

Bryant University



2024

Annual Security & Fire Safety Report

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Bryant's Department of Public Safety (DPS) takes great pride in the University's reputation as a safe and secure community in which to live, learn, teach, and work. Situated in a quiet, private, rural setting in Smithfield, Rhode Island, the design of the campus allows for a single point of access that is monitored by public safety officers 24 hours a day/7 days a week.

By actively working with all constituents of the Bryant community, DPS takes every step possible to reduce incidents of incivility or crime. As this report indicates, the limited number of incidents and infrequency is readily apparent.

Bryant's peaceful campus life is the product of not only its sheltered location but also a motivated professional community which adheres to the University's theme: The Character of Success.

Stephen M. Bannon
Executive Director
Department of Public Safety

Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act

The Act is a legislative effort to encourage colleges and universities to inform their campus communities of specific crimes occurring on their campuses. It also focuses on the participation of the entire campus community in responding to the incidence of crime on campus where traditionally the only response to campus crime had been initiated by security, public safety, or university police departments.

Bryant University maintains an open communication policy. Crimes that pose an immediate threat to the community may be reported by such methods as: cell phone calls, text messaging, electronic mail, public address announcement messages, internet protocol (IP) phone announcements, and personal contacts. Each October, the crime statistics for the three most current years are distributed to the community.

The Act mandates the types of crimes for which statistics must be kept in accordance with the definition of the Federal Bureau of Investigation's (FBI) Uniform Crime Reporting system (UCR). The reportable crimes are: murder, manslaughter, aggravated assault, sex offenses, including rape, fondling, incest, statutory rape, robbery, burglary, arson, and motor vehicle theft. Hate crimes pursuant to the preceding crimes must also be reported by category of prejudice. In addition to the hate crimes related to the reportable crimes, above, the following crimes must be also reported as hate crimes when investigation indicates that the motivation was bias-related: larceny/theft; simple assault; intimidation and vandalism. Each is defined in the "Definitions" section of this brochure. Institutions must also report the number of incidents, including arrests, for the following campus crimes: liquor law violations, drug abuse violations, and weapons possession. A daily crime log records all crimes reported to the public safety department. The log includes the nature, date, time, and general location of each crime and the disposition of the complaint (if known), and is available for inspection during normal business hours.

The law serves to inform the Bryant community of each person's responsibility to the crime prevention effort and thereby helps in keeping the Bryant campus a fine place to learn, teach, work and play.

Drug-Free Schools and Communities Act

Bryant University is committed to creating a campus environment that is healthy, safe and free from both the illegal and harmful use of alcohol and others drugs. In compliance with federal regulations, Bryant University has adopted and implemented a program to prevent the illicit use of drugs and abuse of alcohol by its students and employees.

Bryant University prohibits the unlawful possession, use or distribution of illicit

drugs and alcohol by students and employees on its property or as a part of any of its activities. Violations of the university policies and/or local, state, or federal laws will result in disciplinary action and/or the involvement of law enforcement agencies when deemed appropriate.

Alcohol

Among the sanctions provided under state law for the unlawful possession and distribution of alcohol are:

- Possession and/or consumption of alcohol by a person under the age of 21 or the carrying of an open container for alcoholic beverages may result in sanctions or fines of up to \$950, with minimum fines ranging from \$150 for the first offense and \$450 for the third offense. Additional sanctions may include thirty (30) hours of community service, minimum sixty (60) days suspension of defendant's driver's license, and a substance abuse assessment by a license substance abuse professional.
- Sanctions are imposed upon an adult who furnishes alcoholic beverages to a person under the age of 21 and these sanctions may be up to a fine of \$1,000 and six months imprisonment.
- The use by a minor of a false identification card for the purposes of unlawfully obtaining alcoholic beverages in an offense which carries a minimum sanction of \$100.
- Consumption of an alcoholic beverage while operating a motor vehicle may result in a fine of \$300, sixty (60) hours of community service, driver's license suspension, and/or imprisonment for up to one year. Sanctions involving motor vehicle offenses are determined by blood alcohol concentration and the number of violations.

Details on legal sanctions under federal and state law can be found under Rhode Island General Laws (www.rilin.state.ri.us/statutes) Title 3, Chapter 3-8 (Alcohol - Regulation of Sales) and Title 31, Chapter, 31-27 (Motor Vehicle Offenses).

In addition to the local, state, and federal laws, Bryant University has established its own campus policies, which reflect the concern for the health and well-being of its students and employees. In accordance with Rhode Island law, students under the age of 21 may not consume, possess, be in the presence of, purchase, attempt to purchase, or use false identification to purchase alcoholic beverages.

Regardless of age, the university prohibits:

- Common containers
- Providing/serving alcohol to minors

- Selling alcohol to or purchasing alcohol for a minor
- Purchasing and transporting to campus unreasonably high amounts of alcohol
- Open containers in public areas or outside
- Significant impairment of functioning due to alcohol
- Encouraging or contributing to the intoxication of another person
- Drinking games or simulated drinking games (defined as games that promote the rapid consumptions of alcohol. This includes but is not limited to: beer pong, flip cup, funneling, quarters, or altered board games.)
- Possession or use of alcohol paraphernalia/drinking apparatus
- Large alcohol gathering that exceeds space capacity or involves high risk behavior
- Grain alcohol or equivalent substances

Students who are 21 and over may have in their possession not more than the following amounts of alcohol at any time. These amounts are as follows:

- 12 pack of beer
- Or 12 flavored malt beverages/wine coolers
- Or a maximum of 750 milliliters of wine
- Or a maximum of 375 milliliters of distilled spirits

The University will consider each incident on an individual basis and will take into account the severity of the behavior, a student's past disciplinary record, and the specific incident's impact on the community. The hearing officer may increase the severity of the sanctions issued and any use that leads to high risk behavior will be subject to additional sanctions. Students should refer to the Student Handbook to review a list of the educational, administrative, and restrictive sanctions that can be issued due to a policy violation.

Drugs

Legal sanctions are provided by state and federal law for the unlawful possession or distribution of controlled substances and illicit drugs. These sanctions vary, depending upon the type of drug, the quantity (volume) of drugs possessed or distributed, upon the circumstances surrounding the location of the possession, sale, or distribution on or near school premises or distribution to persons under

the age of 18, and whether the offense is a first or subsequent offense. Under state law, the legal sanctions include imprisonment, fine, parole, community service, counseling and rehabilitation referral, and the forfeiture of real or personal property connected with the offense. Prison sentences include life imprisonment and fines up to \$1 million. Certain offenses involving the sale and distribution of drugs may include minimum mandatory sanctions. These minimum mandatory sentences may be as much as 20 years imprisonment. Similar sanctions are imposed under federal law. For a complete listing of drug offenses and sanctions, please refer to Rhode Island General Laws Title 21, Chapters 21-28, and Title 31, Chapter 31-27-2.

All members of the campus community are expected to comply with all federal, state, and local laws regarding illegal drugs, as well as the applicable policies contained in the Student Handbook, Residence Hall Occupancy and Board Agreement, Faculty Federation Contract, and Employee Handbook.

Violations of University Drug policy include:

- In the presence of a controlled substance
- In the presence of drug paraphernalia
- Possession of drug paraphernalia
- Possession of a controlled substance
- Intent or distribution of a controlled substance.

In addition, any full or part-time student or employee found to be in violation of the University drug policy may be subject to applicable legal sanctions as well as disciplinary actions up to and including termination of employment or separation from the University. If a student is convicted of a drug-related felony or misdemeanor that took place while receiving Federal student aid, the student will become ineligible to receive further aid for a specified period of time. The University will consider each incident on an individual basis and will take into account the severity of the behavior, a student's past disciplinary record, and the specific incident's impact on the community. The hearing officer may increase the severity of the sanctions issued and any use that leads to high risk behavior will be subject to additional sanctions. Students should refer to the Student Handbook to review a list of the educational, administrative, and restrictive sanctions that can be issued due to a policy violation.

Health Risks of Substance Use

SUBSTANCE	ACUTE EFFECTS	LONG TERM EFFECTS
MARIJUANA (cannabis)	Heightened sensory perception; euphoria, followed by drowsiness/relaxation; impaired short-term memory, attention, judgment, coordination and balance; increased heart rate; increased appetite	Cough; frequent respiratory infections; possible mental health decline; addiction
COCAINE	Increased body temperature, heart rate, and blood pressure; euphoria; increased energy, alertness; nausea; decreased appetite and sleep	Addiction; restlessness, anxiety, irritability, paranoia, panic attacks, mood disturbances; insomnia; GI problems; HIV
METHAMPHETAMINE	Enhanced mood; increased heart rate, blood pressure, body temperature, energy and activity; decrease appetite; dry mouth; increased sexuality	Addiction, memory loss; weight loss; impaired cognition; anxiety, insomnia; mood disturbances; hallucinations; severe dental problems; cardiac and neurological damage
MDMA (ecstasy/Molly)	Euphoria; increased energy, alertness, tactile sensitivity, empathy; decreased fear, anxiety; increased/irregular heartbeat; dehydration; chills; sweating; teeth grinding/clenching; hyperthermia	Addiction; sleep disturbances; depression; irritability; impaired memory
HEROIN	Euphoria; warm flushing of skin; dry mouth; heavy feeling in extremities; impaired coordination; dizziness; clouded thinking; nausea; depressed respiration	Addiction; physical dependence; constipation; collapsed veins; HIV; hepatitis
NICOTINE	Increased blood pressure and heart rate	Addiction; chronic lung disease; cardiovascular disease; increased risk of certain types of cancer; stroke
ANABOLIC STEROIDS	No intoxication effects	Hypertension; blood clotting and cholesterol changes; liver cysts; hostility and aggression; acne
ALCOHOL	Low doses – euphoria; mild stimulation; relaxation; lowered inhibitions. Higher doses – slurred speech; drowsiness; nausea; loss of coordination; visual distortions; impaired memory; loss of consciousness	Addiction; liver and heart disease; increased risk of injuries, violence; depression; hypertension; fatal overdose

Bryant University considers the health and safety of the individual and community to be of upmost priority and has various on and off campus resources available for someone experiencing substance use and abuse concerns.

On-Campus Resources

- **Bryant University Counseling Services** – (401) 232-6405
- **Bryant University Health Services** – (401) 232-6220
- **BASICS (Brief Alcohol Screening and Intervention for College Students)** – Office of Health Promotion – (401) 232-6982
- **Campus Ministries** – (401) 232-6119

Off-Campus Resources

- **Jeffrey Noll** – 132 Old River Road #205, Lincoln, RI – (401) 722-1722
- **Rob Whitman-Raymond, CAS, LICSW** – 100 Lafayette Street Pawtucket, RI – (401) 729-7541
- **Adcare** – 400 Bald Hill Road, Warwick, RI – (401) 732-1500
- **Employee Assistance Program** – Coastline EAP – www.coastlineeap.com

Substance abuse is a problem that poses a serious threat to employees and students. The use of alcohol and illegal drugs endangers the health and safety of the abusers and all others around them. Bryant University is committed to making a good-faith effort in creating and maintaining a drug-free work place.

Security Policies

Bryant University has a fully-staffed and well-trained public safety department that monitors security activities 24 hours a day. The Department of Public Safety (DPS) patrols the campus on foot, on bicycle, and in a patrol vehicle, and is comprised of 20 uniformed patrol officers, a public safety assistant, and three administrators.

Bryant University is situated in a quiet residential area and has only one entrance and exit monitored by an entry control station staffed by the Department of Public Safety and facilitated by a strict guest pass policy. There are security cameras in various buildings and throughout campus that monitor pedestrian traffic and have the capability to record unusual activities.

Although Bryant University maintains adequate campus lighting at night, escorts are furnished upon request to any part of the campus. Bryant also maintains its own fully-equipped lock and key shop operated by a locksmith who monitors a strict lock and key program and responds quickly to facility repairs. All external

doors on housing units are equipped with electronic access control. Those systems are augmented by the conventional lock and key system in the interior of the buildings. All non-housing buildings have either electronic access control or traditional lock and key systems.

DPS is committed to an ongoing communication with the student body, and provides orientation information as well as other crime prevention programs throughout the year upon request. Resident Assistant (RA) training in fire and safety, crime prevention, emergency response, housing security, reporting, and other areas is facilitated by DPS.

Bryant University also maintains a Health Services Office staffed by trained professionals who provide a full range of health services. Their work is augmented by the Emergency Medical Technician (EMT) program facilitated through DPS. DPS can summon EMT services 24 hours a day and has a direct telephone line to the Smithfield Fire Department in the event that a rescue unit is needed.

The Bryant University fire safety coordinator monitors residence halls and work areas to ensure compliance with fire codes. The coordinator regularly inspects all campus buildings for fire violations and conducts two (2) fire drills per academic semester.

Bryant University Department of Public Safety officers are not sworn officers and do not possess arrest powers. However, within the jurisdictional boundaries of the campus they have the inherent right and authority to detain persons for wrongdoing. They may restrain persons who create a disorder, or refuse admittance to the campus or ask persons to leave who become disorderly or violate Rhode Island laws or campus rules or regulations or demonstrate improper behavior. The university has a close working relationship with the local and State police departments and each cooperates in attempting to maintain a secure campus. Bryant University encourages its community to quickly report the incidence of crime, and DPS promptly relays accurate information to the local police agency.

The Department of Public Safety is a member of and active participant in the Rhode Island Public Safety Directors Association, the Northeast Colleges and Universities Security Association, and the International Association of Campus Law Enforcement Administrators. These groups provide assistance and insight into changing security trends and offer information about all areas of security operations on campuses.

Reporting Crime

Community members, students, faculty, staff, and guests are encouraged to report all crimes and public safety related incidents to the Department of Public Safety in a timely manner. To report a crime or emergency occurring on campus, dial

6911 from any University telephone, or (401) 232-6911 from a phone outside of the University system. To report a non-emergency or public safety related matter, dial 6001, or (401) 232-6001 from a phone outside of the University system. Reports may also be made in person by visiting the Department of Public Safety offices in the Unistrustructure or the Entry Control Station. These offices are staffed 24 hours per day, 365 days per year. Upon receipt of a report of a crime, dispatchers will take the required action which may include sending an officer to the scene and requesting the response of the Smithfield or State Police.

