus stop at Circle Road by the Tree Dorms
- Lawn /bus stop at Circle Road by the Tree Dorms
- South side of rear parking lot
- Side of CP parking lot across from dispatch
- Lower Campus Greenspace
- Lower Campus Greenspace
- Lawn by entrance to Copley Circle
- North entrance of Fenway Hall

NO. Evacuating Building

- 15 Copley South
- 16 Fenway Hall
- 17 Lewis Hall
- 18 Dana Athletic Center
- 19 Stratton House
- 20 Harrington House
- 21 North Campus A
- 21 North Campus B
- 21 North Campus C
- 21 North Campus D
- 22 Dove Cote
- 22 Maintenance Building

Evacuation Meeting Area

- North entrance of Fenway Hall
- Main entrance to Copley South
- BBQ area at east side of Orchard South
- South side of parking lot
- South side of parking lot
- West parking area
- Center BBQ area of North Campus
- South entrance to Orchard South
- South entrance to Orchard South

TITLE IX AND GENDER-BASED DISCRIMINATION POLICY

Mission of Bentley University: To educate creative, ethical, and socially responsible organizational leaders by creating and disseminating impactful knowledge within and across business and the arts and sciences.

Mission and Purpose of this Policy: To eliminate barriers on Bentley University’s campus that are rooted in harassment or discrimination based on an individual’s sex, gender, sexual orientation, gender identity, and/or gender expression. This policy may be edited as needed to comply with federal laws and guidelines. The most up-to-date policy can be found at www.bentley.edu/titleix.

Questions Regarding this Policy: Please forward any questions to those responsible for Bentley’s Title IX compliance:

Erin Kelley Title IX Coordinator/Director of Student Conduct and Development Student Center 320 781.891.2329	Alex Hirs Deputy Title IX Coordinator for Student Support/Assistant Director of Gender Equity and Development Student Center 320 781.891.2364	Ann Dexter Deputy Title IX Coordinator for Faculty/Staff Support and Associate Vice President, Human Resources Rauch 201 781.891.3427
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1. Policy Statement

Bentley University will always respond to complaints, reports, allegations, and information about sex- and gender- based discrimination that it knows or should know about. These responses will serve to stop prohibited conduct, prevent its recurrence, and address any lingering impact that it had on both individuals and the larger campus community.

Congress passed the Higher Education Amendments in 1972, and included within them was Title IX, which states:

“No person in the United States shall, on the basis of sex, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any education program or activity receiving Federal financial assistance...”

Since 1972, several other federal and Massachusetts state laws have been adopted to offer further protection to those in higher education (i.e., students, staff, faculty, and third parties) from discrimination and harassment based on a person’s sex or gender. Bentley University is firmly committed to establishing an environment free of such discrimination

and prohibits such acts, including: sexual harassment, sexual exploitation, sexual harassment including sexual violence (i.e., sexual assault and non-consensual sexual touching, forcible or not), relationship abuse (including domestic violence and dating violence), voyeurism, and stalking.

Additionally, retaliation against anyone who reports an incident of harassment or discrimination listed above, brings forward a complaint, or participates in an investigation of harassment or discrimination is also prohibited. Retaliation is also prohibited against those who, in good faith and reasonable manner, oppose an act or policy believed to constitute sex- or gender-based discrimination. It is the responsibility of Bentley University's Title IX Coordinator to ensure that inquiries into reports of misconduct described above are made, as well as formal investigations consistent with applicable grievance procedures that are described in the following policy.

Bentley also reaffirms the rights of reporting parties (see section **9. *Additional Provisions, Definitions, and Clarifications*** for a full list of definitions) to decide whether they wish to be involved in any of the University's processes to address sex- and gender-based harassment or discrimination.

Bentley is also strongly committed to supporting reporting parties through the numerous support services available. The University encourages those who wish to receive confidential support services regarding sex- and gender-based discrimination to seek assistance from staff in the Counseling Center, the Health Center, the Boston Area Rape Crisis Center, REACH Beyond Domestic Violence, and/or seek medical attention.

Responsible employees of the University are required by law to report allegations of sexual harassment and other forms of sex- and gender-based discrimination that they observe or learn about to the Title IX Coordinator. Employees whose positions legally require confidentiality (i.e., licensed mental health counselors and health professionals) are not responsible employees. To review the full list of employee designations under Title IX at Bentley University, please refer to **Appendix C**. If you have a question regarding reporting responsibilities, please contact the Title IX Coordinator.

All employees of Bentley University are strongly encouraged to offer information on how to report such incidents to students and colleagues, as well as report this conduct directly to the Title IX coordinator. Responsible employees who fail to report allegations of sexual harassment and other forms sexual misconduct that they observe or learn about may be subject to disciplinary action. Bentley University is mandated to respond promptly and appropriately to any allegations of sexual harassment or

other forms of gender-based discrimination. Under these policies, the university will consider the effects of off-campus conduct for faculty, staff, students, visitors, and community members when evaluating whether a hostile environment was created on campus. Any person responsible for, or involved in, retaliation will be subject to disciplinary action up to and including expulsion or termination.

Additionally, Bentley seeks to ensure that our campus and culture are inclusive for all students, and, as such, has committed to engaging in several preventative and proactive educational programs and initiatives.

For a list of some of the programs Bentley offers, please see section **12. Prevention and Education**.

2. Resources for Information and Assistance

Bentley University offers various resources for students, staff, and faculty seeking information or support regarding gender-based discrimination and harassment. Bentley also acknowledges that each person experiences and responds in differing ways, and there are a variety of formal and informal options for support. Please review the information regarding your options for support, assistance, and reporting so that you can make an informed decision based on personal needs. Your needs may change over time, so please also know that you may choose to utilize different forms of response at different times.

Any member of the Bentley community (including visitors) is welcome to contact the Title IX coordinator for information regarding this policy or the procedures outlined within it. The resources highlighted in **Appendix A** also provide information, assistance, and support to those who seek it.

3. Title IX at Bentley

Bentley University will always respond to reports, allegations, and information about sex- and gender-based discrimination that it knows or should know about. The Title IX Coordinator for Bentley University is responsible for providing leadership regarding the Title IX and Gender-Based Discrimination Policy, ensuring that ongoing trainings and education regarding sex/gender-based harassment and discrimination take place, as well as compliance- related reporting.

Additionally the Title IX coordinator will be responsible for:

- Tracking and monitoring incidents, including sex-based discrimination and sexual misconduct
- Ensuring that the University responds effectively to each report

After a formal report is submitted, the Title IX Coordinator will ensure that the appropriate measures are taken, including obtaining an external investigator and convening a Title IX Panel, however the Title IX coordinator will not participate in the investigation, Title IX Panel, or in the deliberations regarding the report (see **section 11** for more information on investigation procedures and protocols).

Bentley University also has two Deputy Title IX Coordinators, one focused on supporting students and another focused on supporting staff and faculty. These individuals can offer further information to those who may have questions about this policy, and formal reports can be submitted to them. The Deputy Title IX coordinators will also keep individuals involved in formal investigations up-to-date regarding its progress. The Deputy Title IX coordinators will not participate in the investigation, Title IX Panel, or in the deliberations regarding the report (see **section 11** for more information on investigation procedures and protocols).

The Title IX Coordinator and Deputy Title IX Coordinators are knowledgeable about, and will provide information on, all options for report resolution. Both the Title IX Coordinator and the Deputy Title IX Coordinators can assist in providing interim support measures to remedy the impact of an incident.

4. Interim Support Measures

One way in which Bentley will support those who bring forward claims of sex- or gender-based discrimination is to offer interim measures and supports to remedy to the impact of the alleged misconduct. Examples of interim measures include:

- Providing University “No Contact” orders to all parties involved
- Changes in housing assignment or room combination
- Assistance from support staff
- Academic support services
- Help in rescheduling exams
- Limiting access to university facilities and activities pending resolution of the matter
- Change in class schedule
- Change in work schedule or job assignment
- Arrangements for medical services

These are just some examples of the interim support measures that the University may take to support individuals involved in an incident of sexual misconduct. As each individual will have their own needs and requests, the University is committed to tailoring interim measures to the specifics of each incident in a fair and equitable manner. Individuals seeking to access interim support measures can contact the Title IX Coordinator or the Deputy Title IX Coordinators.

5. Scope of this Policy

The federal mandates established by Title IX and the Campus SaVE Act reaffirm that students, staff, faculty, and visitors have the right to be free from discrimination based on their gender, sex, sexual orientation, and gender appearance/expression. All procedures regarding incidents involving students can be found in **Appendix B** of this policy, while all procedures for incidents involving staff and faculty can be attained by contacting the Deputy Title IX Coordinator for Faculty and Staff Support.

This policy applies to any behaviors involving community members both on and off campus. Examples of off campus coverage of this policy include incidents that occur on faculty-led study abroad trips, the Commencement Week trip for graduating seniors, internship sites, service learning sites, and off campus residences of students.

6. Confidentiality

Bentley encourages reporting parties to talk to an employee about incidents of sexual misconduct and seek out appropriate resources and support. Please note that faculty and staff members on campus have different roles and responsibilities for reporting information should a student disclose an act of sexual misconduct:

- Some employees (called confidential employees) may talk to a student in confidence, and generally only report to the University that an incident occurred without revealing any personally identifying information. Disclosures to these employees will not trigger an investigation into an incident against the student's wishes.
- Certain employees (called responsible employees) are required to report all the details of an incident (including the identities of both the reporting and responding parties) to the Title IX coordinator. A report to responsible employees constitutes a report to Bentley and generally obligates the University to investigate the incident and take appropriate steps to address the situation.

This policy is intended to make students aware of the various reporting and confidential disclosure options available to them. Ideally this information will inform students so they can make deliberate choices about where to turn should they experience gender-based harassment and/or sexual misconduct. Bentley encourages students to talk to someone identified in one or more of these groups. For more information on which employees serve in each of these capacities, please see *Appendix C*.

7. Options for Assistance

By federal law, a person with a disability is any person who: 1) has a physical or mental impairment; 2) has a record of such impairment; or 3) is regarded as having such an impairment, which substantially limits one or more major life activities such as self-care, walking, seeing, hearing, speaking, breathing, or learning. A student requesting an accommodation in regard to a Title IX investigation/adjudication process must follow the appropriate process for requesting an accommodation through the Office of Disability Services (located in Jennison Hall). Additionally, the Office of Disability Services can provide students with a comprehensive list of off-campus resources.

The Office of Disability Services will make a determination regarding the request and notify the appropriate parties. Reasonable accommodations depend upon the nature and degree of severity of the documented disability. While the Americans with Disabilities Act of 1990 requires that priority consideration be given to the specific methods requested by the student, it does not imply that a particular accommodation must be granted if it is deemed not reasonable and other suitable techniques are available.

For more information regarding options for assistance, regarding both immediate and ongoing concerns, please see *Appendix A*.

8. Defining and Recognizing Prohibited Conduct

Conduct that is prohibited and encompassed by this policy includes sexual harassment, sex and gender discrimination, sexual assault, rape, stalking, and relationship abuse (including domestic and dating violence). It is a violation of this policy to either commit these acts or attempt to commit them. These acts are also a violation of federal and state law (including Title IX, the Campus SaVE Act, and the Violence Against Women Act). These acts are prohibited in any sex or gender configuration (i.e., between the same or differing genders), regardless of sex and gender identity. Individuals found responsible for violating these policies will face sanctions that are commensurate with the severity of the policy violation, ranging from

probation through expulsion. Acts of harassment or sex- and gender-based discrimination may vary in severity and include, but are not limited to, the following categories:

- Sexual Assault
- Sexual Exploitation
- Sexual Harassment
- Harassment Based on Sexual Orientation, Gender, or Gender Identity
- Hostile Environment
- Stalking
- Relationship Abuse
- Retaliation
- Complicity

Bentley University's Definition of Consent applies to all of these acts. Bentley University adheres to the following definition of consent:

- Consent is a clear, active, and affirmative permission to act. The person who initiates sexual activity is responsible for obtaining the other person's consent for that activity each and every time. The existence of a dating relationship does not imply consent, and even once consent has been given, it can be withdrawn at any time.
- Consent can never be assumed or implied. The absence of "No" or silence does not mean that consent has been given. Additionally, consent to one form of sexual activity does not imply consent to other forms of sexual activity. Consent is not present when coercion, manipulation, intimidation, or force is used. Coercion includes continued pressure after an individual has made it clear that they do not want to engage in the behavior. Coercive behavior differs from seductive behavior based on the type of pressure someone uses to get consent from another. When someone makes clear to you that they want to stop, or that they do not want to go past a certain point of sexual interaction, continued pressure beyond that point can be coercive.
- Consent is not present when an individual is incapacitated. An incapacitated individual is someone who cannot make rational, reasonable decisions because they lack the capacity to understand the "who, what, when, where, why, or how" of a sexual interaction. This includes a person whose incapacity results from mental disability, sleep,

involuntary physical restraint, unconsciousness, or use of alcohol or other drugs. Incapacitation is a state beyond drunkenness or intoxication. A person is not necessarily incapacitated merely as a result of drinking or using drugs. The impact of alcohol and other drugs varies from person to person, and if there is any doubt as to the level or extent of the other person's intoxication or impairment, the prudent course of action is to forgo or cease any sexual contact or activity.

In evaluating consent in cases of alleged incapacitation, the University asks two questions:

1) *Did the person initiating sexual activity know that the other party was incapacitated?, and if not,*

2) *Should a sober, reasonable person in the same situation have known that the other party was incapacitated? If the answer to either of these questions is "Yes," consent was absent and the conduct is likely a violation of this policy.*

- Consent is never present if an individual is under the legal age of consent (16 in the state of Massachusetts).

Sexual Assault

Sexual assault is a form of sexual misconduct that is a violation of University policy as well as federal and state statutes. The Commonwealth of Massachusetts defines sexual assault as "any sexual activity that is forced, coerced, or unwanted" and refers to the crimes of rape and indecent assault and battery. Bentley University adheres to the following definitions of rape and indecent assault and battery:

- Rape includes penetration (oral, anal, or vaginal) of any orifice with any object without effective consent.
- Indecent Assault and Battery includes non-consensual sexual contact without penetration.

The severity of the crime is the same whether the responding party is a stranger or known to the reporting party.

All students, faculty, and staff should be aware that the University is prepared to respond to any incidents of sexual assault. Individuals who commit sexual assaults will be subject to disciplinary action that can include suspension or expulsion from Bentley as well as civil and criminal penalties.

Sexual Exploitation

Sexual exploitation occurs when a person takes non-consensual, unjust, or abusive sexual advantage of another for their own advantage or benefit, or for the benefit or advantage of anyone other than the one being exploited. This behavior may not fall within the definition of non-consensual sexual contact/activity, or sexual harassment, but it is still a violation of policy.

There are many degrees and types of sexual exploitation including, but not limited to:

- **Photographing or Video/Audio Taping Sexual Contact or Activity**

Photographing or taping someone (via audio or video) involved in sexual activity, or in a state of undress without their consent or knowledge constitutes prohibited sexual exploitation. Even if a person consented to the sexual activity or intercourse, photographing or taping someone without their knowledge goes beyond the boundaries of that consent.

- **Disseminating Photographs or Video/Audio Tapes of Sexual Contact or Activity**

The dissemination of photographs or video/audio of someone involved in sexual activity, or in a state of undress without their knowledge or consent constitutes a separate and additional act prohibited by this policy.

- **Voyeurism**

Voyeurism is the act of observing a person involved in sexual contact/activity, or in a state of undress without their knowledge or consent.

- **Inducing Intoxication/Incapacitation for the Purpose of Sexual Activity**

Offering drugs, alcohol, or other substances to a person with or without their knowledge with the intent to impair their ability to withhold consent or their ability to knowingly consent to sexual activity is a violation of this policy. This type of conduct constitutes sexual exploitation regardless of whether any sexual activity takes place.

Sexual Harassment

Bentley University adheres to the following definition of sexual harassment:

- Unwanted sexual advances that may take the form of inappropriate sexual or suggestive comments, sounds or jokes; unsolicited touching or fondling; unwanted intercourse or assault;
- Unwelcome requests for sexual favors; and/or
- Other behavior of a sexual nature where:

- Submission to such conduct is made either explicitly or implicitly as a term or condition of an individual's employment or participation in a university-sponsored educational program or activity. Submission to or rejection of such conduct by an individual is used as the basis for academic or employment decisions affecting that individual (often referred to as quid pro quo harassment); or
- Such conduct has the purpose or effect of unreasonably interfering with an individual's academic or work performance, as well as creating an intimidating or offensive educational, social, living, or working environment.

Harassment Based on Sexual Orientation, Gender, or Gender Identity

Harassment based on sexual orientation, gender, or gender identity is defined as derogatory comments, actions, or conduct that may include acts of verbal, nonverbal, cyber, or physical aggression, intimidation, or hostility, even if those acts do not involve conduct of a sexual nature. Such conduct is directed toward an individual by virtue of their actual or presumed sexual orientation, gender, or gender identity and:

- Humiliates or intimidates an individual;
- Impedes academic or work performance; and/or
- Interferes with university life.

Hostile Environment

Hostile environment may be created by harassing conduct that is sufficiently severe, persistent, or pervasive, and objectively offensive. Such conduct denies, limits, or interferes with the ability to participate in, or benefit from:

- Educational programs, services, opportunities, or activities; or
- Employment access, benefits, or opportunities.

Stalking

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

Stalking can occur between strangers, individuals who know each other, or individuals who are or were previously in a relationship. Stalking

behaviors may include unwanted following or watching, unwelcome gifts, or communications in person, in writing, or through the use of technology. It also includes accessing personal information to monitor a person's activity. Individuals found responsible for instances of stalking will be subject to disciplinary action that can range from education to expulsion.

Relationship Abuse

Relationship abuse can be physical, sexual, verbal, emotional, financial, or digital. It is unwanted and causes physical or emotional harm. At Bentley, relationship abuse encompasses dating violence and domestic violence and can involve current or former intimate partners, spouses, or dating relationships. Relationship violence occurs in both same-sex and opposite-sex relationships. All students, faculty, and staff should be aware that the university is prepared to respond to any incidents of relationship abuse. Individuals found responsible for instances of relationship abuse will be subject to disciplinary action that can range from education to expulsion.

Examples of relationship abuse include, but are not limited to:

- **Physical abuse:** hitting, slapping, shoving, grabbing, pinching, biting, hair pulling, or throwing objects at a person.
- **Sexual abuse:** attacks on sexual parts of the body, forcing sex after physical violence, treating one in a sexually demeaning manner, coercing or attempting to coerce any sexual contact or behavior without consent, or marital rape.
- **Psychological or emotional abuse:** a pattern of behavior undermining a person's sense of self-worth or self-esteem, constant criticism, possessiveness, damaging possessions, threats, intimidation, diminishing a person's abilities, name-calling, public humiliation, and damaging a person's relationship with their friends or family.
- **Financial abuse:** Taking money from or prohibiting access to bank accounts.
- **Digital abuse:** Controlling social media accounts, or harassment through social media or other forms of technology.

Retaliation

Retaliation occurs when an adverse action is taken against an individual for raising concerns about conduct which is prohibited by law or policy. All members of the Bentley community have the right to raise concerns or file

a complaint through the student conduct system without fear of retaliation. Additionally, it is both unlawful and a violation of University policy to retaliate against an individual for filing a report of sexual misconduct or gender-based discrimination. Retaliation is also prohibited against anyone who participates in an investigation of sexual misconduct or gender-based discrimination. Examples of retaliation can include hostility, intimidation, threats, exclusion, or discrimination. Any person who retaliates against an individual reporting sexual misconduct or gender-based discrimination and/or someone who participates in a sexual misconduct or gender-based discrimination investigation is subject to disciplinary action up to and including expulsion from the University.

Complicity

Complicity is any act taken with the purpose of aiding, facilitating, promoting, or encouraging the commission of an act of prohibited conduct by another person.