Memorandum of Understanding (MOU)

The Department of Public Safety is comprised of non-sworn officers who do not have arrest powers under Rhode Island law. The Smithfield Police (SPD) and the Rhode Island State Police (RISP) are the two law enforcement agencies having jurisdiction over the Bryant University campus. Although there is no formal written memorandum of understanding directing how criminal investigations will occur on campus, the Smithfield Police, Rhode Island State Police and the Bryant University Department of Public Safety work collaboratively to investigate such incidents. In a coordinated manner the different agencies leverage their unique resources to investigate crimes on campus. Local and state law enforcement has greater geographic jurisdiction than the campus. As such, they are helpful in investigating incidents that extend beyond the campus jurisdiction.

Voluntary Confidential Reporting

If the victim of a crime does not want to pursue action through the criminal justice system or through the University’s judicial process, that person still has the option of making a confidential report. With the victim’s permission, the Director of Public Safety, or designee can file a report capturing the details of the incident without revealing the victim’s identity. The purpose of this type of report is to honor the victim’s wish to keep the matter confidential while, at the same time, taking steps to ensure the future safety of the victim and others. With such information, the University can keep an accurate record of the number of incidents involving students, employees, and visitors; determine if there is a particular pattern of crime with regard to location, method, assailant; alert the campus community to potential danger. Any reports filed in this manner would be disclosed in the annual crime statistics for the University.

Campus Sexual Assault Policies

Policy Prohibiting Title IX Sex Discrimination

I. Statement of Purpose

Bryant University (“Bryant” or “the University”) is committed to maintaining

and promoting a safe working and learning environment which promotes respect for the individual and support for academic freedom, where all members of the Bryant community can work and learn in an atmosphere that is free from all forms of discrimination.

As a recipient of federal financial assistance, Bryant is subject to Title IX of the Education Amendments of 1972 (“Title IX”), 20 U.S.C. § 1681 et. seq., which prohibits discrimination on the basis of sex within the University’s education program or activity (herein referred to as either “Sex Discrimination” or “Prohibited Conduct”). This Title IX Sex Discrimination Policy (“Policy”) addresses Bryant’s obligation to prevent and remedy Sex Discrimination within its education program or activity. This Policy should be read in conjunction with Bryant’s related Title IX Procedures (“Title IX Procedures”), which delineate the University’s responsive actions upon its knowledge of alleged Sex Discrimination and its prompt and equitable grievance procedures to investigate and resolve complaints alleging Sex Discrimination.

Bryant has updated this Policy and its Title IX Procedures to comply with the United States Department of Education Office for Civil Rights’ regulations implementing Title IX (“Title IX Regulations”), as published at 34 Code of Federal Regulations (CFR) Part 99 and as amended effective August 1, 2024. If any provision within this Policy or the Title IX Procedures contradict or fail to enforce fully the Title IX Regulations’ requirements, the Title IX Regulations will supersede and control to clarify or correct any such contradiction.

Consistent with the Title IX Regulations, the scope of Prohibited Conduct under this Policy and addressed under the Title IX Procedures includes all Sex Discrimination in its education program or activity, including all discrimination on the basis of sex stereotypes, sex characteristics, pregnancy or related conditions, sexual orientation, and gender identity.

This Policy applies to all Bryant students (graduate and undergraduate), all full and part-time employees (including administration, faculty and staff), and third parties (such as contractors, guests, vendors, visitors or volunteers). All persons who violate this policy are subject to sanctions and discipline up to and including expulsion from the University, termination of employment, or termination of a contractual or other relationship with the University.

Bryant’s prohibition against Sex Discrimination is an integral part of the University’s comprehensive prohibition against all forms of unlawful discrimination, such as discrimination on the basis of race, color, national or ethnic origin, disability, age, genetic information, marital status, or protected veteran status. Bryant’s comprehensive commitment to non-discrimination in its programs or activities applies to admissions, financial aid, academic matters, career services, counseling, housing, employment policies, scholarship programs, medical services, all forms of study abroad programs, and all other programs and activities available at Bryant.

This Policy and the Title IX Procedures do not substitute for or supersede related civil and criminal laws. The University encourages all individuals to consider their options to report incidents and violations to law enforcement officials and agencies with appropriate jurisdiction and to avail themselves of all of the supportive services and rights to which they are entitled.

Anyone who has any information about Sex Discrimination within Bryant's education program or activity should report fully and promptly all known information to the University's Title IX Coordinator (whose contact information is provided below), any designated Deputy Title IX Coordinators (as published on Bryant's Title IX webpage), or to the Department of Public Safety (whose contact information is provided below). Also, as stated herein, the University prescribes that certain employees are mandatory reporters, who must promptly notify the Title IX Coordinator upon their knowledge of alleged Sex Discrimination with Bryant's education program or activity. The University encourages all individuals to report allegations of Sex Discrimination and file complaints fully and promptly in order to capture and preserve relevant evidence. A delay in reporting may compromise the subsequent investigation, whether conducted by law enforcement and/or under the University's grievance procedures. Also, by reporting in a timely manner the University will be able to provide all persons involved with information regarding their rights, options, and available supportive resources.

This Policy and the Title IX Procedures should be read in conjunction with Bryant's Student Handbook (including its Student Code of Conduct), Employment Handbook, Fraternalization Policy, and other applicable codes and policies prohibiting discrimination and harassment, as well as the University's collective bargaining agreements. Bryant reserves the right to address, respond to, and remedy all forms of prohibited conduct under all applicable University policies, procedures and/or collective bargaining agreements.

Concerns about Bryant's implementation of its Title IX policies and procedures or adherence to its Title IX responsibilities may be addressed to any of the following governmental authorities:

United States Department of Education, Office for Civil Rights

8th Floor

5 Post Office Square Boston, MA 02109-3921

Telephone: (617) 289-0111

Telephone: (800) 421-3481

Facsimile: (617) 289-0150

Email: OCR.Boston@ed.gov

United States Equal Opportunity Commission

John F. Kennedy Federal Building 475 Government Center

Boston, MA 02203

Telephone: (800) 669-4000

Facsimile: (617) 565-3196

Rhode Island Commission for Human Rights

180 Westminster Street,
3rd Floor Providence, RI 02903
Telephone: (401) 222-2661
Facsimile: (401) 222-1616
Email: RICHR.Info@richr.ri.gov

I. The Title IX Coordinator

Bryant's Title IX Coordinator is the University's designated and authorized administrator with the responsibility to coordinate Bryant's compliance with its responsibilities under Title IX and the Title IX Regulations. The following administrator serves as Bryant's Title IX Coordinator and may be contacted as follows:

Michelle Harris, J.D.
Title IX Coordinator
Student Affairs-Bryant University
1150 Douglas Pike
Smithfield, RI 02917
Mharris11@bryant.edu
(401) 232-6105

The Title IX Coordinator may also be contacted at the following electronic address: titleix@bryant.edu.

Information about Bryant's Title IX policies, procedures and resources may be found on the University's Title IX webpage: <https://www.bryant.edu/about-bryant/title-ix-and-clery-act-information>

Reports or inquiries may be made to the Title IX Coordinator at any time (including during non-business hours, weekends, or University holidays) by using the above listed telephone number and email addresses, or by mail or hand-delivery to the above-stated address.

References to the Title IX Coordinator include any individual(s) designated as a Deputy Title IX Coordinator (whose identities, responsibilities, and contact information will be updated and published on Bryant's Title IX webpage). Additionally, references to the Title IX Coordinator may include any other designee appointed under this Policy or the Title IX Procedures, whose identity, responsibilities, and contact information will be provided to the parties. Any Deputy Title IX Coordinator or designee must be properly trained regarding their respective roles in furtherance of the University's Title IX compliance. The appointment of a Deputy Title IX Coordinator or assignment of a responsibility to a designee does not amend the Title IX Coordinator's overall responsibility for

coordinating Bryant’s Title IX compliance in its education program or activity.

Among the Title IX Coordinator’s responsibilities to ensure the University’s Title IX Compliance, the Title IX Coordinator will perform the following tasks:

- Support all community members in response to any inquiries about prohibited Sex Discrimination, including the evaluation and maintenance of appropriate supportive measures and resources;
- Ensure that Bryant’s policies and procedures effectuate prompt and equitable resolutions to reports and complaints of alleged Sex Discrimination, including all steps necessary to ensure the continuation of equal access to the University’s education program or activity;
- Periodically review (at least annually) the University’s policies and procedures to ensure that they adhere to all legal obligations under Title IX, particularly those required under the Title IX Regulations, and effectively allow Bryant to respond to and remedy any Sex Discrimination within its education program or activity;
- Track and monitor Sex Discrimination allegations involving Bryant community members;
- Ensure that Bryant’s training, education, and prevention with respect to Sex Discrimination adhere to the Title IX Regulations, including all required training of employees; and
- Provide for mandatory training of all individuals implementing Bryant’s grievance procedures, as prescribed under the University’s Title IX Procedures, including the Title IX Coordinator, investigators, decisionmakers, facilitators of informal resolution process, and appellate officers.

I. Bryant’s Title IX Education Program or Activity

Title IX prescribes that “[n]o person, in the United States, shall 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.” 20 U.S.C. § 1681(a) (italics and bold print added). Under Title IX, Bryant’s “education program or activity” includes all of the University’s operations. 20 U.S.C. § 1687.

Title IX’s jurisdictional scope does not always draw a strict line between on-campus, off-campus, or online conduct, events, or activities. To determine whether Title IX applies, the focus concerns whether any Sex Discrimination has occurred or is occurring against a person in the United States within Bryant’s education program or activity. Beyond the University’s campus, Bryant’s education program or activity may include University-sponsored, funded or otherwise supported events or programs such as internships or mentorships. Whether Sex Discrimination has occurred or is occurring within Bryant’s

education program or activity may require a fact-specific determination based upon the totality of the applicable facts and circumstances, which Bryant shall evaluate carefully to ensure its Title IX compliance to the fullest extent.

Particularly, Prohibited Conduct that has occurred or is occurring outside of the United States (e.g., in an international program) or outside of Bryant's education program or activity (e.g., at a non-University owned or controlled location) could nonetheless be subject to this Policy and the Related Title IX Procedures, if the effects of such conduct effectuates or contributes to Sex Discrimination (e.g., a hostile educational environment) in Bryant's education program or activity.

In limited circumstances in which Title IX and/or the Title IX Regulations permit different treatment or separation on the basis of sex within Bryant's education program or activity, the University must not carry out such different treatment or separation in a manner that discriminates on the basis of sex by subjecting a person to more than de minimis harm, except as permitted by Title IX under 20 U.S.C. § 1681(a)(1)-(9) and its corresponding provisions under the Title IX Regulations 34 CFR §§ 106.12-106.15, or by Title IX under 20 U.S.C. § 1686 and its corresponding provisions under the Title IX Regulations, 34 CFR § 106.32(b)(1) or § 106.41.

In addition to its prohibitions against Sex Discrimination prohibited under Title IX, Bryant has the institutional authority to address and remedy all forms of gender-based discrimination, harassment, or inter-personal violence (such as sexual exploitation or nonconsensual sexual contact) prohibited by any of its policies, procedures, or community standards. If any alleged conduct falls outside of Title IX's jurisdictional scope (e.g., outside of Bryant's education program or activity) or definitional scope (e.g., does not meet the requirements that constitute Sex Discrimination as defined by Title IX and the Title IX Regulations), the University may address, remedy, and/or discipline all such conduct under all other applicable University policies, procedures, and agreements, including but not limited to Bryant's Student Handbook, Human Resource Department policies, or any collective bargaining agreement. Bryant will maintain and enforce its community standards to the fullest extent under all of its applicable policies, procedures, or collective bargaining agreements.

II. Prohibited Conduct

A. Sex Discrimination: Sex Discrimination is prohibited under Title IX and Bryant's Title IX policies and procedures. Under Title IX, Sex Discrimination is discrimination on the basis of an individual's sex, including discrimination based upon sex stereotypes, sex characteristics, pregnancy or related conditions, sexual orientation, and gender identity. Prohibited Sex Discrimination includes Sex-Based Harassment. All references to Sex Discrimination within this Title IX Policy and Bryant's related Title IX Procedures include prohibited Sex-Based Harassment, as defined below.

B. Sex-Based Harassment: Sex-Based Harassment is a form of prohibited Sex Discrimination, which entails sexual harassment and other harassment on the basis of sex, including harassment on the basis of sex stereotypes, sex characteristics, pregnancy or related conditions, sexual orientation, and gender identity. Sex-Based Harassment may entail conduct under one or more of the following categories: (1) Quid Pro Quo Harassment; (2) Hostile Environment Harassment; and/or (3) Sex-Based Crimes (Sexual Assault, Dating Violence, Domestic Violence, or Stalking).

1. Quid Pro Quo Harassment occurs when a Bryant employee, agent, or other person authorized by the University to provide an aid, benefit, or service under Bryant's education or activity explicitly or impliedly conditions the provision of an aid, benefit, or service on an individual's participation in unwelcome sexual conduct.

2. Hostile Environment Harassment occurs when unwelcome sex-based conduct that, based on the totality of the circumstances, is subjectively and objectively offensive and so severe or pervasive that it limits or denies a person's ability to participate in or benefit from Bryant's education program or activity (i.e., creates a hostile environment). Whether a hostile environment has been created is a fact-specific inquiry that includes the University's consideration of the following factors:

- a. The degree to which the conduct affected an individual's ability to access Bryant's education program or activity;
- b. The type, frequency, and duration of the conduct;
- c. The parties' ages, roles within Bryant's education program or activity, previous interactions, and other factors about each party that may be relevant to evaluating the effects of the conduct;
- d. The location of the conduct and the context in which the conduct occurred; and
- e. Other Sex-Based Harassment in Bryant's education program or activity.

3. Sex-Based Crime means an offense classified as a forcible or non-consensual sex offense under the uniform crime reporting system of the Federal Bureau of Investigation. A Sex-Based Crime includes conduct constituting any one of the four offenses: Sexual Assault (20 U.S.C. § 1092(f)(6)(A)(v)), Dating Violence (20 U.S.C. § 12291(a)(10)), Domestic Violence (34 U.S.C. § 12291(a)(8)), and Stalking (34 U.S.C. § 12291(a)(30)).

a. Sexual Assault is a sexual act directed against another person, by force, threat of force, coercion, or without consent, including instances where the person is incapable of giving consent. Sexual Assault includes the offenses of Rape, Sodomy, Sexual Assault with an Object, Fondling, Incest, and Statutory Rape.

i. Rape: The carnal knowledge of a person, without consent of the victim, including instances where the victim is incapable of giving consent because of their age or because of their temporary or permanent mental or physical incapacity.

ii. Sodomy: Oral or anal sexual intercourse with another person, without the consent of the victim, including instances where the victim is incapable of giving consent because of their age or because of their temporary or permanent mental or physical incapacity.

iii. Sexual Assault with an Object: To use an object or instrument to unlawfully penetrate, however slightly, the genital or anal opening of the body of another person, without the consent of the victim, including instances where the victim is incapable of giving consent because of their age or because of their temporary or permanent mental or physical incapacity.