9. Additional Provisions, Definitions, and Clarifications

- **Leniency:** Students may be concerned about reporting sexual misconduct believing that their own behavior might subject them to disciplinary action (e.g., a reporting party or witness is underage and was using alcohol or drugs at the time of the incident). Witnesses and reporting parties should be assured that the focus in matters of sexual misconduct is always on the reported behavior, not on whether someone was, for example, using alcohol or drugs at the time. Individuals are encouraged to come forward and report such conduct regardless of the surrounding circumstances.

In situations involving allegations of sexual misconduct, Bentley University will seek to make the sexual misconduct allegation the primary focus of any investigation or disciplinary action. In such circumstances, the University will exercise leniency regarding secondary conduct violations (e.g. underage drinking) and those issues will not be subjected to adjudication. It should be noted that the use of alcohol or drugs does not excuse sexual misconduct and a person who has been incapacitated through the use of alcohol or drugs (or by any other means) cannot give effective consent to sexual activity.

- **Confidentiality:** Because breaches of confidentiality compromise the ability of the University to investigate and resolve claims of prohibited harassment and discrimination, the Title IX Coordinators will attempt to

protect the confidentiality of harassment and discrimination proceedings to the extent reasonably possible.

On campus, complete confidentiality can only be guaranteed when a concern is shared with a clinician in the Health Center, any staff within the Counseling Center, and with certain Spiritual Life Staff, and when the concern does not involve a continuing threat of serious harm to self or others.

A list of confidential resources on and off campus is available in **Appendix A**. The University is obligated to investigate all allegations that may constitute harassment or discrimination. Any person seeking information or guidance concerning potential harassment or discrimination should be advised that the University may need to take action once informed of an allegation whether or not the person wants to pursue a complaint.

- **Academic Freedom and Harassment:** Bentley University is committed to principles of free speech and upholding the tradition of academic freedom. This policy is not intended to restrict teaching methods or freedom of expression, nor will it be permitted to do so. Harassment or discrimination prohibited by this policy is not a proper exercise of academic freedom.
- **Use of Alcohol or Drugs:** A person who has consumed alcohol and/or drugs still has a responsibility to obtain ongoing consent for any sexual activity with another person. The use of alcohol or other drugs by the person initiating sexual activity will never be accepted as excuse for failing to obtain consent. Please see Bentley's definition of Consent, in section **8. Defining and Recognizing Prohibited Conduct** of this document, for more information.
- **Reporting Party:** An individual bringing forth a report that they have experienced one or more acts of sexual misconduct described in this policy.
- **Responding Party:** An individual who is alleged to have carried out one or more of the prohibited acts defined in this policy.

10. Reporting an Incident

Individuals (including third parties) may choose to seek action or assistance both on campus as well as through the surrounding community. Additional or interim measures may be provided to you to remedy the impact of the alleged misconduct. The following situations are example of reasons why

you might choose to report an incident of misconduct:

- To seek formal action against someone, such as removing them from a class or campus
- To educate the person about their behavior through use of the University's Title IX processes and procedures
- To make Bentley aware of the behavior in case it is part of a larger pattern
- To help prevent similar incidents happening again in the future
- To confront the individual and make your voice heard about how you feel about what happened
- To receive assistance in changing classes or other on campus arrangements
- To receive support in coping with an incident

Reporting Confidentially

If you are seeking support but want to maintain confidentiality, the best on campus resources for you include the clinicians in the Health Center, any staff in the Counseling Center, or any ordained ministers on the Spiritual Life staff. All of these resources are included in the cost of attendance for students, and the clinicians in the Health Center and Counseling Center staff can be seen on an emergency basis. The off campus resources listed on our website are also confidential resources. You may consider a confidential option if you:

- Would like to know about support and assistance but are not sure if you want to pursue formal action against the individual;
- Have questions or would like to process what happened with someone without involving police or Title IX procedures; and/or
- Do not want the responding party (i.e., alleged violator) to know that you are seeking help or support

Please Note: Please be aware that confidential resources have some obligations to report, notably when the individual is in imminent danger or posing an imminent danger to others. There are also obligations to report situations involving the abuse of a minor.

Informal Resolution

Individuals may seek an informal resolution in place of a formal report

and investigation. The University, however, has the discretion to determine whether the nature of the reported conduct is appropriate for an informal resolution, to determine the type of informal resolution that may be appropriate in a specific case, and to refer a report for formal investigation at any time.

Forms of informal resolution that involve face-to-face meetings between the reporting and the responding parties, such as mediation, are not available in cases involving sexual assault. Participation in an informal resolution process is voluntary. The University will not compel a reporting or responding party to engage in an informal resolution, will not compel a reporting party to directly confront the responding party, and will allow a reporting or responding party to withdraw from the informal resolution process at any time. The University may decline the request for informal resolution in any particular case and may terminate an ongoing informal resolution process at any time. Pursuing an informal resolution does not preclude later use of a formal investigation if the informal resolution fails to achieve a resolution acceptable to the parties and the University. When the reporting or the responding parties withdraws from an informal resolution process, or when an informal resolution is otherwise terminated for any reason, any statements or disclosures made by the parties during the course of the informal resolution may be considered in a subsequent formal investigation.

With any informal resolution, each party has the right to choose and consult with a support person. The support person may be any person, including an attorney, who is not otherwise a party or witness to the reported incident(s). The parties may be accompanied by their respective support persons at any meeting or proceeding held as part of the informal resolution. While the support persons may provide support and advice to the parties at any meeting and/or proceeding, they may not speak on behalf of the parties or otherwise participate in, or in any manner disrupt, such meetings and/or proceedings.

Informal resolutions may include:

- **Resolution with the Assistance of a Third Party:** A reporting party may seek assistance in informally resolving a report of Prohibited Conduct from the Title IX Coordinator, who can arrange to have a trained representative facilitate a meeting or meetings between the parties. The availability of this informal resolution is subject to the agreement of the Title IX Coordinator, the reporting party, and the responding party. This form of informal resolution may not be used where the allegation involves sexual assault.

■ **Interventions and Remedies:** Informal resolution agreements may involve a host of interventions and remedies, such as actions designed to maximize the reporting party's access to educational, extracurricular, and/or University employment activities; increased monitoring, supervision, and/or security at locations or activities where the Prohibited Conduct occurred or is likely to reoccur; targeted or broad-based educational programming or training for relevant individuals or groups; academic and/or University housing modifications for reporting parties; workplace modifications for employee reporting parties; and/or any other remedial or protective measures that can be tailored to the involved individuals to achieve the goals of the Policy.

Any form of informal resolution and any combination of interventions and remedies may be utilized. If an agreement acceptable to the University, the reporting party, and the responding party is reached through an informal resolution process, the terms of the agreement are implemented and the matter is resolved and closed. If an agreement is not reached, and the Title IX Coordinator determines that further action is necessary, or if a responding party fails to comply with the terms of the informal resolution, the matter may be referred for a formal investigation. The Title IX Coordinator will maintain records of all reports and conduct referred for informal resolutions. A reporting party should also know that they have option to bring criminal or civil actions against the responding party.

Formal Reporting Options

Bentley University encourages all students, faculty, and staff to file a formal report of an incident to designated campus officials. A list of all responsible employees (those designated officials who have a duty to report incidents of misconduct to the Title IX Coordinator) can be found in **Appendix C** of this policy. Reporting to any of these individuals is considered an official notice to the institution. After you file a report, you should expect the institution to investigate and properly resolve the incident through administrative procedures. Information disclosed in a formal report will be shared only with individuals who need to know of the incident, including the incident investigator, responding party, witness(es), and Title IX coordinators.

Please Note: Separate protocols exist for criminal reports. If you would like to file a criminal report, please contact University Police at 781.891.2201.

Please be aware that if you file a formal report, your name and the relevant reported information will be disclosed and will appear in the investigation report. This also means that the case may proceed to a Title IX Panel Conference.

You may consider filing a report if you:

- Would like formal action taken. Formal action can include assistance in: obtaining a restraining order or University “No Contact” order, filing criminal charges, or conduct or employment action for the responding party if they are found responsible for violating university policy.
- Would like the University to be aware of the situation in case it happens again.

For more information on the Title IX and Gender-Based Discrimination procedures (including investigations and hearings), please contact the Title IX Coordinator or Deputy Title IX Coordinators. You can also review the full policy and appendices [here](#).

Disclosing to Responders on Campus

You may seek advice from other employees on campus after an incident occurs. These responders, including most faculty and staff, are encouraged to call the Title IX coordinator when an incident of sexual violence or misconduct is reported to them, especially if there is cause for fear of a person’s safety. If you are unsure of someone’s duties and ability to maintain your privacy, ask them before you talk with them.

Please note that responders may choose to share your personally identifiable information if it will help to best support you. If information about your identity is shared, it will only be as necessary and with as few people as possible. All efforts will be made to protect your privacy.

You may consider speaking to these responders if you:

- Have more general questions about the policies and procedures
- Are seeking support in accessing confidential resources or reporting options

11. Investigation and Adjudication Procedures and Protocols

For information regarding investigation and adjudication procedures and protocols for reports involving students, please see **Appendix B** of this policy. For procedures and protocols for faculty and staff, please contact the Deputy Title IX Coordinator for Faculty and Staff.

12. Prevention and Education

Bentley University prides itself in being a leader in providing ongoing

educational programs and initiatives for its community related to sex/gender-based discrimination. Examples of these educational efforts include:

- HAVEN (a mandatory online training that educates and raises awareness regarding sexual assault for both undergraduate and graduate students)
- AlcoholEdu (a mandatory *online training* that inspires students to reflect on and consider changing their drinking behaviors)
- Consent Day
- White Ribbon Campaign
- Walk a Mile in Her Shoes
- Guess the Straight Person
- Bystander trainings
- One Love Foundation's Escalation workshop
- Hook up culture panels
- Ally trainings
- Documentaries and guest speakers

13. Trainings for Faculty and Staff

At a minimum, all responsible and confidential employees will receive annual training facilitated by the Title IX staff. The Title IX Panel for student incidents will receive annual trainings, as well. Trainings will occur throughout the year, and you are encouraged to contact the Title IX Coordinator for a complete list of the trainings that have occurred to date, or to inquire about a training for your office or group.