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

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

vi. Statutory Rape: Non-forcible sexual intercourse with a person who is under the age of statutory age of consent (age 16 in Rhode Island).

b. Dating Violence: Dating Violence is violence committed by a person who is or has been in a social relationship of a romantic or intimate nature with the victim. Dating violence includes, but is not limited to, sexual or physical abuse or the threat of such abuse. The existence of the relationship shall be determined based on a consideration of the following factors: the length of the relationship, the type of relationship, and the frequency of interaction between the persons involved in the relationship.

c. Domestic Violence: Domestic Violence includes felony or misdemeanor crimes committed by a current or former spouse or intimate partner of the victim or a person similarly situated to a spouse of the victim, by a person who is cohabitating, or has cohabitated, with the victim as a spouse or intimate partner, by a person who shares a child in common with the victim, or by a person who commits acts against a youth or adult victim who is protected under family or domestic violence laws of the jurisdiction. All forms of domestic violence prohibited by Rhode Island law are also included.

d. Stalking: Stalking occurs when a person engages in a course of conduct directed at a specific person under circumstances that would cause a reasonable person to fear for their own safety or the safety of others or suffer

substantial emotional distress. Course of conduct means two or more instances including but not limited to unwelcome acts in which an individual directly, indirectly, or through third parties, by any action, method, device, or means, follows, monitors, observes, surveils, threatens or communicates to or about a person, or interferes with a person's property. Substantial emotional distress means significant mental suffering or anguish. Stalking includes the concept of cyber-stalking, a particular form of stalking in which electronic media such as the internet, social networks, blogs, cell phones, texts, or similar devices or forms of contact are used.

C. Provision of Alcohol and/or Other Drugs for Purposes of Prohibited

Conduct: The provision of alcohol and/or drugs to an individual for the purpose of committing or facilitating Prohibited Conduct is also in and of itself Prohibited Conduct. Such behavior may include provision of a drink or food which contains alcohol and/or drugs without the knowledge of the individual to whom it is being provided or other actions taken with the intention of impairing senses, judgment, and/or physical and mental ability of another person. An individual does not have to engage in sexual activity with another person to be found responsible for the prohibited provision of alcohol and/or other drugs.

D. Retaliation: Retaliation is any action, intimidation, threat, coercion or discrimination against an individual in response to the individual's good-faith report or participation in a proceeding related to this policy. Any retaliatory action taken directly against a person who has made a report, filed a complaint, or participated in an investigation or hearing is strictly prohibited. Retaliation can include, but is not limited to, intimidation, direct or indirect threats, harassment, use of social media to ridicule, insult or bully, and other conduct that would discourage a reasonable person from engaging in any activity protected under this policy, such as seeking services, receiving protective measures and accommodations, and/or reporting Prohibited Conduct. Retaliatory actions include, but are not limited to, threats or actual violence against the person or their property, adverse educational or employment consequences, ridicule, intimidation, bullying or ostracism. This prohibition against retaliation protects parties and witnesses to Bryant's Title IX grievance procedures.

E. Making a Materially False Statement in Bad Faith: Members of the University's community are expected to provide truthful information in any report, meeting or proceeding relating to this Policy and the University's Title IX Procedures. Providing or submitting false or misleading information in bad faith, with a motive to obtain personal advantage or to cause intentional harm to another person in connection with an incident of sex discrimination and/or harassment is prohibited, and the individual is subject to disciplinary sanctions under the relevant disciplinary system. This provision does not apply to reports made or information provided in good faith, even if the facts claimed are ultimately not substantiated. A determination regarding responsibility, alone, is insufficient to conclude that any party violated this provision.

III. Definitions Related to Prohibited Conduct

A. Consent: Consent is a clear, informed and voluntary agreement to engage in sexual activity. Consent requires an outward demonstration, through understandable words or behavior, that conveys a clear willingness to engage in sexual activity. Consent to one type of sexual activity does not equal consent to other types of sexual activity. Consent can be withdrawn at any point during sexual activity and the sexual activity must stop immediately. A verbal “no” establishes lack of consent. Silence, without clear actions demonstrating permission, cannot be assumed to indicate consent – the absence of “no” does not equal “yes.” Consent cannot be obtained by coercion, threat or force.

Consent cannot be given by someone if they are mentally or physically incapacitated. Engaging in sexual activity with a person whom you know - or reasonably should know - to be incapacitated constitutes sex harassment. A person also is incapable of giving valid consent to sexual activity if they are under the legal age of consent (age 16 in Rhode Island).

Although consent does not need to be verbal, verbal communication is the most reliable form of asking for and gauging consent. Talking with sexual partners about desires and limits may seem awkward, but serves as the basis for positive sexual experiences shaped by mutual willingness and respect. Presumptions based upon contextual factors (such as clothing, alcohol consumption, or dancing) are unwarranted and do not constitute evidence of consent.

B. Incapacitation: Incapacitation is a state where an individual is temporarily or permanently impaired to the extent where that person can no longer make a rational and informed decision to consent to sexual activity. Incapacitation may be caused by mental or physical disability, or when a person has consumed alcohol or other drugs, including prescribed medication. Individuals who are asleep or unconscious are incapacitated. A person who does not comprehend the “who, what, when, where, why, or how” of a sexual interaction may be incapacitated. Evidence of incapacitation may include, but is not limited to, stumbling or shaky equilibrium, vomiting, slurred speech, bloodshot eyes, smell of alcohol, outrageous or unusual behavior, or unconsciousness (for short or long periods of time).

Where alcohol or other drugs are involved, evaluating incapacitation requires an assessment of how the consumption of alcohol and/or drugs affects a person’s decision-making ability; awareness of consequences; ability to make informed, rational judgments; capacity to appreciate the nature and quality of the act; or level of consciousness. The assessment is based on objectively and reasonably apparent indications of incapacitation when viewed from the perspective of a sober, reasonable person.

Further, the accused may not assert his or her own diminished capacity due to drug or alcohol usage as a defense to the reported allegations or resulting charges.

C. Coercion: Coercion is verbal and/or physical conduct, including intimidation, unwanted contact, and express or implied threats of physical, emotional, or other harm, that would reasonably place an individual in fear of immediate or future harm and/or that is employed to compel someone to engage in sexual contact.

D. Force: Force is the use of physical violence and/or imposing on someone physically to gain sexual access. Force can include intimidation or implied threats to overcome an individual's resistance or produce consent. There is no requirement that a party resist the sexual advance or request, but resistance is a clear demonstration of non-consent.

E. Intimidation: Intimidation is defined as overt or implied threats or acts that would cause reasonable fear of harm in another.

IV. Key Definitions

The following definitions aid in the interpretation of this Policy, which should be read in conjunction with and applied consistently with the definitions stated in the Title IX Procedures.

A. Complainant: The Complainant is an individual who is (a) a student or employee who is alleged to have been subjected to conduct that could constitute Sex Discrimination or (b) a person other than a student or employee who is alleged to have been subjected to conduct that could constitute Sex Discrimination and was participating or attempting to participate in Bryant's education program or activity at the time of the alleged Sex Discrimination.

B. Confidential Employee: A confidential employee means:

1. A Bryant employee whose communications are privileged or confidential under federal or state law. The employee's confidential status is only with respect to information received while the employee is functioning within the scope of their duties to which the privilege or confidentiality applies;
2. A Bryant employee whom the University has designated as confidential under this Policy or another applicable policy for the purpose of providing services to persons related to Sex Discrimination. If the employee also has a duty not associated with providing those services, the employee's confidential status is only with respect to information received about Sex Discrimination in connection with providing those services; or
3. A Bryant employee who is conducting an Institutional Review Board-approved human-subjects research study designed to gather information about Sex Discrimination – but the employee's confidential status is only with respect to information received while conducting the study.

C. Parental Status: For purpose of the Policy's protections based upon parental status, the term refers to the status of a person who, with respect to another

person who is under the age of 18 or who is 18 or older but is incapable of self-care because of physical or mental disability, is (1) a biological parent; (2) an adoptive parent; (3) a foster parent; (4) a stepparent; (5) a legal custodial or guardian; (6) in loco parentis with respect to such person; or (7) actively seeking legal custody, guardianship, visitation, or adoption of such person.

D. Pregnancy and Related Conditions: The scope and meaning of the term “Pregnancy and Related Conditions” entails the following:

1. Pregnancy, childbirth, termination of pregnancy, or lactation;
2. Medical conditions related to pregnancy, childbirth, termination of pregnancy, or lactation; or
3. Recovery from pregnancy, childbirth, termination of pregnancy, lactation, or related medical conditions.

E. Respondent: The Respondent is an individual who is alleged to have violated Bryant’s prohibitions against Sex Discrimination.

F. Supportive Measures: Supportive Measures are non-disciplinary, non-punitive individualized services and accommodations offered, as appropriate and reasonably available, and without fee or charge, that are designed to restore or preserve equal access to the University’s education program or activity without unreasonably burdening the Complainant or the Respondent, including measures designed to protect the safety of persons impacted by a report or the University’s community, or to deter Sex Discrimination, as well as provide support during the grievance procedures or during an informal resolution process.

Examples of Supportive Measures include, but are not limited to: counseling; extensions of deadlines and other course-related adjustment; campus escort services; increased security and monitoring of certain areas of campus; restrictions on contact applied to one or more parties; leaves of absence; changes in class, work, housing, or extracurricular or other activity, regardless of whether or not there is a comparable alternative; counseling, and training and education programs. Supportive Measures may vary based upon what Bryant deems to be reasonably available.

As coordinated by Bryant’s Title IX Coordinator, Supportive Measures will be offered and provided equitably to the Complainant and Respondent, as circumstances reasonably permit. Bryant will maintain as confidential any Supportive Measures provided to the Complainant and Respondent to the extent that maintaining such confidentiality would not impair the University’s ability to provide the Supportive Measures.

V. The University’s Fraternization Policy

Except under specifically prescribed and limited exemptions, Bryant strictly

prohibits any non-student community member from engaging in a romantic or sexual relationship with an enrolled student. The University's prohibition against such intimate relationships is stated in its Fraternalization Policy. The Fraternalization Policy may be enforced separately or concurrently with this Policy as circumstances prescribe.

VI. Protections to Students Based on Parental, Family, or Marital Status; Pregnancy or Related Conditions

The Title IX Coordinator will apply the following protections under Title IX and this Policy in coordination with the appropriate deans and administrators responsible for academic affairs and/or student life matters.

A. Status Generally: Bryant will not adopt or implement any policy, practice, or procedure concerning a student's current, potential, or past parental, family, or marital status that treats students differently on the basis of sex.

B. Pregnancy or Related Conditions:

1. Nondiscrimination: Bryant will not discriminate in its education program or activity against a student based on the student's current, potential, or past Pregnancy or Related Conditions. Bryant may allow a student, based on Pregnancy or Related Conditions, to voluntarily participate in a separate portion of its education program or activity that is comparable to students who are not pregnant or have related conditions.

2. Responsibility to Provide Title IX Coordinator Contact and Other Information: When a student, or a person who has the legal authority to act on the student's behalf, informs any Bryant employee of the student's Pregnancy or Related Conditions, unless the employee believes that the Title IX Coordinator has been notified, the employee should promptly provide the student or the authorized person with the Title IX Coordinator's contact information in order to facilitate the protection against Sex Discrimination and ensure the student's equal access to Bryant's education program or activity.

3. Actions to Prevent Sex Discrimination and Ensure Equal Access: Upon knowledge or notification of a student's Pregnancy or Related Conditions, the Title IX Coordinator must coordinate the following actions:

a. Information About Bryant's Obligations: Bryant will inform the student, and if applicable, the person who notified the Title IX Coordinator of the student's Pregnancy or Related Conditions and has a legal right to act on the student's behalf, of all of Bryant's obligations under this section and provide a copy of Bryant's notice of nondiscrimination.

b. Reasonable Modifications: Bryant must make reasonable modifications based upon a student's individual needs, which shall be assessed in consultation with the student. A modification that would fundamentally alter the nature of Bryant's education program or activity is not a reasonable

modification. The student has the discretion to accept or decline each reasonable modification offered by Bryant. If the student accepts the reasonable modification, Bryant will implement it.

Reasonable modifications may include, but are not limited to, breaks during class to express breast milk, breastfeed, or attend to health needs associated with Pregnancy or Related Conditions, including eating, drinking, or using the restroom; intermittent absences to attend to medical appointments; access to online or homebound education; changes in schedule or course sequence; extensions of time for coursework and rescheduling of tests and examinations; allowing a student to sit or stand, or carry or keep water nearby; counseling; changes in physical space or supplies (for example, access to a larger desk or a footrest); elevator access; or other changes to policies, practices, or procedures that would not fundamentally alter Bryant's education program or activity.

c. Voluntary Leaves of Absence: Bryant will allow the student to voluntarily take a leave of absence from its education program or activity to cover, at a minimum, the period of time deemed necessary by the student's licensed healthcare provider. Student leaves of absence shall be administered consistent with Bryant's student policies.

d. Lactation Space: Bryant will allow the student to access a lactation space, which will not be a bathroom, that is clean, shielded from view, free from intrusion of others, and may be used by the student for expressing breast milk or breastfeeding as needed.

4. Limitation on Supporting Documentation: Bryant will not require supporting documentations in regarding any of the above-stated actions, unless the documentation is necessary and reasonable for the University to determine the reasonable accommodations to make or whether to take any additional specific actions.

5. Certification to Participate: Bryant will not require a student who is pregnant or has related conditions to provide a certification from a healthcare provider or any other person that the student is physically able to participate in a class, program, or extracurricular activity, unless (i) the certified level of physical ability or health is necessary for participation, (ii) Bryant requires such certification of all students participating in the class, program, or extracurricular activity; and (iii) the information will not be used for any discriminatory purpose.

VII. Protections for Employees Based on Parental, Family, or Marital Status; Pregnancy or Related Conditions

Bryant will apply the following protections under Title IX and this Policy, concurrent and consistently with its applicable Human Resources Policies and Procedures relating to employees and applicants for employment. The Title IX Coordinator shall facilitate Bryant's compliance with the following provisions in

coordination with the Vice President of Human Resources or a designee.

A. Status Generally: Bryant will not adopt or implement any policy, practice, or procedure or take any employment action, on the basis of sex:

1. Concerning the current, potential, or past parental, family, or marital status of an employee or applicant of employment, which treats persons differently, or
2. That is based upon whether an employee or applicant for employment is the head of household or principal wage earner in such employee's or applicant's family unit.

B. Pregnancy or Related Conditions: Bryant will not discriminate against any employee or applicant for employment on the basis of current, potential, or past pregnancy or related conditions.

C. Comparable Treatment of Temporary Medical Conditions: Bryant will treat pregnancy or related conditions as any other temporary medical conditions for all job-related purposes, including commencement, duration and extensions of leave; payment of disability income; accrual of seniority and any other benefit or service; and reinstatement; and under any fringe benefit offered to employees by virtue of employment.

D. Voluntary Leaves of Absence: In the case of an employee with insufficient leave or accrued employment time to qualify for leave under Bryant's leave of absence policies, Bryant will treat Pregnancy or Related Conditions as a justification for a voluntary leave of absence without pay for a reasonable period of time, at the conclusion of which the employee shall be reinstated to the status held when the leave began or a comparable position, without decrease in rate of compensation or loss of promotional opportunities, or any other right or privilege of employment.

E. Lactation Time and Space: Consistent with its Human Resources policies, Bryant will provide reasonable break time for an employee to express breast milk or breastfeed as needed. Bryant will ensure that the employee can access a lactation space, which will be a space other than a bathroom that is clean, shielded from view, free from intrusion of others, and may be used by an employee for expressing breast milk or breast feeding as needed.

VIII. Mandatory Reporters

Taking meaningful and prompt action when Sex Discrimination occurs is a critical component of Bryant's commitment to the health and safety of its community. Designating employees as a Mandatory Reporter enhances the University's ability to know promptly what is occurring within its programs or activities and to respond promptly, equitably, and accordingly.

For purposes of this policy, a Mandatory Reporter is a University employee who

has a duty to promptly notify the Title IX Coordinator of all known details of alleged Prohibited Conduct involving students, faculty, staff and third-parties. The term Mandatory Reporter does not include confidential resources and anonymous reporting sources addressed in this Policy's options for reporting and assistance. Specifically, any employee, who is a Confidential Employee (as defined above), is not a Mandatory Reporter.

Mandatory Reporters include employees with the authority to institute corrective measures or are responsible for administrative leadership, teaching, or advising. Any questions about the status of an employee as a Mandatory Reporter should be addressed to the Title IX Coordinator. Bryant Employees, who are Mandatory Reporters, include the following non- exhaustive list:

- The President, Vice Presidents and Deans;
- The Provost;
- All Faculty;
- Student Affairs administrative staff (except Counseling Center, Health Services and Office of Campus Ministries staff, who are confidential sources, and First Responders and Victim Advocates, who are anonymous sources);
- Residential Life staff (Area Co-Coordinators, Associate Director, Assistant Director, Director, and Resident Assistants.);
- Peer Mentors;
- Coaches and Athletic Trainers;
- Human Resources staff members;
- Student organization faculty/staff advisors; and
- Student employees while in their capacity as an employee.

Upon receipt of the known information from a Mandatory Reporter, the Title IX Coordinator may notify the Department of Public Safety and other appropriate Bryant officials, as deemed reasonably necessary and appropriate under the circumstances.

Mandatory Reporters who learn about alleged incident(s) of Sex Discrimination (including but not limited to Sex-Based Harassment) should not promise confidentiality. Mandatory Reporters should provide to the Title IX Coordinator all relevant details known about the events, circumstances relating to the Prohibited Conduct, including:

- the person who experienced the alleged Prohibited Conduct;

- the name of the accused, if known;
- the identity of other persons or witnesses involved in or with information about the alleged Prohibited Conduct;
- details about the date, time and location of the alleged Prohibited Conduct; and
- whether the person who experienced the alleged Prohibited Conduct has requested that their name not be disclosed to the alleged perpetrator(s) or that the University not investigate or take action against the alleged perpetrator(s).

To the extent possible, information reported by a Mandatory Reporter will be shared only with people responsible for handling the University's response to the report. A Mandatory Reporter should not share information with law enforcement without the individual's consent or unless the individual has also reported the incident to law enforcement.

Any Bryant employee who is not designated as a Mandatory Reporter must either report the incident of Prohibited Conduct to the Title IX Coordinator or provide the individual who disclosed the prohibited conduct with the Title IX Coordinator's contact information, and information about how to make a complaint of discrimination.

IX. Reporting and Options for Assistance

Bryant is required to take responsive action when it has notice of potential or alleged Prohibited Conduct. Notice occurs when the Title IX Coordinator receives a report from a Complainant, or any person, alleging Prohibited Conduct. Bryant has instituted policies and training to Mandatory Reporters to share promptly and fully information about conduct that reasonably may constitute Prohibited Conduct. The University's centralized reporting requirement helps to ensure that the Complainant may receive Supportive Measures promptly upon the reporting of Prohibited Conduct, ensures that all Bryant community members have equitable access to the resolution processes (including Supportive Measures, as appropriate to the Complainant, Respondent, and witnesses during the processes), allows Bryant to take prompt and appropriate actions consistent with its Title IX obligations and educational mission, while respecting the Complainant's autonomy to the fullest extent possible.

Members of the Bryant community who believe that they or another member of the community have been or are being subjected to any form of sex discrimination and/or harassment have the right and are encouraged to report the matter to and seek assistance from the University, off-campus resources, or both.

Resources

As discussed below, some resources both on and off-campus are “confidential” and/or “anonymous” resources - i.e., persons who can offer support, advice or other services and who, as a general matter, are not required to further report, initiate an investigation, or otherwise take action in response to the information you provide. Additional resources are not confidential or anonymous.

Anonymous Resources – Anonymous reporting sources are required to report statistical information to the Title IX Coordinator. While maintaining a victim’s anonymity, these individuals must report the nature, date, time, and general location of an incident to the Title IX Coordinator or designee. Anonymous resources include the First Responders (who answer reports or inquiries on the Advocacy Helpline) and the Victim Advocate.

Confidential Resources – Confidential resources are those individuals who, by law and/or University policy, are obligated to maintain confidentiality of the disclosure of Sex Discrimination (including Sex-Based Harassment). These individuals are not required to re-disclose information shared with them other than in very extreme and unusual circumstances involving evidence of a serious and imminent threat to the individual making the report or to an identifiable third party. Confidential resources include Health Services, Counseling Services, and the Office of Campus Ministries.

Victim Advocate - A Victim Advocate works to support and assist victims of Sex-Based Harassment (including sexual assault and sexual harassment). A Victim Advocate has received training to provide advice and assistance, including but not limited to the provision of information about available options under this policy and other applicable University policies, the right to contact law enforcement, and available legal, medical or counseling support and assistance. Victim Advocates are an anonymous resource who must report date and location of the incident, but names will not be included unless with consent of the victim.

Non-confidential Resources – Non-confidential resources, particularly Mandatory Reporters, are required to report all information to the Title IX Coordinator. In all instances and to the extent possible, the University will protect the privacy of all parties to a report of sexual assault, sex-based discrimination and/or harassment, dating violence, domestic violence, stalking, and/or conduct that creates a hostile environment. That said, under federal law, campus officials (with the exception of those listed under as Confidential Employees or Confidential Resources, above) who receive a report of sexual assault, sex-based discrimination and/or harassment, dating violence, domestic violence, stalking, and/or conduct that creates a hostile environment, whether from a student or third party, must share that information with the Title IX Coordinator.

Immediate Resources On Campus

Advocacy Helpline – (401) 258-4209: A private, 24/7 support network of

Bryant staff members who are trained to assist student victims of sex-based discrimination and/or harassment. The network provides support, information, and assistance in attaining medical attention. When you get support, you do not have to pursue any specific course of action and no action will be taken unless you choose to do so.

Bryant's advocates for those who have experienced sex-based discrimination and/or harassment are housed in the Hochberg Women's Center on the 2nd floor of the Fisher Student Center.

Department of Public Safety – emergency response (401) 232-6911: Emergency response available 24 hours a day, 7 days a week. Complaints may also be directed to Public Safety's administrative number, (401) 232-6001.

Title IX Coordinator: Michelle Harris, J.D. (see full contact information above)

- **Michelle Harris, J.D.**, (401) 232-6105
- **Office of Counseling Services** (401) 232-6045: Clinicians provide confidential crisis support and follow-up appointments for Bryant students. All conversations are kept confidential within professional and legal guidelines. The following staff in the Office of Counseling Services are a confidential resource:
 - **Noelle Harris, PhD, LMHC, R.Y.T.**, Assistant Dean/Director of Counseling, Religious, and Spiritual Life;
 - **Robert A. Richards, MS, LMCH, LCDP**, Associate Director;
 - **Courtney McCarthy, MSW, LICSW**, Assistant Director;
 - **Lisa Donovan, MD**, Consulting Psychiatrist
 - **David Lockwood, M.Ed, MSW, LICSW**, Sports Psychology Counselor;
 - **LaTanya Monteiro, MS**, Senior Intercultural Counseling Specialist;
 - **Jennifer Lemieux, BA**, Practice Coordinator; and
 - **Gianella Salvaggio, Counselor MS, CTP.**
- **Health Services** (401) 232-6220: Clinicians provide on-site medical care, testing and treatment for Bryant students. All medical information and treatment are kept confidential within professional and legal guidelines. The following staff in Health Services are a confidential resource:
 - **Christine Dodd**, Co-Director, cdodd@bryant.edu;
 - **Cassandra Gaffney**, Co-Director, cgaffney2@bryant.edu;
 - **Chelsea Gould**, Certified Nurse Practitioner, cgould1@bryant.edu;

- **Laurie Anderson**, Clinical Nurse Practitioner, landerson6@bryant.edu;
- **Amy Webster**, Health Promotion Coordinator, awebster@bryant.edu;
- **Beth Williams**, Clinical Nurse Practitioner, bwilliams12@bryant.edu;
- **Cheryl Brock**, Health and Nutrition Educator, cbrock@bryant.edu;
- **Sandra Dephoure**, Health Services, Office Assistance, sdephoure@bryant.edu; and
- **Alison Plante**, Health Services, Practice Coordinator, aplante3@bryant.edu.
- **Office of Campus Ministries** (401) 232-6712: Chaplains are available for counseling and support. The following staff in the Office of Campus Ministries are a confidential resource:
 - **Rabbi Steven Jablow**, Director of Campus Ministry, (401) 232-6553, sjablow@bryant.edu;
 - **Pastor Kevin White**, Protestant Chaplain, kwhite13@bryant.edu;
 - **Chaplain Aisha Manzoor**, Muslim Chaplain, amanzoor@bryant.edu;
 - **Fr. Chris Murphy**, fatercjm@gmail.com;
 - **Fr. David Gaffney**, gaffdav@aol.com;
 - **Fr. Joseph Pescatello**, jpjr1189@gmail.com; and
 - **Fr. Brian Morris**, rev.brian.morris@gmail.com
- **Office of Residence Life** (401) 232-6140: Provides a crisis response system which includes on- call administrators.
- **Gertrude Meth Hochberg Women's Center** (401) 232-6854: Provides support, information, and education for the Bryant campus community regarding gender-related issues as well as violence prevention and advocacy services.

For Bryant Employees only: **Coastline Employee Assistance Program Hotline:**
1-800-445-1195

Immediate Resources Off-Campus:

- **Smithfield Police** (401)-231-2500 (215 Pleasant View Avenue, Smithfield, RI 02917) The Smithfield Police Department is available to help individuals affected by power-based personal violence cope with these

traumatic events, including helping to protect the safety of individuals within the University communicating and ensuring justice is served.
<http://smithfieldpd.com/sexual-assault-resources-for-bryant-university-students/>

Local Hospitals: The following hospitals offer the Safe Program with SANE (Sexual Assault Nurse Examiner) and rape kit capability:

Women and Infants Hospital: (401) 274-1100, Emergency Room

100 Dudley Street #2

Providence, RI 02905

Recommended for female individuals. Sexual Assault Nurse Examiners available

Rhode Island Hospital: (401) 444-4000, Emergency Room

593 Eddy Street

Providence, RI 02903

Recommended for male individuals.

Miriam Hospital: (401) 793-2500, Emergency Room

164 Summit Avenue

Providence, RI 02906

Recommended for transgender or gender non-binary individuals.

Options for Victims of Sexual Assault

Victims of sexual assault should call either the Department of Public Safety, the Hochberg Women's Center or the Advocacy Helpline. **The Rhode Island Sexual Assault and Domestic Violence Hotline** can also be reached at 1 (800) 494-8100. They will ensure that a trained advocate is available to assist you at the hospital and will work directly with the Hospital Staff to enlist the services of a Sexual Assault Forensic Examiner (SAFE) Nurse. The nurse can provide pregnancy tests and preventive treatment for some sexually transmitted infections (STI) free of charge.

In order to preserve evidence, it is essential to seek medical treatment immediately following a sexual assault should you wish to press charges now or at a later date. To preserve evidence of the sexual assault - do not bathe, shower, douche, eat, drink, or brush your teeth. If possible, try not to eliminate any waste. Any of these behaviors can wash away evidence. Any clothing, if not still being worn, and any bedding or fabric should be preserved and not laundered. These

items may contain forensic evidence and be useful if you decide to report the crime to law enforcement. Put them in a paper bag, not plastic.

Additional Resources for Victims of Sexual Assault

Day One: (401) 421-4100, www.dayoneri.org

100 Medway Street

Providence, RI 02906

Day One is the only agency in Rhode Island that is specifically organized to deal with issues of sexual assault as a community concern. The organization provides treatment, intervention, education, advocacy, and prevention services to Rhode Islanders of all ages.

Rhode Island Sexual Assault and Domestic Violence Hotline - 1 (800) 494-8100

A twenty-four (24) hour hotline if you need help because of sexual assault or an abusive relationship. Counselor-advocates provide support and are available to accompany victims of sexual assault to the hospital and police station. Ongoing counseling and support groups available. This hotline is specific to Rhode Island. Contact the National Sexual Assault Hotline at 1(800) 656-HOPE if you need help in another state.