APPENDIX A:

Campus and Community Resources for Title IX and Gender-Based Discrimination

Bentley University offers various resources for students, staff, and faculty seeking information or support regarding gender-based discrimination and harassment. Bentley also acknowledges that each person experiences and responds in different ways, and there are a variety of formal and informal options for support. Please review the information regarding your options for support, assistance, and reporting so that can make an informed

decision based on personal needs. Your needs may change over time, so please know that you may choose to utilize different forms of response at different times.

■ **Accommodations for Students with Disabilities:** By federal law, a person with a disability is any person who: 1) has a physical or mental impairment; 2) has a record of such impairment; or 3) is regarded as having such an impairment, which substantially limits one or more major life activities such as self-care, walking, seeing, hearing, speaking, breathing, or learning. A student requesting an accommodation in regard to a Title IX investigation/adjudication process must follow the appropriate process for requesting an accommodation through the Office of Disability Services (located in Jennison Hall). Additionally, the Office of Disability Services can provide students with a comprehensive list of off-campus resources.

The Office of Disability Services will make a determination regarding the request and notify the appropriate parties. Reasonable accommodations depend upon the nature and degree of severity of the documented disability. While the Americans with Disabilities Act of 1990 requires that priority consideration be given to the specific methods requested by the student, it does not imply that a particular accommodation must be granted if it is deemed not reasonable and other suitable techniques are available.

If you have experienced an act of sex- or gender-based discrimination or harassment, our first concern is your safety and well-being. Bentley University offers some on campus resources to assist students who have been affected by sexual violence or sexual misconduct. The greater Boston area also offers many additional services and support options. Bentley community members are encouraged to utilize any resource on or off campus available to them.

■ **Safety Concerns:** Any individual concerned for their immediate safety on campus can contact University Police at 781.891.3131, and if off campus, should contact the local police via 911.

CONFIDENTIAL RESOURCES ON CAMPUS: If you are not sure if you would like to proceed with formal action (i.e. filing a police report or reporting to the University), there are support services available while you consider those options. The Counseling Center, the Health Center, and the Spiritual Life staff can be good places to start if you are not sure whether to report:

■ **The Counseling Center: 781.891.2274** (located on the second floor of the Callahan Police Building) *All staff in this office are confidential resources*

- **The Health Center: 781.891.2222** (located in the basement of Rhodes Hall)
All clinical staff are confidential resources
- **The Office of Wellness and Health Promotion: 781.891.2274** (located on the second floor of the Callahan Police Building) *The staff in the Office of Wellness and Health Promotion are trained as Resource Advocates and are considered limited reporters, which means they will only share information about the incident reported, not any information that is personally identifiable to you.*
- **The Spiritual Life Center** *All ordained ministers are confidential resources. All lay staff are limited reporters, which means they will only share information about the incident reported, and not any information that is personally identifiable to you.*

FORMAL REPORTING RESOURCES ON CAMPUS: Please contact any of these offices if you would like to file a formal report of an incident of sex- or gender-based discrimination or harassment:

- **The Office of the Dean of Student Affairs: 781.891.2161** (located in the Student Center 320)
- **The Residential Center: 781.891.2148** (located in the Student Center 320)
- **University Police** (located on the first floor of the Callahan Police Building):
Non-Emergency: **781.891.2201** | Emergency: 781.891.3131

OFF CAMPUS/COMMUNITY RESOURCES: The following resources are not managed by Bentley University but may be helpful to you, especially in assisting you with a variety of needs that you may have beyond your campus experience.

- **Newton-Wellesley Hospital**
2014 Washington Street, Newton, MA 02462 | **617.243.6000**
Newton-Wellesley Hospital provides free and confidential services for survivors of domestic and sexual violence. Domestic violence and sexual trauma affects people of every race, culture, faith, age, gender identity and sexual orientation.
- **Fenway Community Health Center**
(several locations) | **1.888.242.0900**
The mission of Fenway Health is to enhance the wellbeing of the lesbian, gay, bisexual and transgender community and all people in our neighborhoods and beyond, through access to the highest quality health care, education, research and advocacy.
- **Boston Area Rape Crisis Center (BARCC)**
Hotline: **1.800.841.8371** | Business: **617.492.9306**
BARCC was founded in 1973 to create a hotline to answer calls from rape survivors.

Today, it is a national leader in providing a 24-hour hotline, 24-hour medical advocacy, individual and group counseling, and legal advocacy. BARCC also provides community awareness and prevention services

BARCC assists thousands of sexual violence survivors and their families, friends and communities each year, regardless of sex, gender identity, race, physical/developmental disabilities, income, ethnicity, class, religion, or sexual orientation. Services are provided in English, Spanish, Haitian Creole, and French, with other languages available upon request.

■ Casa Myrna

Hotline: **1.877.785.2020**

Casa Myrna provides safe housing, legal assistance, counseling, and other support services for survivors of domestic abuse and relationship violence. Services are offered in multiple languages.

■ Rape, Abuse and Incest National Network (RAINN)

Hotline: **1.800.656.HOPE**

The Rape, Abuse and Incest National Network is the nation's largest anti-sexual violence organization. RAINN operates the national sexual assault hotline at **1.800.656.HOPE (4673)** and the national sexual assault online hotline at **rainn.org**. The hotline offers free, confidential services. RAINN educates the public about sexual violence and leads national efforts to prevent sexual violence, improve services to victims, and ensure that rapists are brought to justice.

■ REACH (Refuge, Education, Advocacy, Change)

Hotline: **1.800.899.4000**

REACH is committed to advancing the safety, healing, and empowerment of those who experience domestic or relationship violence, through direct services and education while promoting social justice for individuals and families of all backgrounds. Based in Waltham, REACH offers free, community-based supportive services, including support groups, legal and community advocacy, and child and adolescent therapy.

■ SANE (Sexual Assault Nurse Examiners)

SANE (sexual assault nurse examiners) are registered nurses and nurse practitioners who have completed specialized training to assist sexual assault victims. They perform the pelvic exams and collect all forensic evidence (think CSI). SANE nurses are available at only specific hospital emergency rooms. The evidence collected is sealed in Massachusetts evidence collection kits (rape kits) and sent to a crime lab for evaluation. The SANE nurse records the victim's account of the assault and can testify at any legal proceedings. Additionally, the kits can remain confidential and are released to the police only at the victim's request.

Both the Boston Police Crime Lab and the State Police Crime Lab report that SANE

nurses gather better evidence than non-SANE nurses. Also, having one person maintain control of all of the rape kit evidence before it gets to the lab reduces any chance of errors and makes prosecution of the perpetrator easier. The Massachusetts Department of Health reports that when a SANE nurse is utilized, a guilty verdict is returned 95 to 100 percent of the time.

APPENDIX B:

Investigation and Adjudication Procedures and Protocols for Incidents Involving Students

I. INTRODUCTION:

Bentley University will always respond to reports, reports, allegations, and information about sex- and gender-based discrimination that it knows or should know about. These responses will serve to stop prohibited conduct, prevent its recurrence, and address any lingering impact that it had on both individuals and the larger campus community.

Congress passed the Higher Education Amendments in 1972, and included within them was Title IX, which states:

“No person in the United States shall, on the basis of sex, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any education program or activity receiving Federal financial assistance...”

Since 1972, several other federal and Massachusetts state laws have been adopted to offer further protection to those in higher education (i.e., students, staff, faculty, and third parties) from discrimination and harassment based on a person’s sex or gender. Bentley University is firmly committed to establishing an environment free of such discrimination and prohibits such acts, including: sexual harassment, sexual exploitation, sexual harassment including sexual violence (i.e., sexual assault and non-consensual sexual touching, forcible or not), relationship abuse (including domestic violence and dating violence), voyeurism, and stalking.

Additionally, retaliation against anyone who reports an incident of harassment or discrimination listed above, brings forward a report, or participates in an investigation of harassment or discrimination is also prohibited. Retaliation is also prohibited against those who, in good faith and reasonable manner, oppose an act or policy believed to constitute sex- or gender-based discrimination. It is the responsibility of Bentley University’s Title IX Coordinator to ensure that inquiries into reports of

misconduct described above are made, as well as formal investigations consistent with applicable grievance procedures that are described in the following policy.

Bentley also reaffirms the rights of reporting parties to decide whether they wish to be involved in any of the University's processes to address sex- and gender-based harassment or discrimination. Bentley is strongly committed to supporting reporting parties through the numerous support services available. The University encourages those who wish to receive confidential support services regarding sex- and gender-based discrimination to seek assistance from staff in the Counseling Center, the Health Center, the Boston Area Rape Crisis Center, REACH Beyond Domestic Violence, and/or seek medical attention.

Responsible employees of the University are required by law to report allegations of sexual harassment and other forms of sex- and gender-based discrimination that they observe or learn about to the Title IX Coordinator. The University has identified its "responsible employees" to include Deans and Directors in the Division of Student Affairs, all staff members in the Office of the Dean of Student Affairs, University Police, and all Residential Center Staff (including Resident Assistants). Employees whose positions legally require confidentiality (i.e., licensed mental health counselors and health professionals) are not responsible employees. If you have a question regarding reporting responsibilities, please contact the Title IX Coordinator.

All employees of Bentley University are strongly encouraged to offer information on how to report such incidents to students and colleagues, as well as report this conduct directly to the Title IX coordinator. Responsible employees who fail to report allegations of sexual harassment and other forms sexual misconduct that they observe or learn about may be subject to disciplinary action. Bentley University is mandated to respond promptly and appropriately to any allegations of sexual harassment or other forms of gender-based discrimination. Under these policies, the university will consider the effects of off-campus conduct for faculty, staff, students, visitors, and community members when evaluating whether a hostile environment was created on campus. Any person responsible for, or involved in, retaliation will be subject to disciplinary action up to and including expulsion or termination.

Additionally, Bentley seeks to ensure that our campus and culture are inclusive for all students, and as such has committed to engaging in several preventative and proactive educational programs and initiatives.

II. PRELIMINARY ISSUES/DEFINITIONS

A. Jurisdiction:

Any person may file a report of sexual misconduct through this process against a Bentley student who is currently enrolled in the University, regardless of where the alleged Sexual Misconduct occurred. The person filing the report is the Reporting party. The person against whom the report is filed is the Responding party.