Law Enforcement Options

To file a police report and/or discuss your options for pursuing a criminal complaint, contact:

- **Bryant Department of Public Safety (DPS)**, 232-6911 (emergency) or 232-6001 (administrative)
- **Smithfield Police**, 215 Pleasant View Avenue, Smithfield, RI 02917 (401)231-2500
- **RI State Police**, 311 Danielson Pike, No. Scituate, RI 02857 (401) 444-1000

Reporting Options and Confidentiality

The University encourages victims of Sex Discrimination and others who are aware of Sex Discrimination to report the matter promptly for the impacted individual to receive support and for the University to investigate and address any allegations of Sex Discrimination. The individual at all times has the right to file a criminal complaint, or not, and to pursue University disciplinary action, or not, including the right to do both simultaneously if they so choose.

The University supports the confidentiality interests of persons who report that they have been subjected to sex-based discrimination. Even if such a person does

not specifically ask for confidentiality, the University will disclose information regarding alleged incidents of sexual misconduct only to those individuals responsible for handling the University's response or otherwise have a need to know the information.

At the same time, there are situations in which the University must override a person's request for confidentiality in order to meet its legal obligations and/or to protect the safety and wellbeing of its community. However, these situations will be limited, and the information will only be shared with individuals who are responsible for handling the University's response.

On Campus Confidential and Anonymous Resources

Victims who wish to access resources and support without their names being disclosed to other University officials, or others, should contact one of the following:

Advocacy Helpline - (401) 258-4209. The Advocacy Helpline is a private 24/7 support network of Bryant staff members who are trained to assist student victims of sexual assault. The network provides support, information, and assistance in attaining medical attention. When you get support, you do not have to pursue any specific course of action and no action will be taken unless you choose to do so.

Office of Counseling Services - (401) 232-6045. Clinicians provide confidential crisis support and follow-up appointments for Bryant students. All conversations are kept confidential within professional and legal guidelines.

Health Services - (401) 232-6220. Clinicians provide on-site medical care, testing, and treatment for Bryant students. All medical information and treatment are kept confidential within professional and legal guidelines.

Office of Campus Ministries - (401) 232-6045. Chaplains are available for counseling and support and may be reached by telephone for an appointment.

Disclosures to these employees generally will not trigger a University investigation into an incident against the victim's wishes. In addition, these individuals will share only general information about the incident to the Title IX Coordinator, as required under federal law, and will not disclose information which identifies the individual except in those instances where the Title IX Coordinator determines that disclosure is necessary in order for the University to meet its legal obligations and/or to protect the safety and well-being of its community.

There are also confidential resources available off-campus. As a general matter, licensed off-campus medical providers, mental health providers, and rape crisis

counselors are prohibited from disclosing the identity of persons who seek their assistance in connection with an alleged sexual assault without that person's consent, except in very limited circumstances where there is an imminent risk of harm.

Addressing Requests for Confidentiality/Privacy or That No Action Be Taken

A person may report an incident of Prohibited Conduct to the University but request that their name not be disclosed to the alleged perpetrator(s) or that the University not investigate or take action. If an individual seeks to report an incident to a Mandatory Reporter while maintaining complete confidentiality or privacy, rather than speaking to the individual about confidential information, the Mandatory Reporter should offer to refer or accompany the impacted individual to one of the confidential or private resources listed above.

The University has an obligation to provide a safe and nondiscriminatory environment for all students, faculty and staff. Once a person reports an act of Prohibited Conduct to a Mandatory Reporter, confidentiality or privacy requests which could preclude a meaningful investigation or potential discipline of the alleged perpetrator(s) will be evaluated by the Title IX Coordinator. In evaluating the request for confidentiality/privacy or that no action be taken, the Title IX Coordinator will consider a range of factors, including but limited to, the following:

- whether circumstances suggest there is an increased risk of the alleged perpetrator committing additional acts of sexual or other violence;
- whether there have been other sexual misconduct complaints about the same accused individual;
- whether the alleged perpetrator has a history of arrests or disciplinary complaints in other settings indicating a history of violence;
- whether the alleged accused individual has threatened further sexual or other violence;
- whether the reported sexual misconduct was committed by multiple alleged accused individuals;
- circumstances that suggest there is an increased risk of future acts of sexual violence under similar circumstances;
- whether the report of sexual misconduct reveals a pattern of perpetration at a given location and/or by a particular group;
- whether the reported sexual violence was perpetrated with a weapon; and/or

- whether the University possesses other means of obtaining relevant evidence.

In cases where the balance of factors compels the University to investigate the allegation of Sex Discrimination (including Sex-Based Harassment) and pursue a grievance procedure that requires disclosing a person's identity to the alleged perpetrator(s), the person will be told in advance and the University will work with the person to maximize their safety and privacy. The University also will reiterate its non-retaliation policy with all parties.

Reporting Procedure – Child Abuse/Neglect

Rhode Island law requires that all persons must report known or suspected cases of child abuse and/or neglect, meaning the physical or mental injury, sexual abuse or exploitation, negligent treatment or maltreatment of a child under the age of eighteen (18). If an employee (faculty or staff member) suspects or observes child sexual and/or neglect abuse on campus, the employee must report it to the Rhode Island Department of Children, Youth, and Families within twenty-four hours of becoming aware of such abuse/neglect. Call the DCYF hotline at 1-800-RI-CHILD (1-800-742- 4453). In emergency situations, call 911 first.

X. Student Amnesty

The health and safety of every student at Bryant is of utmost importance. Bryant recognizes that students who have been drinking and/or using drugs (whether such use is voluntary or involuntary) at the time that an incident of violence occurs, including but not limited to sexual assault, domestic violence, dating violence or stalking, may be hesitant to report such incidents due to fear about potential consequences for their own conduct. Bryant encourages students to report instances of Sex Discrimination. A bystander acting in good faith, or a reporting individual acting in good faith, who discloses an incident of violence to the University's officials or law enforcement will not be subject to the University's Student Handbook for violations of alcohol- and/or drug-use policies occurring at or near the same time of the commission of the incident.

XI. Academic Freedom

Bryant is committed to the principles of free inquiry and expression. Vigorous discussion and debate are fundamental to this commitment, and this Policy is not intended to restrict teaching methods. Offensiveness of inquiry or expression, standing alone, is not sufficient to constitute Prohibited Conduct. Rather, the conduct must be subjectively and objectively offensive, as well as so severe or pervasive that the conduct results in limitation or denial of a person's ability to participate or attempt to participate in Bryant's education program or activity. Sex Discrimination compromises Bryant's integrity and tradition of intellectual

freedom and will not be tolerated.

XII. Applicable State Laws

Conduct that violates this Policy may also violate the local laws of the State of Rhode Island or other jurisdiction where the incident occurred and could subject an accused to criminal prosecution. As noted above, an individual can choose to make a report to external law enforcement at any time, and doing so does not preclude the individual from making a report to the University. Both processes can be pursued if an individual chooses to do so. Prompt external reporting is important to a criminal investigation and prosecution.

The preponderance of the evidence standard used by Bryant (“more likely than not”) is not the same standard for criminal culpability. A determination of responsibility under a Bryant policy does not equate to a violation of criminal law.

XIII. Sexual Assault Prevention, Education, and Training

Bryant provides programs designed to promote the awareness of Prohibited Conduct, including primary prevention and awareness programs for all incoming students and new employees which address the University’s prohibition against Prohibited Conduct, the definitions of such conduct, the definition of consent in reference to sexual activity, safe and positive options for bystander intervention, and information on risk reduction to recognize warning signs of abusive behavior and how to avoid potential attacks.

This information is provided to students during mandatory Best Bulldog Modules, New Student and Transfer Orientation, and Welcome Week trainings. This information is also provided to students during the following optional trainings: “Bystander Intervention in 3D,” “Healthy Relationship and Hookup Culture,” “Got Consent?,” Domestic Violence Awareness Week programs, and Sexual Assault Awareness Week programs.

All Campus Security Authorities receive annual training on reportable crimes under the Clery Act including all forms of sex-based discrimination and harassment. All employees, including the Title IX Coordinator and all persons involved in the University’s Title IX grievance procedures (including its investigators, facilitators of informal resolutions, decision-makers, and appeals officers) will receive annual Title IX training, particularly the requirements of the Title IX Procedures. Upon hiring or a change of position that alters their duties under Title IX, all employees will promptly receive training related to their duties under Title IX.

Title IX Procedures

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II. Purpose

A. As a recipient of federal financial assistance, Bryant University (“Bryant” or the “University”) is subject to Title IX of the Education Amendments of 1972 (“Title IX”). See 20 U.S.C. § 1681(a). Consistent with Title IX and Bryant’s community standards, the University prohibits discrimination on the basis of sex within its education program or activity.

B. To effectuate its Title IX compliance, Bryant has published its Policy Prohibiting Title IX Sex Discrimination (“Title IX Policy”) and these related Title IX Procedures. The University’s Title IX Procedures apply concurrently with the Title IX Policy, which states the University’s prohibitions against Sex Discrimination, prescribes mandatory employee reporting obligations, and details available confidential and supportive resources.

C. The United States Department of Education’s Office for Civil Rights has promulgated Title IX regulations titled “Nondiscrimination on the Basis of Sex in Education Programs or Activities Receiving Federal Financial Assistance” (“Title IX Regulations”). See 34 Code of Federal Regulations (“CFR”), Part 106. Bryant’s Title IX Policy and these Title IX Procedures implement the University’s compliance with the Title IX Regulations (as amended effective August 1, 2024).

D. Bryant’s Title IX education program or activity encompasses all of the University’s operations. See Title IX Policy for a description of the University’s education program or activity.

E. The Title IX Regulations prescribe Bryant’s responsive actions and measures upon its knowledge of Sex Discrimination in its education program or activity. See 34 CFR § 106.44. These Title IX Procedures delineate Bryant’s provision of appropriate Supportive Measures and ability to take interim measures to ensure equal access to its education program or activity.

F. The Title IX Regulations also require that Bryant must publish and implement written Grievance Procedures for the resolution of Complaints alleging Title IX discrimination. These Title IX Procedures delineate Bryant’s prompt and equitable Grievance Procedures, which are consistent with 34 CFR § 106.45 (Grievance Procedures for the Prompt and Equitable Resolution of Complaints of Sex Discrimination) and 34 CFR § 106.46 (Grievance Procedures of for the Prompt and Equitable Resolution of Complaints of Sex-Based Harassment Involving Student Complainants or Student Respondents). Bryant administers two types of Grievance Procedures as prescribed herein, which are dependent upon the alleged prohibited conduct and the parties’ status.

III. Application

A. Bryant applies these Title IX Procedures to effectuate the prompt and equitable resolution of Complaints made by students, employees, or other

individuals who are participating or attempting to participate in Bryant's education program or activity, or by the Title IX Coordinator, alleging Sex Discrimination.

B. While the University has collective bargaining agreements and/or employment contracts with some of its employees, Bryant's obligations under Title IX are prescribed by federal law, and the University must implement Grievance Procedures that comply with the Title IX Regulations.

C. Bryant's Title IX Coordinator shall be responsible for making a prompt and equitable determination of whether reported and alleged conduct may constitute Sex Discrimination prohibited by Title IX. If any matter is dismissed under these procedures as outside of Title IX's jurisdictional or definitional scope, then, in Bryant's discretion, the University has the authority to address and adjudicate such alleged conduct under any other applicable code, policy, procedure, or rule (collectively "University Rules"). Other University Rules include the policies and procedures prescribed within Bryant's Student Handbook (including the Code of Student Conduct) or Employee Handbook or under the terms of a collective bargaining agreement. Incidents that are not covered by Title IX will be referred to other University departments as appropriate (e.g., Student Affairs, Human Resources, etc.).

D. Bryant may apply and enforce process under any of its other University Rules concurrently with these Title IX Procedures, when a matter raises alleged conduct both covered by and outside of Title IX. Also, to the extent that any alleged conduct falling outside of Title IX is discovered during the course of an investigation of alleged Title IX discrimination, Bryant has the authority to investigate and adjudicate such non-Title IX allegations under other University Rules.

E. In the event of any conflict between the Title IX Regulations and Bryant's policies and procedures, the Title IX Regulations shall control to resolve any such conflict in meaning or application.

F. Any individuals who wish to file a complaint against Bryant regarding its Title IX compliance may contact the Department of Education's Office for Civil Rights using the contact information provided in the University's Policy Prohibiting Title IX Sex Discrimination or available at <https://www2.ed.gov/about/offices/list/ocr/complaintprocess.html>.

IV. The Title IX Coordinator

A. Bryant's Title IX Coordinator is responsible for coordinating and effectuating the University's Title IX compliance. To assist with and ensure Bryant's Title IX compliance, the Title IX Coordinator may delegate specific duties to one or more designees, as deemed appropriate.

B. The name and contact information of Bryant's Title IX Coordinator is:

Michelle Harris, J.D.

Title IX Coordinator

1150 Douglas Pike

Smithfield, RI 02917 Mharris11@bryant.edu

401-232-6105

C. All references to the Title IX Coordinator herein includes a designee.

V. Definitions

A. Sex Discrimination: Sex Discrimination is prohibited under Title IX and Bryant's Title IX Policy. Sex Discrimination is discrimination on the basis of an individual's sex, including discrimination based upon sex stereotypes, sex characteristics, pregnancy or related conditions, sexual orientation, and gender identity. All references to Sex Discrimination within Bryant's Title IX policies and procedures include prohibited Sex-Based Harassment, as defined below.

B. Sex-Based Harassment: Sex-Based Harassment is a form of prohibited Sex Discrimination, which entails sexual harassment and other harassment on the basis of sex, including harassment on the basis of sex stereotypes, sex characteristics, pregnancy or related conditions, sexual orientation, and gender identity. Sex-Based Harassment may entail conduct under one or more of the following categories: (1) Quid Pro Quo Harassment; (2) Hostile Environment Harassment; and/or (3) Sex-Based Crimes (Sexual Assault, Dating Violence, Domestic Violence, or Stalking).

1. Quid Pro Quo Harassment occurs when a Bryant employee, agent, or other person authorized by the University to provide an aid, benefit, or service under Bryant's education or activity explicitly or impliedly conditions the provision of an aid, benefit, or service on an individual's participation in unwelcome sexual conduct.

2. Hostile Environment Harassment occurs when unwelcome sex-based conduct that, based on the totality of the circumstances, is subjectively and objectively offensive and so severe or pervasive that it limits or denies a person's ability to participate in or benefit from Bryant's education program or activity (i.e., creates a hostile environment). Whether a hostile environment has been created is a fact-specific inquiry that includes the University's consideration of the following factors:

f. The degree to which the conduct affected an individual's ability to access Bryant's education program or activity;

g. The type, frequency, and duration of the conduct;

h. The parties' ages, roles within Bryant's education program or activity, previous interactions, and other factors about each party that may be

relevant to evaluating the effects of the conduct;

- i. The location of the conduct and the context in which the conduct occurred; and
- j. Other Sex-Based Harassment in Bryant's education program or activity.

3. Sex-Based Crime means an offense classified as a forcible or non-consensual sex offense under the uniform crime reporting system of the Federal Bureau of Investigation. A Sex-Based Crime includes conduct constituting any one of the following four offenses: Sexual Assault (20 U.S.C. § 1092(f)(6)(A)(v)), Dating Violence (20 U.S.C. § 12291(a)(10)), Domestic Violence (34 U.S.C. § 12291(a)(8)), and Stalking (34 U.S.C. § 12291(a)(30)).

a. Sexual Assault is a sexual act directed against another person, by force, threat of force, coercion, or without consent, including instances where the person is incapable of giving consent. Sexual Assault includes the offenses of Rape, Sodomy, Sexual Assault with an Object, Fondling, Incest, and Statutory Rape.

i. Rape: The carnal knowledge of a person, without consent of the victim, including instances where the victim is incapable of giving consent because of their age or because of their temporary or permanent mental or physical incapacity.

ii. Sodomy: Oral or anal sexual intercourse with another person, without the consent of the victim, including instances where the victim is incapable of giving consent because of their age or because of their temporary or permanent mental or physical incapacity.

iii. Sexual Assault with an Object: To use an object or instrument to unlawfully penetrate, however slightly, the genital or anal opening of the body of another person, without the consent of the victim, including instances where the victim is incapable of giving consent because of their age or because of their temporary or permanent mental or physical incapacity.

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

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

vi. Statutory Rape: Non-forcible sexual intercourse with a person who is under the age of statutory age of consent (age 16 in Rhode Island).

e. Dating Violence: Dating Violence is violence committed by a person who is or has been in a social relationship of a romantic or intimate nature with the victim. Dating violence includes, but is not limited to, sexual or physical abuse or the threat of such abuse. The existence of the relationship shall be determined based on a consideration of the following factors: the length of the relationship, the type of relationship, and the frequency of interaction between the persons involved in the relationship.

f. Domestic Violence: Domestic Violence includes felony or misdemeanor crimes committed by a current or former spouse or intimate partner of the victim or a person similarly situated to a spouse of the victim, by a person who is cohabitating, or has cohabitated, with the victim as a spouse or intimate partner, by a person who shares a child in common with the victim, or by a person who commits acts against a youth or adult victim who is protected under family or domestic violence laws of the jurisdiction. All forms of domestic violence prohibited by Rhode Island law are also included.

g. Stalking: Stalking occurs when a person engages in a course of conduct directed at a specific person under circumstances that would cause a reasonable person to fear for their own safety or the safety of others or suffer substantial emotional distress. Course of conduct means two or more instances including but not limited to unwelcome acts in which an individual directly, indirectly, or through third parties, by any action, method, device, or means, follows, monitors, observes, surveils, threatens or communicates to or about a person, or interferes with a person's property. Substantial emotional distress means significant mental suffering or anguish. Stalking includes the concept of cyber-stalking, a particular form of stalking in which electronic media such as the internet, social networks, blogs, cell phones, texts, or similar devices or forms of contact are used.

C. Complainant: The Complainant is an individual who is (a) a student or employee who is alleged to have been subjected to conduct that could constitute Sex Discrimination or (b) a person other than a student or employee who is alleged to have been subjected to conduct that could constitute Sex Discrimination and was participating or attempting to participate in Bryant's education program or activity at the time of the alleged Sex Discrimination. Under Bryant's Title IX Procedures, a reference to a "party" includes the Complainant.

D. Complaint: A Complaint means an oral or written request to Bryant that objectively can be understood as a request for the University to investigate and

make a determination about alleged Sex Discrimination prohibited by Title IX and Bryant's Title IX Policy.

E. Consent: The definitions of Consent and the related definitions of Incapacitation, Coercion, Force, and Intimidation, as stated in Bryant's Title IX Policy, are incorporated herein into these Title IX Procedures.

F. Disciplinary Sanctions: Disciplinary Sanctions mean consequences imposed on a Respondent following the University's determination under Title IX that the Respondent violated the University's prohibitions against Sex Discrimination or Sex-Based Harassment.

G. Grievance Procedure: A Grievance Procedure refers to the applicable process that Bryant will utilize to review, investigate, and determine a Complaint alleging "Sex Discrimination." As stated herein, Bryant administers to two types of Grievance Procedures – one to address Complaints of Sex Discrimination ("Type 1 Grievance Procedure") and the other to address specifically Complaints of Sex-Based Harassment Involving Student Complainants or Student Respondents ("Type 2 Grievance Procedure"). Bryant's Grievance Procedures are designed to comply with the Title IX Regulation's requirements specified at 34 CFR §§ 106.45 and 106.46.

H. Informal Resolution Process: Informal Resolution Process refers to a voluntary process in which the parties seek to resolve a matter of alleged Sex Discrimination, subject to the requirements and University approvals prescribed herein.

I. Relevant: Relevant means related to the allegations of Sex Discrimination under investigation as part of Bryant's Grievance Procedures. Questions are relevant when they seek evidence that may aid in showing whether the alleged Sex Discrimination occurred, and evidence is relevant when it may aid a decisionmaker in the determination of whether the alleged Sex Discrimination occurred. During Grievance Procedures, certain Relevant evidence may be deemed as otherwise impermissible as specified herein.

J. Remedies: Remedies are provided to a Complainant or any other person whom Bryant identifies as having had their equal access to the University's education program or activity limited or denied by Sex Discrimination. Remedial measures are provided to restore or preserve the person's access to Bryant's education program or activity after the University has determined that Sex Discrimination has occurred.

K. Respondent: The Respondent is an individual who is alleged to have violated Bryant's prohibitions against Sex Discrimination. Under Bryant's Title IX Procedures, a reference to a "party" includes the Respondent.

L. Supportive Measures: Supportive Measures are non-disciplinary, non-punitive individualized services and accommodations offered, as appropriate and reasonably available, and without fee or charge, that are designed to

restore or preserve equal access to the University's education program or activity without unreasonably burdening the Complainant or the Respondent, including measures designed to protect the safety of persons impacted by a report or the University's community, or to deter Sex Discrimination, as well as provide support during the Grievance Procedures or during an Informal Resolution Process.

Examples of Supportive Measures include, but are not limited to: counseling; extensions of deadlines and other course-related adjustment; campus escort services; increased security and monitoring of certain areas of campus; restrictions on contact applied to one or more parties; leaves of absence; changes in class, work, housing, or extracurricular or other activity, regardless of whether or not there is a comparable alternative; counseling, and training and education programs. Supportive Measures may vary based upon what Bryant deems to be reasonably available.

As coordinated by Bryant's Title IX Coordinator, Supportive Measures will be offered and provided equitably to the Complainant and Respondent, as circumstances reasonably permit. Bryant will maintain as confidential any Supportive Measures provided to the Complainant and Respondent to the extent that maintaining such confidentiality would not impair the University's ability to provide the Supportive Measures

VI. The University's Response to Reports of Sex Discrimination

A. Upon Bryant's knowledge of conduct that reasonably may constitute Sex Discrimination in its education program or activity, Bryant must respond in a prompt and equitable manner designed to end the discrimination, prevent its recurrence, and remedy its effects. The University shall be deemed to possess knowledge of alleged Sex Discrimination when it is reported by an individual directly to the Title IX Coordinator or to a University employee who is deemed to be a mandatory reporter (as defined by and subject to the requirements stated in the University's Title IX Policy).

B. Upon the University's knowledge of alleged Sex Discrimination, the Title IX Coordinator shall notify the Complainant, or if the Complainant is unknown, the individual who reported the conduct of the applicable Grievance Procedure (depending on whether the reported Sex Discrimination involves alleged Sex-Based Harassment with a student Complainant or a student Respondent) and the Informal Resolution Process. Prior to an oral or written complaint to initiate a Grievance Procedure, the Title IX Coordinator must offer and coordinate Supportive Measures for the Complainant.

C. If a Complaint is made or an offer of an Informal Resolution Process is made, the Title IX Coordinator must offer and coordinate Supportive Measures for the Respondent.

D. Bryant shall treat the Complainant and Respondent equitably throughout its responsive actions, including in its offering and coordination of Supportive Measures and throughout the administration of its below-described (i) Grievance Procedure for the resolution of Complaints of Sex Discrimination (“Type 1 Grievance Procedure”) and (ii) Grievance Procedure for the resolution of Complaints of Sex-Based Harassment (involving a student Complainant or a student Respondent) (“Type 2 Grievance Procedure”), as well as during an Informal Resolution Process.

E. Bryant must not disclose personally identifiable information obtained in its responsive actions, except in the following circumstances: (a) when the University had obtained prior written consent from a person with the legal right to consent to the disclosure; (b) when the information is disclosed to a parent of a minor, guardian of a minor, or an authorized legal representative with the legal right to receive disclosures on behalf of the person whose personally identifiable information is at issue; (c) to address conduct that reasonably may constitute Sex Discrimination under Title IX in Bryant’s education program or activity; (d) as required under Federal Law, Federal regulations, or the terms of a Federal award, including a grant award or other funding agreement; or (e) to the extent such disclosures are not otherwise in conflict with Title IX or the Title IX Regulations, when required by State or local law, or when permitted under the Family Educational Rights and Privacy Act (FERPA), 20 U.S.C. § 1232g or its implementing regulations, 34 CFR Part 99.

VII. Implementation and Modification of Supportive Measures

A. Supportive Measures must not unreasonably burden either party and must be designed to protect the safety of the parties or Bryant’s community. Supportive Measures must be designed to support Bryant’s prompt and equitable administration of its Grievance Procedures or an Informal Resolution Process.

B. Bryant may, as appropriate, modify or terminate Supportive Measures at the conclusion of its Grievance Procedures or at the conclusion of an Informal Resolution Process. Bryant also maintains the right and discretion to continue Supportive Measures beyond the completion of a Grievance Procedure or an Informal Resolution Process.

C. A Complainant or a Respondent has the right to seek from an impartial Bryant employee the modification or reversal of Bryant’s decision to provide, deny, modify, or terminate Supportive Measures applicable to the party. The impartial decision maker has the authority to modify or reverse the decision, applying the definition and purpose of Supportive Measures and reviewing objectively all reasonable facts and circumstances. In the case of a student party seeking a modification or reversal, the request shall be presented in writing to the Vice President for Student Affairs & Dean of Students or a

designee. In the case of an employee party, the request shall be presented to the Vice President for Human Resources or a designee. The impartial decisionmaker shall render a written determination within three (3) business days. The Title IX Coordinator shall be responsible to ensure the prompt implementation of any such modification or reversal action. A party shall likewise have the same rights and process to seek additional modification or termination of a Supportive Measure applicable to them if circumstances change materially.

D. Bryant must not disclose information about Supportive Measures to persons other than those to whom they apply, including informing one party of Supportive Measures to the other party, unless necessary to provide the Supportive Measures or restore or preserve a party's access to the University's education program or activity, or when one of the above-described five exceptions to the disclosure of personally identifiable information would similarly apply to the disclosure of the Supportive Measures.

E. If a Complainant or Respondent is an individual with a disability, the Title IX Coordinator may consult, as appropriate, with Marie Saddlemire, Ph.D., Director, Accessibility Services in Bryant's implementation of Supportive Measures.

VIII. Emergency Removal of a Respondent or Placement of an Employee Respondent on Administrative Leave

A. Bryant reserves the right to remove a Respondent on an emergency basis, provided that it undertakes an individualized safety and risk analysis, determines that an immediate and serious threat to the health or safety of a Complainant or any students, employees, or other persons arising from the allegations of Sex Discrimination justifies removal, and provides Respondent with written notice stating the reasons for its actions and an opportunity to challenge the removal. In the case of the emergency removal of a student, the Respondent shall have the right to challenge the removal within five (5) business days after the action, by submitting a written explanation to the Vice President of Student Affairs & Dean of Students (or the Vice President's designee). In the case of an emergency removal of an employee, the Respondent shall have the right to challenge the removal within five (5) business days after the action, by submitting a written explanation to the Vice President of Human Resources (or the Vice President's designee). Within five business days after Bryant's receipt of the challenge, the Vice President or the designee shall issue a responsive written determination. Bryant must consider all emergency removal actions in a manner consistent with a Respondent's rights under Section 504 of the Rehabilitation Act of 1973, 29 U.S.C. § 794, or the American with Disabilities Act of 1990, 42 U.S.C. § 12101 et seq.

B. During a Grievance Procedure, Bryant may place an employee Respondent on administrative leave status. The administrative leave action shall be undertaken consistently with applicable University employment policies and/or employment

agreements. The University's administrative leave action must consider the rights of the employee under Section 504 of the Rehabilitation Act of 1973, 29 U.S.C. § 794, or the Americans with Disabilities Act of 1990, 42 U.S.C. § 12101 et seq.

IX. The Option for an Informal Resolution Process

A. Bryant offers the parties the option to participate in an Informal Resolution Process, as an alternative to an investigation and determination under a Grievance Procedure. The Informal Resolution Process uses mediation or other forms of dispute resolution with the goal that the parties arrive at a voluntary and mutually agreed-upon outcome. The Informal Resolution Process may be commenced at any time before a Grievance Procedure has reached a determination of whether Sex Discrimination occurred as alleged.

B. An Informal Resolution Process is not permitted to resolve any allegations if such process would conflict with any applicable Federal, State or local law.

C. The following requirements apply to the Informal Resolution Process:

1. The parties must voluntarily consent in writing to the Informal Resolution Process.
2. Bryant will not require waiver of the right to an investigation and determination of a Complaint as a condition or enrollment or continuing enrollment, or employment or continuing employment, or exercise of any right.
3. The Title IX Coordinator must agree that the matter is one suitable and appropriate for an Informal Resolution Process.
4. The Title IX Coordination shall designate a trained person to facilitate the Informal Resolution Process. This person shall not have any conflict of interest or bias for or against Complainants and Respondents generally or the Complainant and Respondent who are the parties.
5. At any point prior to reaching an agreement through the Informal Resolution Process, the parties have the right to withdraw from the process and elect to initiate or resume a Grievance Procedure. Withdrawal from the Informal Resolution Process must be in writing.