The Reporting party need not be a Bentley student, although the majority of disciplinary charges brought against Bentley students are brought by other students. If the person bringing the report is not a current Bentley student and/or the alleged conduct did not occur on campus, at a University affiliated location, or at a University sponsored event, the matter will be referred to the Title IX Coordinator (Erin Kelley, **781.891.2329**) for a determination regarding whether the University can exercise jurisdiction over the matter. Although there is no geographical limitation to invoking this process, it should be noted that the greater the distance away from campus that the misconduct is alleged to have occurred, the more difficult it may be for the University to investigate and address the conduct.

In cases where Bentley has exercised jurisdiction, the University will investigate the incident of sex/gender-based harassment or discrimination to the best of its ability regardless of location.

B. Administrative Investigation/Disciplinary Action

The University may independently initiate a disciplinary investigation/action against a person under this adjudication process, called a “Dean’s Report.” In this type of Administrative Investigation or Action, the University will act as the reporting party in the adjudication of a sexual misconduct report against a person. Such reports will proceed under the processes outlined herein and may result in disciplinary action as if the reporting party were a student.

C. Timing of Reports

There is no time limit for the submission of a report alleging Sexual Misconduct. A report received after the semester has ended or during a University break may result in a delay in the adjudication of the report until the beginning of the subsequent semester in which the Responding party is enrolled.

Please Note: The University's ability to provide effective sanctions for violations of this policy is limited once the Responding party is no longer enrolled at Bentley.

The University reserves the right to initiate adjudication of a report immediately when necessary to protect the interests and safety of the Bentley University community, even when the incident takes place after the end of the semester.

D. Intentional Presentation of False Information

Participants in the Title IX and Gender-Based Discrimination Adjudication Process must present, in good faith, truthful and accurate information to those involved in ensuring a fair process (including Title IX and Deputy Title IX coordinators, Independent Investigators, and the Title IX Panel). Knowingly making false statements or presenting inaccurate information is unacceptable and will result in a separate disciplinary action regarding that conduct.

Please note that filing a report or providing information which a party or witness genuinely believes is accurate, but which is ultimately dismissed due to insufficient evidence or found to be untrue, does NOT constitute the intentional presentation of false information.

E. Reporting Conduct/Leniency

Students may be concerned about reporting sexual misconduct believing that their own behavior might subject them to disciplinary action (e.g., a reporting party or witness is underage and was using alcohol or drugs at the time of the incident). Witnesses and reporting parties should be assured that the focus in matters of sexual misconduct is always on the reported behavior, not on whether someone was, for example, using alcohol or drugs at the time. Individuals are encouraged to come forward and report such conduct regardless of the surrounding circumstances.

In situations involving allegations of sexual misconduct, Bentley University will seek to make the Sexual Misconduct allegation the primary focus of any investigation or disciplinary action. In such circumstances, the University will exercise leniency regarding secondary conduct violations (e.g. underage drinking) and those issues will not be subjected to adjudication. It should be noted that the use of alcohol or drugs does not excuse sexual misconduct and a person who has been incapacitated through the use of alcohol and drugs (or by any other means) cannot give effective consent to sexual activity.

F. Right to Investigate and Decide Related Matters

The Independent Investigation and the Title IX Panel's Decision will not be restricted to the violations alleged in the formal report. The Panel reserves the authority to pursue any additional potential violations of University Policy that have been identified through the Title IX and Gender-Based Discrimination Adjudication Process Investigation. The Title IX Coordinator will notify the parties of the new allegations, and will decide whether such allegations will be investigated by the Independent Investigator or will be considered in another disciplinary process. In any case, the adjudication of any other violations of Policy outside of the realm of sexual misconduct will not delay the prompt resolution of the pending Title IX report.

G. No Contact Between Participants

When the Title IX coordinator receives a formal report, a University No Contact Order (sometimes also known as a stay-away order) may be issued barring any communication between the Reporting party and the Responding party. This Order prohibits any attempt to contact or respond to any communication from the other party, either directly or through others (e.g. friends, family members, attorneys, others). The Title IX staff will work with students involved in the Title IX and Gender-Based Discrimination Adjudication Process to help facilitate the No Contact Order between the parties, so that they may attend classes and use University facilities as appropriate. A No Contact Order may be extended after the conclusion of the adjudication process at the request of either party. In cases where a demonstrated violation of this Order has been shown, the responsible student may be separated from the University pending the final resolution of the adjudication process. Bentley Police are able to provide information and assistance to students who wish to seek a protective order from the courts.

H. Interim Support Measures

The University will not automatically restrict a student from attending classes or participating in other University activities on the basis of a formal report. However, the University does reserve the right to impose interim measures at any time upon learning of an allegation of sexual misconduct, if the University has concerns about the safety of the Bentley community. Such measures may include, but are not limited to, restrictions regarding movement on campus, removal from University housing and/or removal from campus. The decision to impose interim support measures is made at the discretion of the Title IX Coordinator. The University will also

enforce any orders that are issued by the Courts of the Commonwealth of Massachusetts.

I. Retaliation

Retaliation against anyone who brings forward a report of sexual misconduct, or who participates in this adjudication process in any manner is strictly prohibited. Retaliation is also prohibited against anyone who opposes, in a reasonable manner, an act or policy believed to constitute a violation of the Title IX and Gender-Based Discrimination Policy. Retaliation includes things like hostility, intimidation, threats, disseminating information about a report or ongoing investigation, exclusion or discriminating against an individual because of the individual's report or participation in this process.

Anyone responsible for retaliation or threats of retaliation, whether against the reporting party or another person, will be subject to disciplinary action by the University. A party may also be responsible for retaliation by someone affiliated with them (i.e., a friend or family member). Retaliation should be reported promptly to the Title IX Coordinator (Erin Kelley, **781.891.2329**). Retaliation by a person not affiliated with the University may be addressed by the police.

J. Witnesses

The Reporting and Responding Parties have the right to identify any individuals who may be witnesses to the conduct alleged in a formal report. The parties should be aware that it is possible for both the Reporting and Responding Parties to list the same people to speak as witnesses on their behalf. Witnesses should only be encouraged to cooperate and to speak the truth. Witnesses should not be intimidated, threatened, or improperly influenced in any way by either party or through others (e.g. friends, family members, attorneys, others). Any attempt to threaten, intimidate or the otherwise improperly influence the testimony of a witness will result in a separate disciplinary action by the University. The Investigator will attempt to interview any witnesses identified by the parties that the investigator deems to be relevant to the resolution of the formal report.

K. Support Person

Involved parties in the Title IX and Gender-Based Discrimination Adjudication Process as Reporting or Responding Parties may be more comfortable navigating the process with the help of a support person. A

support person is someone whom the party trusts to provide advice and support during the process. A support person can be any person the party feels comfortable confiding in, and need not be affiliated with the University (i.e. a friend, a family member, a person from a support or advocacy agency). A support person may accompany the party to any part of the adjudication process, including any meetings with the Title IX Coordinator (or Deputy Coordinator), the Title IX Panel Conference, and Investigator. The support person does not participate in the process and, as such, cannot be a witness to the allegations in the report. A support person must agree to maintain the confidentiality of the process.

L. Confidentiality

Any information or written material related to a formal report will be treated as confidential. Disclosure of such information by parties or witnesses to anyone other than the Title IX (or Deputy) Coordinator, the Panel, the Investigator, legal counsel, support persons, clergy, and/or confidential counselors is strictly prohibited and may subject the person responsible for the disclosure to disciplinary action. Although discretion will remain important, the parties are not restricted from discussing and sharing information relating to their report with others that may support them or assist them in preparing their report. The Investigator, the Panel, legal counsel, support persons, clergy, confidential counselors and any other authorized person with whom a student has shared disciplinary case materials are prohibited from disclosing that information to others without the express written permission of the Title IX Coordinator.

Participants should be aware that the University maintains the discretion to share confidential information internally, if necessary, to comply with its obligations regarding campus safety and Title IX. If a student participant in this process is also enrolled in another institution, the University may be required to disclose information regarding the pending report to that organization. In either situation, such disclosures will be made in the most limited manner possible and the recipients will be advised that the information must be maintained in a confidential manner.

The University will maintain confidentiality during and after the investigation, with the exception of generic reporting of the case in the University's Annual Security Report. In some instances, the Responding party can be spoken to without the Reporting party being identified and without filing or moving forward with a formal report.

In these instances the privacy and confidentiality of the individual raising a concern will be protected to the extent possible. In other cases, issues of

confidentiality must be balanced against the University's need to investigate and to take appropriate action.

M. Attorneys

Although not necessary, the Reporting and Responding Parties have the right to seek the assistance of a private attorney, at their own expense, regarding a formal report. An attorney for a party may inquire with the Title IX Coordinator regarding the pending report.

N. Criminal Conduct

When a formal report involves allegations which may also constitute criminal conduct, participants are advised to seek legal counsel before making any written or oral statements. This Title IX and Gender-Based Discrimination Adjudication Process does not attempt to create a courtroom environment and attorneys for students are not permitted to actively participate in the process. However, participants should seek legal advice about how this disciplinary process could impact any criminal case in which they are or may become involved.

The University will conduct its own investigation and adjudication of a formal report, regardless of whether the alleged misconduct is also being pursued through the criminal justice system. The University will attempt to comply with law enforcement requests for cooperation. At times, that cooperation may require the University to temporarily suspend its independent investigation while law enforcement gathers evidence. The University will promptly resume its independent investigation as soon as it is notified that doing so would not impede any law enforcement activities.

O. Admissibility of Evidence

The Independent Investigation process is intended to arrive at the truth of the matter, without the formalities associated with rules and procedures specifically designed by lawmakers to manage courtroom litigation. Students can address issues and present documents to the investigator without concerns about admissibility. It should be noted that if the Investigator determines that the issues raised and/or documents presented are relevant and probative of whether the alleged conduct occurred, then, in the interest of fairness, that information will be disclosed to the opposing party.