D. Prior to the commencement of an Informal Resolution Process, the Title IX Coordinator will provide the parties with a written notice disclosing (1) the allegations, (2) the requirements of the Informal Resolution Process, (3) the parties' right to withdraw from the Informal Resolution Process and initiate or resume a Grievance Procedure, (4) the fact that an agreement at the end of the Informal Resolution process precludes the initiation or resumption of Grievance Procedures relating to the same allegations, (5) the potential terms that may be requested or offered in the Informal Resolution agreement that

will be binding only on the parties, and (6) the information that Bryant will maintain or could disclose for use in Grievance Procedures that are initiated or resumed if the Informal Resolution Process is terminated without a binding agreement.

E. The Informal Resolution Process will be completed within thirty (30) business days after its initiation, unless extended by voluntary written agreement of the parties and approved by the Title IX Coordinator.

F. An Informal Resolution Process agreement is reached when both parties independently and voluntarily come to a written, signed agreement on the terms, which have been accepted and approved by the Title IX Coordinator. The agreement is final, and the Complaint is considered resolved and closed. A matter may be reopened only upon a party's showing and Bryant's agreement that the other party engaged in a material misrepresentation or fraudulent conduct that directly impacted the Informal Resolution Process or agreed-upon terms.

G. There is no right to appeal a matter resolved by an Informal Resolution Process.

H. While an Informal Resolution Process is ongoing or following its successful completion, the Title IX Coordinator shall continue to have the authority and obligation to take other appropriate prompt and effective steps to ensure that Sex Discrimination does not continue or recur in Bryant's education program or Activity.

X. The Complaint to Initiate a Grievance Procedure (Including the Title IX Coordinator's Discretion to Initiate a Complaint)

A. A Complaint is required for the University to commence a Grievance Procedure to investigate and determine reported allegations of Sex Discrimination. A Complaint may be conveyed as either a written or oral request to Bryant, which objectively can be understood as a request for the University to investigate and determine the alleged Sex Discrimination.

B. The following persons have the right to make a Complaint of Sex Discrimination requesting that Bryant investigate and make a determination regarding the alleged discrimination:

i. A Complainant;

ii. A parent or guardian of a minor or an authorized legal representative with the legal right to act on a Complainant's behalf;

iii. The Title IX Coordinator, acting in accordance with and under the circumstances described below.

iv. Additionally, with respect to Complaints of Sex-Based Harassment,

any student or employee, or any person other than a student or employee who was participating or attempting to participate in Bryant's education program or activity at the time of the alleged discrimination.

C. The Title IX Coordinator may initiate a Complaint under the following circumstances: In the absence of a Complaint or the withdrawal of a Complaint, or in the absence or termination of an Informal Resolution Process, the Title IX Coordinator may determine that the University should proceed with a Complaint in the best interests of its community and/or to ensure equal access to the University's education program and activity. The Title IX Coordinator shall make a fact-specific assessment and determination that considers the Relevant factors, including but not necessarily limited to:

- i. The Complainant's request not to proceed with the initiation of a Complaint;
- ii. The Complainant's reasonable safety concerns regarding the initiation of a Complaint;
- iii. The risk that additional facts of Sex Discrimination would occur if a Complaint is not initiated;
- iv. The severity of the alleged Sex Discrimination, including whether the discrimination, if established, would require the removal of a Respondent from campus or imposition of another disciplinary sanction to end the discrimination or prevent its recurrence;
- v. The age and relationship of the parties, including whether the Respondent is a Bryant employee;
- vi. The scope of the alleged Sex Discrimination, including information suggesting a pattern, ongoing Sex Discrimination, or Sex Discrimination alleged to have impacted multiple individuals;
- vii. The availability of evidence to assist a decisionmaker under a Grievance Procedure to determine whether Sex Discrimination occurred;
- viii. Whether Bryant could end the discrimination and prevent its recurrence without instituting a Grievance Procedure.

If after considering these and any other Relevant factors, the Title IX Coordinator determines that the conduct as alleged presents an imminent and serious threat to the health or safety of the Complainant, other person, or University community, or that the conduct as alleged prevents Bryant from ensuring equal access on the basis of sex to its education program or activity, the Title IX Coordinator may initiate a Complaint. Before initiating a Complaint, the Title IX Coordinator must notify the Complainant and appropriately address reasonable concerns about the Complainant's safety or the safety of others, including by

providing Supportive Measures as deemed reasonable and appropriate.

Regardless of whether the Title IX Coordinator initiates a Complaint, the Title IX Coordinator shall take other appropriate prompt and effective steps, in addition to steps necessary to effectuate the Remedies provided to an individual Complainant, if any, to ensure that the Sex Discrimination does not continue or recur within Bryant's education program or activity.

The Title IX Coordinator is not required to undertake the above-stated actions if the Title IX Coordinator reasonably determines that the conduct as alleged could not constitute Sex Discrimination under Title IX or the University's Title IX Policy. Upon such a determination, the Title IX Coordinator may refer the matter or concerns to the appropriate officers or offices within the University for any necessary responsive actions under University Rules.

X. The University's Two Types of Grievance Procedures – the "Type 1 Grievance Procedure" and the "Type 2 Grievance Procedure"

A. Bryant administers two types of Grievance Procedures to investigate and determine Complaints under Title IX. The applicable Grievance Procedure depends upon (i) whether the Complaint alleges Sex Discrimination ("Type 1 Grievance Procedure") or (ii) whether the Complaint alleges a specific form of Sex Discrimination known as Sex-Based Harassment (as defined above), where the Complaint's allegations involve a student Complainant or a student Respondent ("Type 2 Grievance Procedure").

B. When a party is both a student and an employee of Bryant, the Title IX Coordinator will make a fact-specific determination regarding which Grievance Procedure ("Type 1" or "Type 2") should apply. In making this determination, the Title IX Coordinator must, at a minimum, determine whether the alleged Sex-Based Harassment occurred while the party was performing employment-related work.

C. While many of the requirements of the two processes are similar, there are distinct and additional requirements applicable to the Type 2 Grievance Procedure where a student is a Complainant alleging Sex-Based Harassment and/or where a student is a Respondent accused of Sex-Based Harassment. A Type 2 Grievance Procedure requires that the University must convene a live hearing to make its determination.

D. Within five (5) business days after Bryant's receipt of the Complaint, the Title IX Coordinator shall conduct and complete an initial review of the Complaint to determine whether allegations, if proven, relate to conduct that must be investigated and determined under either the Type 1 Grievance Procedure or the Type 2 Grievance Procedure. If a Complaint shall proceed to an investigation and is not dismissed as a result of the Title IX Coordinator's initial review (for reasons specified below), the Title IX Coordinator shall

specify the applicable Grievance Procedure in the written notice of allegations.

XI. Dismissal of a Complaint

A. Bryant may dismiss a Complaint alleging Sex Discrimination if:

- Bryant is unable to identify the Respondent after taking reasonable steps to do so;
- The Respondent is not participating in Bryant's education program or activity or is not employed by Bryant;
- The Complainant voluntarily withdraws in writing any or all of the allegations in the Complaint, the Title IX Coordinator declines to initiate a Complaint, and Bryant determines that, without the Complainant's withdrawn allegations, the conduct that remains alleged in the Complaint, if any, would not constitute Sex Discrimination under Title IX even if proven; or
- Bryant determines the conduct in the Complaint, even if proven, would not constitute Sex Discrimination under Title IX. This determination should be made as part of the Title IX Coordinator's initial review within five (5) business days after receipt of the Complaint. Before dismissing the Complaint, Bryant will make reasonable efforts to clarify the allegations with the Complainant.

B. Upon a determination to dismiss the Complaint, Bryant will promptly notify the Complainant in writing of the basis for the dismissal. If the dismissal occurs after the Respondent has been notified of the allegations, then Bryant will concurrently provide written notification to the Respondent of the basis for the dismissal.

C. Bryant's notification of dismissal shall state that the dismissal may be appealed on any of the following three bases:

- Procedural irregularity that would change the dismissal decision;
- New evidence that would change the dismissal decision and that was not reasonably available when the dismissal was made; or
- The Title IX Coordinator, investigator, or decisionmaker had a conflict of interest or bias for or against Complainants or Respondents generally or the individual Complainant or Respondent that would change the outcome.

D. If the dismissal is appealed, Bryant will:

- Notify the parties of any appeal and allow a party to file a written response to the other party's appeal within five (5) business days;

- Implement the appeal procedures equally for the parties;
- Ensure that the decisionmaker for the appeal has been trained to review and determine the appeal; and
- Notify the parties of the result of the appeal and the rationale for the result.

E. The Title IX Coordinator shall direct an appeal to the attention of the Vice President of Student Affairs & Dean of Students in student Respondent Cases, the Provost in faculty Respondent cases, and the Vice President for Human Resources in non-faculty employee Respondent cases. Each of these appeal officers may appoint a designee to determine the appeal of a dismissal determination.

F. When a Complaint is dismissed, Bryant will ensure the following actions (including during the pendency of an appeal) and thereafter as appropriate:

- Offer Supportive Measures to the parties;
- Take other prompt and effective steps, as appropriate, through the Title IX Coordinator to ensure that Sex Discrimination does not continue or recur within its education program or activity.

G. The dismissal of a Complaint does not preclude Bryant from proceeding with a process and actions under any of its University Rules, including but not limited to the Student Handbook's Code of Student Conduct or the Employee Handbook, or under an applicable collective bargaining agreement.

XII. Consolidation of Complaints

A. Bryant has the discretion to consolidate Complaints against more than one Respondent, or by more than one Complainant against one or more Respondents, or by one party against another party, when the allegations arise out of the same facts or circumstances. Bryant shall evaluate whether to consolidate Complaints in accordance with its FERPA obligations.

B. If one of the Complaints to be consolidated is a Complaint alleging Sex-Based Harassment involving a Student Complainant or a Student Respondent, Bryant shall apply and comply with its Type 2 Grievance Procedure.

XIII. Basic Requirements of Both Types of Grievance Procedures

In its equitable administration of its Type 1 and Type 2 Grievance Procedures, Bryant will adhere to the following requirements at all times:

- A. Bryant will treat Complainants and Respondents equitably.
- B. Bryant requires that the Title IX Coordinator, an investigator (whether an

internal investigator or retained external investigator), or a decisionmaker (including an appellate officer) must not have a conflict of interest or bias for or against Complainants or Respondents generally or an individual Complainant or Respondent.

C. Bryant presumes that the Respondent is not responsible for the alleged Sex Discrimination until a determination is made at the end of the applicable Grievance Procedure.

D. As specified herein, Bryant has established timelines for major stages of the applicable Grievance Procedure (e.g., the decision whether to dismiss or investigate a Complaint, the investigation, the determination, and the appeal).

E. Bryant is committed to completing its applicable Grievance Procedure as promptly as possible within the prescribed time periods, consistent with the need to conduct sensitive and informed fact-gathering to ensure an equitable and unbiased resolution. The University may extend a time period for good cause. The University or the parties (upon request) may require or allow an extension of its deadlines to ensure the integrity and thoroughness of the investigation and determination; to comply with a request by law enforcement; due to the unavailability of the parties or witnesses; or other legitimate reasons, such as intervening breaks in the University calendar, University finals periods, the complexity of the investigation, the volume of information, number of witnesses, length of the written record, and/or the severity and extent of the alleged conduct. While Bryant will be fair and balanced in a party's request for an extension, the University cannot unduly delay the prompt resolution of a Grievance Procedure. In all matters relating to the consideration of any extension or alteration of a time period or prescribed deadline, the Title IX Coordinator has the authority to determine whether an extension or alteration is required or warranted by the circumstances.

F. Bryant will take reasonable steps to protect the privacy of the parties and witnesses during the Grievance Procedure. These steps will not restrict the ability of the parties to obtain and present evidence, including by speaking to witnesses; consult with their family members, confidential resources, or advisors; or otherwise prepare for or participate in a Grievance Procedure. Bryant emphasizes that the parties cannot engage in retaliation, including against witnesses.

G. Bryant will objectively evaluate all evidence that is Relevant and not otherwise impermissible – including both inculpatory and exculpatory evidence. Credibility determinations will not be based on a person's status as a Complainant, Respondent, or witness.

The following types of evidence, and questions seeking that evidence, are impermissible (i.e., will not be accessed or considered, except by Bryant to determine whether one of the listed below exceptions applies; will not be disclosed, and will not be otherwise used), regardless of whether the evidence is

Relevant:

- Evidence that is protected under a privilege recognized by Federal or State law or evidence provided to a confidential employee, unless the person to whom the privilege or confidentiality is owed has voluntarily waived the privilege or confidentiality;
- A party's or witness's records that are made or maintained by a physician, psychologist, or other recognized professional or paraprofessional in connection with the provision of treatment of a party or witness, unless Bryant obtains that party's or witness's voluntary, written consent for use in the Grievance Procedure.
- Evidence that relates to a Complainant's sexual interests or prior sexual conduct, unless evidence about the Complainant's prior sexual conduct is offered to prove that someone other than the Respondent committed the alleged conduct or is evidence about specific incidents of the Complainant's prior sexual conduct with the Respondent that is offered to prove consent to the alleged Sex-Based Harassment. The fact of prior consensual sexual conduct between the Complainant and Respondent does not by itself demonstrate or imply that Complainant's consent to the alleged Sex-Based Harassment or preclude determination that Sex-Based Harassment occurred.

H. Under Bryant's Title IX Grievance Procedures, the applicable Standard of Evidence is the Preponderance of the Evidence Standard. Preponderance means that a proposition or fact is more probably true than not true.

XIV. The Type 1 Grievance Procedure (For the Prompt and Equitable Resolution of Complaints of Sex Discrimination).

As stated above, Bryant will apply and administer its Type 1 Grievance Procedure to investigate and determine all Complaints alleging Sex Discrimination prohibited under Title IX, except that this process shall not apply to Complaints alleging Sex-Based Harassment involving a student Complainant or a student Respondent (which shall be investigated and determined under the Type 2 Grievance Procedure). The Type 1 Grievance Procedure is designed to effectuate and comply with the requirements of the Title IX Regulations prescribed by 34 CFR § 106.45.