- 1. Sexual History:** In a case of sexual misconduct, the past sexual history of the Reporting and/or the Responding party or either party's sexual history with others will **NOT** be used in determining whether the alleged

misconduct occurred. Prior consensual sexual activity between the two parties will not be determinative of the issue of consent in the pending formal report. Consent to one sexual act does not constitute consent for another sexual act.

2. Medical and Counseling Records: The use of medical and/or counseling records in the Adjudication Process is rare. Medical and counseling records are privileged and confidential documents that students will never be required to disclose in this Process. “Privileged” means that these documents cannot be shared with anyone other than the treating professional unless the patient agrees to disclosure. Students should be aware that there are legal implications to agreeing to produce privileged records. Students are encouraged to seek advice from a knowledgeable source about the possible consequences of releasing this information. A Reporting/Responding party who, after due consideration, believes that their own medical or counseling records would be helpful in determining whether sexual misconduct occurred, has several options for voluntarily presenting this information:

- a. The Reporting party can voluntarily decide to present their own medical or counseling records to the Independent Investigator as part of the documents which they would like to have the investigator consider in conducting their investigation. Please note that if a party decides to produce such records, they must be produced in their entirety. The production of excerpts or selected documents is inappropriate and will not be considered.
- b. On occasion, the Investigator may ask the Reporting party to voluntarily agree to provide these records if the Investigator believes that such documentation exists and that it would be helpful in conducting their investigation. A party is under no obligation to provide this information and may simply say “no” to this request. A party has a right to refuse to provide these records and that refusal is completely acceptable.

Prior to responding to such a request, a party is encouraged to consult with their support person about the implications of agreeing or denying the request. Please note that if a party does decide to produce such records, they must be produced in their entirety. The production of excerpts or selected documents is inappropriate and will not be considered.

- c. The Investigator may ask a Reporting or Responding party to voluntarily provide a verification of therapeutic or medical services to confirm simply that such treatment occurred, but not providing any

details regarding that treatment. On rare occasions, a person may be in possession of the medical and/or counseling records of another party or witness. Such records can only be presented to the Investigator under the following circumstances: (i) the person can show that the records are relevant to the pending formal report; (ii) the person can document or otherwise prove that the records were legally obtained; and (iii) the records can be authenticated. Failure to meet any of these conditions means that the records will not be considered in the determination regarding the alleged misconduct.

P. Parental Notification

Since the University views students as adults, parents and guardians will not be notified when a formal report is filed under the Title IX and Gender-Based Discrimination Policy. Students are encouraged to inform their parent(s) or guardian(s) if they are involved in a disciplinary action and should refer them to the Title IX Coordinator if they have questions. If, at the conclusion of the adjudication, a student is separated from the University or University Housing, the University generally will attempt to inform that student's parent(s) or guardian(s) at the time such discipline is imposed.

Q. Title IX Inquiries and Investigations

Under state and federal law, including Title IX, sexual misconduct (which includes sexual harassment, sex/gender discrimination, sexual exploitation, rape, sexual assault, relationship violence or stalking) is prohibited. Definitions of this conduct and options for addressing this conduct are included in the Title IX and Gender-Based Discrimination policy. Pursuant to its obligations under the law, including Title IX, the University will make an inquiry into all allegations of sexual misconduct of which it becomes aware, regardless of whether a formal report has been filed. The independent investigator act as the neutral fact-finding body responsible for making inquiries into allegations of conduct that may violate Title IX. As such, it is possible that the parties may have been interviewed by an independent investigator prior to a formal report having been filed. An independent investigator that has been vetted by the University will be retained for all cases of sex/gender-based harassment and/or discrimination brought under this Adjudication Process. Upon the initiation of an independent investigation by the Title IX Coordinator under this process, the independent investigator will review any information previously obtained through an inquiry (if made), in light of the information provided through the statements of the parties regarding the report. The independent investigator will then conduct any additional investigation that is necessary to address

the allegations of the report. The investigator will include all relevant findings from the investigation in the Investigation Report submitted to the Title IX Panel. Investigations will only be conducted by investigators who have been specially trained to address issues of sexual misconduct and who are otherwise knowledgeable about investigating and analyzing Title IX reports.

R. Title IX Panel Conference

Under Title IX and Gender-Based Discrimination Adjudication Process, the final decision regarding the report will be made by a Panel of three trained individuals. This Panel will consist of three administrators from within the University. These panelists will be chosen from a pool of administrators, all of whom will be specially trained in the adjudication of sexual misconduct. The panelists from this pool are by the Title IX Coordinator. Either party has the right to raise any concerns they may have regarding a possible conflict of interest with any of the Panel members who have been assigned to the matter. In the event that one of the members has a conflict of interest, they may recuse themselves from the panel. The Title IX Coordinator will then choose another trained panel member to sit in the place of the original panelist. The Title IX Coordinator will select a Title IX panel chair. Decisions regarding the composition of the panel are made at the sole discretion of the Title IX Coordinator. An effort will be made to have the panel be reflective of the demographics/identities of the parties, if known.

III. THE ADJUDICATION PROCESS

This is the adjudication process under which allegations of sexual misconduct will be resolved. Under ordinary circumstances during the academic year, this adjudication process should be completed within 90 business days from the receipt of the formal report. Formal reporting options can be found in section **10. Reporting an Incident** of the Title IX and Gender-Based Discrimination policy. Students also may have legal remedies available outside of Bentley, including filing charges with the police, filing a civil action and/or filing an administrative action.

Bentley University recognizes that the decision about whether to bring a formal report against another student can be complicated and challenging. Nevertheless, students should know that all reports will be taken seriously and will be investigated.

A. Filing a Formal Report

A person who has experienced an incident of sexual misconduct including

sexual harassment, sex/gender discrimination, sexual assault, relationship abuse, stalking, sexual exploitation, and/or any other sexual misconduct committed by a member of the Bentley community may file a report against the individual responsible for that conduct.

The individual bringing the allegation is called the reporting party. The reporting party is welcome to bring a support person with them to any meetings with the Title IX or Deputy Title IX Coordinator.

Reports should be filed with either:

Erin Kelley Title IX Coordinator/Director of Student Conduct and Development Student Center 320 781.891.2329 ekelley@bentley.edu	Alex Hirs Deputy Title IX Coordinator for Student Support/Assistant Director of Gender Equity and Development Student Center 320 781.891.2364 ahirs@bentley.edu
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- 1. Reporting Party's Statement:** To file a formal report against a student, the reporting party must submit an initial, written statement detailing the allegations of the misconduct. This statement is the first opportunity for the reporting party to describe the allegations against the responding party.

The Reporting party's Statement should include the name of the accused student, the date and location of the alleged sexual misconduct and the details of the alleged misconduct. This statement should provide details about the facts surrounding the alleged sexual misconduct. The statement must be written by the Reporting party.

- 2. Confidentiality/Non-Retaliation Acknowledgment:** The reporting party will be required to not disclose or discuss anything relating to the formal report with anyone other than those authorized to see/hear such information under this process. The reporting party will still be able to discuss the facts underlying the subject of the formal report with counselors, clergy, other therapeutic professionals and family. The reporting party should refrain from discussing the formal report itself and/or the adjudication process with anyone affiliated with Bentley. This is to preserve the integrity of the investigative process and also to prevent allegations of retaliation. Through this acknowledgment, the reporting party also agrees to refrain from any retaliatory conduct against the responding party or any witnesses in the matter, as discussed under Section II, Paragraph I., and may be responsible for any retaliation by persons affiliated with the reporting party (i.e., a friend or family member).

B. Responding to a Formal Report

The person against whom the formal report is brought is called the responding party. The responding party shall be given written notification when a formal report has been filed against them.

- 1. Initial Meeting:** Notice that a formal report has been filed against a responding party will be provided to that student in person. The responding party is welcome to bring a support person by either the Title IX Coordinator or Deputy Title IX Coordinator. At this meeting, the Title IX or Deputy Title IX Coordinator will discuss the nature of the report, explain the rights and responsibilities of the responding party, explain the prohibition against retaliation, review the investigation and adjudication Process and give the responding party a copy of the relevant policies.
- 2. Confidentiality/Non-Retaliation Acknowledgment:** The Responding party is required to adhere to the Confidentiality/Non-Retaliation Acknowledgment, agreeing not to disclose or discuss anything relating to the formal report with anyone other than those authorized to see/hear such information under this process. Through this acknowledgment, the responding party also agrees to refrain from any retaliatory conduct against the reporting party or any witnesses in the matter, as discussed under Section II, Paragraph I., and may be responsible for any retaliation by persons affiliated with the responding party (i.e. a friend or family member). Refusal/failure by the responding party to meet and cooperate with the Title IX or Deputy Title IX Coordinator or Independent Investigator regarding this matter or to abide by the Confidentiality/Non-Retaliation Acknowledgment, as determined by the Title IX Coordinator, may result in either (1) a suspension of the responding party from the University and/or (2) the adjudication of the formal report without input from the responding party.
- 3. Responding Party's Statement:** The responding party may choose to provide a written response to the formal report. The responding party's Statement will be submitted to the independent investigator and serves as an opportunity to respond to the allegations made by the reporting party. This statement should provide as much detail as possible about the facts surrounding the alleged sexual misconduct and must be written by the responding party.

C. Independent Investigation

After both parties have submitted their statements, Title IX Coordinator will initiate an Investigation, utilizing neutral, external investigators retained

by Bentley. These investigators have been vetted by the University, are determined to be free from bias, and well-trained in conducting Title IX investigations.

It is the responsibility of the investigator, not the parties, to gather the evidence relevant to the formal report and the facts raised in the parties' statement, to the extent reasonably possible. During the course of the investigation, the investigator may utilize some or all of the following procedures, in whatever order the Investigator deems most appropriate. The scope of the independent investigation will not be limited to information provided by the parties or to the violations outlined in the formal report. In all cases, the investigator will conduct an adequate, reliable, and impartial investigation into the allegations of the report, reviewing all evidence deemed to be relevant. Parties and Witnesses should make themselves reasonably available to the Investigator. The Bentley Beliefs compel all students to act with integrity and honesty in their academic, personal, and professional lives. Students who refuse to cooperate with the Investigator in the independent investigation, as determined by the Title IX Coordinator, are in opposition of this core belief and may face disciplinary action for their refusal to cooperate.

- 1. Document Review:** The investigator will review the statements and all of the supporting material referenced. The investigator will then attempt to obtain any documents or other materials deemed relevant to the investigation. Any documents or information deemed to be material to the findings regarding the formal report, or any other violations will be disclosed to both parties for comment or rebuttal.
- 2. Party Interviews:** The investigator will interview the reporting party and the responding party separately. This meeting is an opportunity for the participant to discuss their recollection of the event in question, supplement any written statements already submitted, voice any concerns, and to work with the Investigator to determine what information may helpful in the investigation of the allegations. Parties may also discuss the impact that this experience has had on them. The investigator may interview the parties more than once, as necessary.

The reporting party's or responding party's support person may accompany them to all the meetings with the Investigator but may not participate in the conversation. Prior to sitting in on any interviews, the support person will be required to agree to a confidentiality/non-retaliation Acknowledgment, agreeing not to disclose or discuss anything relating to the formal report with anyone other than those authorized to see or hear such information under this process. At the conclusion

of the interview, participants are permitted to make an optional closing statement.

A description of all sources of information (e.g., witnesses, correspondence, records, etc.) should be provided to the investigator. This should include information which the party believes should be considered in deciding disciplinary action, along with a brief explanation of why this information would be relevant and helpful to the process. Please identify the sources and/or location of this supporting information but do not attempt to obtain this information yourself. The independent investigator will solicit any relevant statements or documents referenced through this process.

- 3. Witness Interviews:** The investigator will attempt to interview any witnesses identified by the parties that the investigator deems to be relevant to the resolution of the formal report. The investigator may also interview any other persons which they find to be potentially relevant to this matter. Witnesses may request from the Title IX or Deputy Title IX Coordinator a University Support person to be present with them during their interview. Prior to being interviewed, a witness will be required to agree to a confidentiality/non-retaliation acknowledgment, agreeing not to disclose or discuss anything relating to the formal report and their interview with anyone. Through this acknowledgment, the witness will also agree to refrain from any retaliatory conduct against the parties or any witnesses in the matter, as discussed under Section II, Letter I, and may be responsible for any retaliation by persons affiliated with them (i.e., a friend or family member). The investigator will employ best efforts to interview relevant witnesses who are no longer on campus or in the Boston area, attempting to contact them by phone or internet.
- 4. Expert Witnesses:** The investigator reserves the right to consult with any experts which they deem necessary to the determination of the facts of this case. An expert witness could be consulted to review or provide a professional opinion regarding evidence discovered in the independent investigation.

D. Investigation Report

Once the independent investigation has been completed, the investigator will evaluate the information obtained during this process. The investigator will prepare a report summarizing and analyzing the relevant facts received through the investigation, noting any supporting documentation or statements. The investigator may draw conclusions and make recommendations regarding the credibility of all testimony and the

reliability of documentation. The investigator will present the investigation report to the Title IX Panel. Both the reporting and responding parties will be allowed to review the investigation report prior to the Title IX Panel's Conference. Students and their support person will be allowed to view the investigation report in the presence of the Title IX staff or their designee.

E. Rebuttal Documentation

After reviewing the investigation report, the parties have the opportunity to provide any rebuttal statements, documents, or other new information regarding the sources of potentially relevant information and/or witnesses in writing to the Title IX Coordinator within 72 hours of the Title IX Panel Conference. Any information that is submitted will be made available to the other party for review and will be provided to the Title IX panel.

F. Final Statements to the Title IX Panel

Reporting and responding parties will be provided the opportunity to provide separate final statements at the Title IX Panel Conference. At this time, each party will have an opportunity to comment on and respond to the information presented in the investigation report.

F. Supplemental Investigation Procedures

After meeting with the parties and reviewing any additional information submitted for consideration, the panel may determine that additional inquiry is needed in order for a decision to be rendered regarding the formal report. If so, the Title IX panel chair will ask that the investigator conduct a supplemental investigation regarding the areas of concern. The investigator will focus any additional investigation on the specific inquiries made by the Title IX panel. The investigator will then prepare and submit a supplemental investigation report addressing the findings as to the issues raised by the Title IX panel. Under ordinary circumstances, any additional investigation and supplemental investigation report should be completed and submitted to the Panel within 30 days of the request for the supplemental investigation. The Title IX panel chair reserves the right to schedule a subsequent Title IX panel conference to address the findings from the supplemental investigation with the parties separately, at its discretion, should the Panel feel that such a meeting would be helpful to the process.

G. Withdrawal/Acceptance of Charges

1. Reporting Party May Withdraw the Report: Prior to the Title IX panel's

Decision, the reporting party may withdraw the formal report. Withdrawal of the report will, under most circumstances, end the adjudication Process for that report. Once a report has been withdrawn, it cannot be filed again by the reporting party within this Process. The University reserves the right to move forward with the formal report, even after the reporting party decides to withdraw it, in order to protect the interests and safety of the Bentley community.

- 2. Responding Party May Accept Responsibility:** Prior to the Title IX panel's decision, the responding party may accept responsibility for the misconduct alleged in the formal report. This acceptance, under most circumstances, will end the adjudication process and the matter would then be referred to the Title IX panel to decide the issue of the appropriate disciplinary action for the responding party. The Panel may take the responding party's acceptance of responsibility into consideration in determining the appropriate sanction. Once the responding party accepts responsibility, such acceptance cannot be withdrawn. A written finding of the accepted report and the resulting disciplinary action will be issued by the panel, which will become part of the Responding party's student records and will be shared with the reporting party.
- 3. Responding Party May Withdraw:** At any time up until three (3) days after the Title IX Panel Conference, the responding party has the right to withdraw as a student from Bentley University. In such a case, the responding party will leave the University with the notation "Student Withdrew with Disciplinary Charges Pending" on their disciplinary record. After withdrawing, the responding party will not be eligible to return to the University. A responding party's withdrawal will end the Adjudication Process for that report. On the fourth (4th) day after the Title IX Panel Conference, the responding party will no longer be allowed to withdraw, as the pending decision from the panel and disciplinary action will determine their status with the University. Under certain circumstances, and at the discretion of the panel, the time period for the responding party to withdraw may be extended if a supplemental fact-finding investigation has been requested by the panel. In that case, the responding party's right to withdraw would expire three (3) days after any subsequent Title IX Panel Conference is held, or after notice that a subsequent Title IX Panel Conference will not be scheduled.

H. Panel's Decision

Upon determining that all of the issues regarding the formal report have

been fully investigated and adequately addressed, the Title IX panel will issue its decision. The decision will be made on the preponderance of the evidence standard — that is whether the facts presented in the investigation report support a finding that it is more likely than not that University policy has been violated. The decision of the panel will be reached by a majority. The Title IX panel will base its decision on the information presented in the investigation report and any supplemental investigation report. Under ordinary circumstances, the Title IX panel's decision will be issued in writing within 10-14 business days after the Title IX Panel Conference. The panel chair will draft the panel's written decision and submit it to the Title IX Coordinator.

The Panel may issue the following decisions to a formal report:

- A finding that a University policy was violated. The panel will then impose the appropriate disciplinary action.
- A finding that a University policy was not violated as there is insufficient information to substantiate the allegations of the formal report.

Once the panel's decision has been issued, both the reporting party and the responding party will be notified by the Title IX staff. Each party will meet with the Title IX staff separately to receive a copy of the panel's decision, referencing the supporting information that the panel relied on from the investigation report. The panel's decision is a confidential document that can only be shared with authorized persons as noted in this process (i.e., support persons, attorneys, counselors, or clergy). Anyone disclosing the panel's decision to a person not authorized to see it shall be subject to disciplinary action. If the Title IX panel's decision results in disciplinary action which includes separation from campus, that sanction will be imposed immediately, regardless of whether an appeal has or will be filed. The Title IX Coordinator has the discretion to allow a responding party to complete any pending coursework remotely, if deemed appropriate by the faculty members involved..

I. Appellate Process

Both the reporting party and responding party are entitled to appeal a Title IX panel's decision issued through the adjudication process. The person filing the appeal is the appellant. An appeal must be filed, in writing, within seven business days of their meeting with the Title IX staff.

The appeal will be considered by an impartial and well-trained administrator, or administrators, who were not part of the initial decision-making panel. In considering the appeal, the appellate

administrator(s) will be given the appeal, the investigative report including the statements of the reporting party and responding party, and the Title IX panel's decision to review.

To submit an appeal, an appellant should write a letter to the appellate administrator, the Vice President of Student Affairs or their designee, outlining their reason for appeal. The opposing party will be notified if an appeal has been filed. In some situations, both parties may file an appeal. In this situation, the appellate administrator will consider and review both appeals together.

The appeal letter should be submitted via e-mail to:

J. Andrew Shepardson, Ph.D.
Vice President of Student Affairs/Dean of Students
Bentley University
ashepardson@bentley.edu

There are only three grounds on which a Panel's Decision can be appealed:

1. **Procedural Error:** The appellant alleges that there was a deviation or change from the procedures outlined in the University's policy which adversely impacted the outcome of the matter.
2. **New Evidence:** The appellant alleges that, subsequent to the issuing of the Title IX panel's decision, new evidence became available which would have impacted the outcome of the formal report. The appellant must: (i) present the new evidence; (ii) show why it was unavailable prior to the Title IX Panel's Decision; and (iii) show that the new evidence could have altered the outcome of the report. The opposing party will be given an opportunity to rebut these assertions by the appellant. If the appellate officer(s) determines that there is evidence that meets these requirements, it will remand the matter to the Title IX Panel for investigation and review in light of the new evidence.
3. **Severity of The Disciplinary Action:** The appellant alleges that the sanctions imposed are too harsh or impose an undue hardship.

The written appeal must specifically state the grounds under which the appeal has been filed and must be submitted within the seven day time limit after their meeting with the Title IX staff. The appeal must set forth the information/evidence to support the appeal. Appeals which do not comply with these requirements may not be considered. The appeal is not an opportunity to argue that the initial decision was wrong. The appeal is not a

new fact-finding process. Once the appellate process has been complete, the final decision will be provided to both parties.

J. Conclusion of the Case

- 1. The Title IX Coordinator will maintain investigative files for purposes of Title IX compliance.** Any and all documents retained at the conclusion of a formal or informal resolution of a report will be maintained by the University in a safe and confidential manner.
- 2. Internal Reporting:** Once a final resolution has been reached, whether through a Title IX panel decision or by acceptance of responsibility, that disciplinary decision, if it includes a suspension or expulsion, will become a permanent part of the responding party's student records. As such, the outcome of this disciplinary adjudication may be available to other administrators within the University for their review, if needed.

APPENDIX C:

Types of Employees at Bentley University

Faculty and staff members on campus have different roles and responsibilities in reporting information should a student disclose an act of sexual misconduct. Please pay close attention to both confidential and responsible employees, as they have markedly different duties for reporting information.

For more information regarding resources and support, please contact:

Erin Kelley Title IX Coordinator/Director of Student Conduct and Development Student Center 320 781.891.2329 ekelley@bentley.edu	Alex Hirs Deputy Title IX Coordinator for Student Support/Assistant Director of Gender Equity and Development Student Center 320 781.891.2364 ahirs@bentley.edu
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Confidential Employees

These staff members are not required to report any information about an incident without a student's permission.

Limited Reporters

These staff members can generally talk to a student without revealing

any personally identifiable information about an incident. A student can seek assistance and support from these individuals without triggering a university investigation that would reveal the student's identity or the fact that the student has disclosed the incident.

Responsible Employees

These employees have the duty to report incidents of sexual violence or other student misconduct to the Title IX coordinator. If a student tells a responsible employee about an incident of sexual violence, the student has the right to expect the University to take immediate and appropriate steps to investigate what happened and resolve the matter promptly and equitably.

Responders

These individuals, including most faculty and staff on campus, are encouraged to notify the university when a student reports an incident of sexual violence or misconduct, especially if there is cause for fear of a person's safety. These individuals consist of those without supervisory responsibility or authority to address sexual misconduct.

If you are unsure of someone's duties and ability to maintain your privacy, ask them before you talk to them.

CONFIDENTIAL EMPLOYEES

- Clinicians, physicians and nurses in the Center for Health and Wellness
- Ordained ministers, clergy members and pastoral counselors in the Office of Spiritual Life
- Staff members in the Counseling Center

LIMITED REPORTERS

- Jessica Greher Traue, Center for Health and Wellness
- Non-ordained ministers and lay administrators in the Office of Spiritual Life

RESPONSIBLE EMPLOYEES

- Athletics Professional Staff
- Center for International Students and Scholars (CISS)
- Equity Center educators (ECEs)
- Graduate Student and Academic Services
- The Multicultural Center
- The Office of Academic Services
- The Office of the Dean of Student Affairs
- The Residential Center
- Resident Assistants (RAs)
- Student Programs & Engagement
- University Police

RESPONDERS

- Most faculty and staff members

POLICE CALL BOX MAP

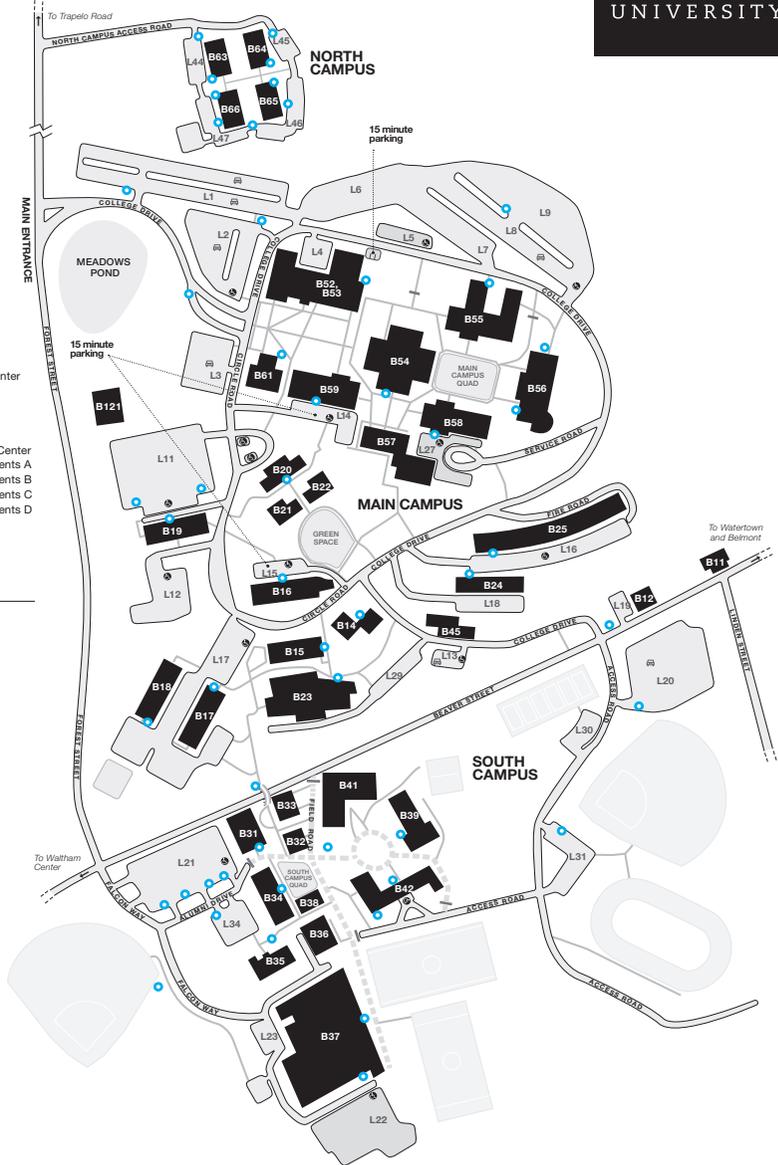


BUILDINGS

- B11 Harrington House
- B12 Stratton House
- B14 Boylston A and B
- B15 Rhodes Hall
- B16 Collins Hall
- B17 Kresge Hall
- B18 Forest Hall
- B19 Miller Hall
- B20 Falcone North
- B21 Falcone East
- B22 Falcone West
- B23 Student Center
- B24 Slade Hall
- B25 The Trees
- B31 Orchard North
- B32 The Castle
- B33 The Cape
- B34 Orchard South
- B35 Lewis Hall
- B36 Facilities/Receiving
- B37 Dana Athletic Center
- B38 Dovecote
- B39 Copley South
- B41 Copley North
- B42 Fenway Hall
- B45 University Police
- B52/B53 LaCava Center
- B54 Bentley Library
- B55 Morison Hall
- B56 Adamian Academic Center
- B57 Smith Academic Technology Center
- B58 Lindsay Hall
- B59 Jennison Hall
- B61 Rauch Administration Center
- B63 North Campus Apartments A
- B64 North Campus Apartments B
- B65 North Campus Apartments C
- B66 North Campus Apartments D
- B121 President's House

PARKING

- GENERAL**
- L1 LaCava 1
- L2 LaCava 2
- L3 Rauch
- L6 LaCava 3
- L7 Morison 7
- L8 Morison 8
- L9 Morison 9
- L20 Athletics 1
- L22 Dana 1
- L30 Athletics 2
- L31 Athletics 3
- RESIDENT**
- L11 Miller 1
- L12 Miller 2
- L16 Trees
- L17 Forest
- L19 Stratton
- L21 Orchard Decks
- L44 North Campus A
- L45 North Campus B
- L46 North Campus C
- L47 North Campus D
- FACULTY AND STAFF**
- L13 Police
- L18 Slade
- L23 Dana 2
- L26 Harrington
- L29 Student Center
- L34 Lewis
- FACULTY-ONLY PARKING**
- L5 Main Campus
- SERVICE AND VENDOR**
- L4 LaCava
- L14 Jennison
- L15 Collins (short term)
- L27 Smith



KEY

- = EMERGENCY PHONES
- = HANDICAPPED PARKING
- = VISITOR PARKING
- = AUTHORIZED VEHICLE ACCESS
- = VEHICLE GATE

CAMPUS MAP

IMPORTANT TELEPHONE NUMBERS

Bentley University Police

Emergencies	781.891.3131
Business Line	781.891.2201
Alcohol and Other Drug Resource Center	781.891.2777
Boston Area Rape Crisis Center Hotline	800.841.8371
Center for Health and Wellness	781.891.2222
Counseling and Student Development	781.891.2274
Domestic Abuse Hotline	800.899.4000
Mount Auburn Hospital	617.499.5025
Newton-Wellesley Hospital Emergency Room	617.243.6193
Newton-Wellesley Urgent Care (Waltham)	617.243.5590
Office of Student Life	781.891.2700
Residence Life Office	781.891.2148
Spiritual Life Center	781.891.2194
Waltham Police (business)	781.893.1212
Waltham Fire (business)	781.893.4105



MAIL Bentley University, 175 Forest Street, Waltham, MA 02452 USA

EMAIL ga_universitypolice@bentley.edu

WEB bentley.edu/police

PHONE +1 781.891.2201 | tty + 781.891.2280

FAX +1 781.891.2559



BENTLEY
UNIVERSITY

BENTLEY UNIVERSITY is one of the nation's leading business schools, dedicated to preparing a new kind of business leader — one with the deep technical skills, broad global perspective, and high ethical standards required to make a difference in an ever-changing world. Our rich, diverse arts and sciences program, combined with an advanced business curriculum, prepares informed professionals who make an impact in their chosen fields. Located on a classic New England campus minutes from Boston, Bentley is a dynamic community of leaders, scholars and creative thinkers. Bentley University Graduate School of Business emphasizes the impact of technology on business practice, in offerings that include MBA and Master of Science programs, PhD programs in accountancy and in business, and customized executive education programs. The university enrolls approximately 4,100 full-time undergraduate, 140 adult part-time undergraduate, 1,430 graduate, and 34 doctoral students. Bentley is accredited by the New England Association of Schools and Colleges; AACSB International — The Association to Advance Collegiate Schools of Business; and the European Quality Improvement System, which benchmarks quality in management and business education.