Bryant will make reasonable efforts to complete the major stages of the Type 1 Grievance Procedure within the below-stated time periods, subject to extensions by the University or at the request of a party for good cause, with written notice to the parties that explains the reasons for any extension or delay. These timeframes set targeted periods, as each matter of alleged Title IX Sex Discrimination requires case-specific factors and circumstances. Bryant shall seek to adhere to the following timeframes in the Type 1 Grievance Procedure:

- Completion of the Investigation: Sixty (60) business days after Bryant’s issuance of the notice of allegations;
- Determination of the Complaint by the decisionmaker: Fifteen (15) business days after the completion of the investigation;
- Determination of the appeal, if an appeal is timely filed: Fifteen (15) business days after the transmission of the appeal to the appeal officer.

References to “business days” exclude weekend days and legal holidays recognized by the University in its published academic year calendar. If a party has any uncertainty regarding the counting of days within a time period or a prescribed deadline date, the party should consult with the Title IX Coordinator.

A. Written Notice of Allegations

Upon Bryant’s initiation of a Type 1 Grievance Procedure, the University will provide written notice to the parties of the following information:

- Bryant’s determination that the Type 1 Grievance Procedure applies to the investigation and determination of the Complaint;
- Sufficient information available at the time to allow the parties to respond to the allegations, including the identity of the parties involved in the incident(s), the conduct alleged to constitute Sex Discrimination, and the date(s) and location(s) of the alleged incident(s);
- A statement that retaliation is prohibited;
- The parties are entitled to an equal opportunity to Bryant’s accurate description of the Relevant and not otherwise impermissible evidence. The parties may have an equal opportunity to access the Relevant and not otherwise impermissible evidence upon the request of any party.
- The Respondent shall be afforded the opportunity to submit a written response to the Complaint within five (5) business days after the issuance of the notice of allegations.

If, in the course of an investigation, Bryant decides to investigate additional allegations of Sex Discrimination by the Respondent toward the Complainant that are not included in the notice of allegations provided or that are included in a Complaint that is consolidated, the University will provide written notice of the additional allegations to the parties.

B. The Investigator and the Decisionmaker

The Title IX Coordinator will administer and oversee the Type 1 Grievance Procedure and shall not serve as either the investigator or the decisionmaker. All investigators and decisionmakers shall be trained on Bryant’s Title IX policies and procedures. The investigator and decisionmaker shall not be the same individual.

No person who may have helped to facilitate an attempt at an informal resolution process shall be the investigator or decisionmaker.

The Title IX Coordinator shall appoint an investigator depending on the Respondent's status at the University (e.g., an employee (such as a faculty or staff member) or a student). In a matter with an employee Respondent, the Title IX Coordinator shall appoint an investigator in consultation with Bryant's Office of Human Resources, particularly to evaluate the terms of any applicable collective bargaining agreement. In a matter with a student Respondent, The Title IX Coordinator shall appoint an investigator in consultation with Bryant's Office of Student Affairs. Bryant has the discretion to appoint an internal or external investigator to a matter. The investigator shall be responsible for fact-finding and evidence compilations, as well as making credibility assessments of the parties and witnesses.

In a matter with an employee Respondent, the decisionmaker to determine whether Sex Discrimination occurred shall be the Vice President of Human Resources or an appropriately trained designee.

In a matter with a student Respondent, the decisionmaker to determine whether Sex Discrimination occurred shall be the Vice President of Student Affairs & Dean of Students or an appropriately trained designee.

C. The Investigation

Bryant will provide for an adequate, reliable, and impartial investigation of the Complaint, which meets the following requirements:

- The burden is on Bryant – not the parties – to conduct the investigation that gathers sufficient evidence to determine whether Sex Discrimination occurred.
- Bryant will provide an equal opportunity for the parties to present fact witnesses and other inculpatory and exculpatory evidence that are Relevant and not otherwise impermissible.
- Bryant will review all evidence gathered through the investigation and determine what evidence is Relevant and whether any such evidence is otherwise impermissible.
- Bryant will provide each party with an accurate description of the evidence that is Relevant to the allegations of Sex Discrimination and not otherwise impermissible. Bryant will provide the parties with an equal opportunity to access the Relevant and not otherwise impermissible evidence upon the request of any party.
- Bryant will provide a reasonable opportunity to respond to the accurate description of the evidence.

- Throughout the investigation, Bryant will take reasonable steps to prevent and address unauthorized disclosure of information and evidence obtained solely through the Type 1 Grievance Procedure. Disclosures of such information and evidence for purposes of administrative proceedings or litigation related to the Complaint of Sex Discrimination are authorized.

D. Questioning of the Parties and Witnesses

To the extent that the investigation determines that credibility is both disputed and relevant to evaluate one or more of the allegations of Sex Discrimination, the decisionmaker will question the parties and witnesses, as deemed necessary, to adequately assess the credibility issues. If one party is questioned by the decisionmaker, the other party must similarly be questioned to ensure a full and balanced credibility determination.

E. Written Determination of Whether Sex Discrimination Occurred

Following the completion of the investigation and the questioning of the parties and witnesses by the decisionmaker (if necessary for credibility assessments), Bryant will:

- Use and apply the preponderance of evidence standard to determine whether Sex Discrimination occurred and the Respondent is responsible for the alleged conduct. The preponderance standard of proof requires the decisionmaker to evaluate Relevant and not otherwise impermissible evidence for its persuasiveness. If the decisionmaker is not persuaded that the preponderance of the evidence does not show that Sex Discrimination occurred, the decisionmaker shall determine that the Respondent is not responsible for the alleged conduct.
- Notify the parties in writing of the determination whether Sex Discrimination occurred including the rationale for such determination, and the procedures and permissible basis for the Complainant and the Respondent to appeal. The decisionmaker will issue the written decision within fifteen (15) business days after the completion of the investigation, unless good cause requires an extension of this timeframe.
- Not impose discipline on a Respondent for Sex Discrimination prohibited by Title IX unless there is a determination at the conclusion of the Type 1 Grievance Procedure that the Respondent engaged in prohibited Sex Discrimination.
- If there is a determination that Sex Discrimination occurred, the Title IX Coordinator will, as appropriate:
- Coordinate the provision and implementation of Remedies to a Complainant and other persons Bryant identifies as having had equal

access to the University's education program or activity limited or denied by Sex Discrimination;

- Coordinate the imposition of any Disciplinary Sanctions on a Respondent, including notification to the Complainant of any such sanctions; and
- Take other appropriate prompt and effective steps to ensure that Sex Discrimination (including retaliation) does not continue or recur within Bryant's education program or activity.
- Not discipline a party, witness or others participating in the Type 1 Grievance Procedure for making a false statement or for engaging in consensual sexual conduct based solely on the determination of whether Sex Discrimination occurred.

F. Range of Disciplinary Sanctions Upon Determination of Responsibility

Employee Respondent: Disciplinary Sanctions imposed upon a faculty or a staff member found responsible for Sex Discrimination in violation of Title IX, the range of appropriate disciplinary and/or corrective action shall be in accordance with personnel policies, and collective bargaining agreements. Actions may range from warnings or reprimands, changes in responsibilities, suspension with or without pay, to termination of employment, depending on the magnitude and specifics of the infraction.

Student Respondent: Disciplinary Sanctions imposed upon a student found responsible for Sex Discrimination in violation of Title IX shall be consistent with the range prescribed in the Student Handbook (including its Code of Student Conduct). Such sanctions range from a warning or reprimand, probation, residence hall restrictions or eviction, suspension, expulsion, a transcript notation describing the disciplinary action, revocation of admission or degree, and withholding of a degree. More than one of the Code's sanctions may be imposed for any single violation.

G. Appeal

Either party may appeal the determination, including any imposed Disciplinary Sanctions, only on one or more of the following grounds:

- Procedural irregularity that would change the outcome;
- New evidence that would change the outcome and that was not reasonably available when the determination or dismissal was made; and
- The Title IX Coordinator, investigator, or decisionmaker had a conflict of interest or bias for or against Complainants or Respondents generally or the individual Complainant or Respondent that would change the outcome.

Appeals must be submitted in writing to the Title IX Coordinator within five (5) business days after the issuance of the written determination, unless the appeal period is mutually extended for both parties for good cause. The party must specify the grounds and support for the appeal. An untimely appeal will be rejected and not considered by the University, absent compelling and/or exigent circumstances that directly impacted the timeliness of the filing and that the Title IX Coordinator deems appropriate to justify the acceptance of the appeal.

Upon a party's filing of an appeal, the Title IX Coordinator shall promptly notify the other party in writing and allow that party to submit a written response within five (5) business days of the notice.

Upon the receipt of a timely filed response or the expiration of the response period (whichever occurs first), the Title IX Coordinator shall direct the appeal to the University's President or an appropriately trained designee, who shall be the appeals officer determining the appeal. The appeal officer shall issue a written determination within fifteen (15) days thereafter, unless extended for good cause, stating the result and its rationale. The Title IX Coordinator will forward the written determination to the parties simultaneously. No further review is permitted.

The appeal officer may deny or grant the appeal in whole or in part. If an appeal is granted in whole or in part, the appeal officer may modify the determination or sanction, if any, and/or determine that further proceedings (such as additional investigation) are appropriate.

XV. The Type 2 Grievance Procedure (For the Prompt and Equitable Resolution of Complaints of Sex-Based Harassment Involving Student Complainants or Student Respondents).

Bryant will apply and administer its Type 2 Grievance Procedure to investigate and determine all Complaints alleging Sex-Based Harassment in which the Complainant or Respondent is a student or when both parties are students. The Type 2 Grievance Procedure is designed to effectuate and comply with the requirements of the Title IX Regulations prescribed by 34 CFR § 106.46. Bryant will conduct a live hearing to determine Complaints under the Type 2 Grievance Procedure.

Bryant will undertake reasonable efforts to complete the major stages of the Type 2 Grievance Procedure within the below-stated time periods, subject to extensions by the University or at the request of a party for good cause, with written notice to the parties explaining the reasons for any extension or delay. These timeframes set targeted periods, as each matter of alleged Sex-Based Harassment involving one or more student parties requires a case specific factors and circumstances. Bryant shall seek to adhere to the following timeframes in the Type 2 Grievance Procedure:

- Completion of the Investigation: Ninety (90) business days after Bryant’s issuance of the notice of allegations;
- The Live Hearing: As promptly as reasonably possible after the submission of the finalized investigation report, but the hearing shall not occur any earlier than at least ten (10) business days after the parties’ receipt of the finalized investigation report;
- Written Determination by the Hearing Officer: Fifteen (15) business days after the completion of the live hearing;
- Determination of the appeal, if an appeal is timely filed: Fifteen (15) business days after the transmission of the appeal to the appeal officer.

References to “business days” exclude weekend days and legal holidays recognized by the University in its published academic year calendar. If a party has any uncertainty regarding the counting of days within a time period or a prescribed deadline date, the party should consult with the Title IX Coordinator.

A. Written Notice of Allegations

Upon initiation of Bryant’s Type 2 Grievance Procedure, the University shall notify the parties in writing of the following information with sufficient time for the parties to prepare a response before any initial interview:

- Bryant’s determination that the Type 2 Grievance Procedure applies to the investigation and determination of the Complaint;
- Sufficient information available at the time to allow the parties to respond to the allegations, including the identities of the parties involved in the incident(s), the conduct alleged to constitute Sex-Based Harassment, and the date(s) and location(s) of the alleged incident(s);
- A statement that retaliation is prohibited;
- The Respondent is presumed not responsible for the alleged Sex-Based Harassment until a determination is made at the conclusion of the Type 2 Grievance Procedure. Prior to such a determination, the parties will have an opportunity to present Relevant and not otherwise impermissible evidence to a trained investigator during the investigation and the decisionmaker during the live hearing;
- The parties may have an adviser of their choice who may be, but is not required to be an attorney;
- The parties are entitled to an equal opportunity to access the Relevant and not otherwise impermissible evidence. During the investigation process, Bryant will provide the parties with an opportunity to provide written comments to the preliminary investigation report, which shall be reviewed and evaluated by the investigator before the completion of the

final investigation report.

- Bryant's Code of Student Conduct prohibits knowingly making false statements or knowingly submitting false information during the Grievance Procedure.

The Respondent shall be afforded the opportunity to submit a written response to the Complaint within five (5) business days after the issuance of the notice of allegations.

If, in the course of an investigation, Bryant decides to investigate additional allegations of Sex-Based Harassment by the Respondent toward the Complainant that are not included in the written notice of allegations or that are included in a consolidated Complaint, the University will provide written notice of the additional allegations to the parties.

B. The Investigator and the Hearing Officer

The Title IX Coordinator will administer the Type 2 Grievance Procedure and shall not serve as either the investigator or the decisionmaker. The decisionmaker shall be a single hearing officer who conducts and presides at the live hearing. The investigator and the hearing officer shall not be the same individual. Both the investigator and hearing officer shall be trained on Bryant's Title IX policies and procedures. No person who may have helped to facilitate an attempt at an informal resolution process shall be the investigator or the hearing officer. Bryant may appoint individuals external to University community as the investigator and/or the hearing officer.

C. The Investigation

Bryant will provide for an adequate, reliable, and impartial investigation of Complaints.

The burden is on Bryant – not the parties – to conduct the investigation that guides sufficient evidence to determine whether Sex-Based Harassment has occurred.

Bryant will provide a party whose participation is invited or expected, written notice of the date, time, location, participants, and purpose of all meetings or proceedings with sufficient time for the party to prepare to participate.

Bryant will provide the parties with the same opportunities to be accompanied to any meeting or proceeding by the advisor of their choice, who may be, but is not required to be an attorney. The advisor is expected to conduct himself or herself in accordance with the standards, decorum, and restrictions that are described below.

To the extent that Bryant determines that a person other than an advisor may be present on a party's behalf, upon request of a party, during any meeting or proceeding, Bryant shall afford the other party with a similar opportunity to have

a comparable person attend any meeting or proceeding on their behalf. Bryant is not obligated to grant such requests for attendance and will consider them on a case-by-case basis. Bryant shall make such determinations consistent with its FERPA obligations.

Bryant will provide an equal opportunity for the parties to present fact witnesses and other inculpatory and exculpatory evidence that are Relevant and not otherwise impermissible.

The investigator shall have the discretion whether to accept or reject, in whole or in part, any expert witness proposed by the parties. The parties shall have the equal right to propose an expert witness. The investigator shall make the determination of whether to consider or accept an expert witness based upon factors such as the following: the individual's experience and credentials, whether the proposed topic or issue necessitates an expert witness, the reliability of the expert witness' methodology, the factual basis for the proposed expert's testimony or opinion (including whether it is based upon Relevant and not otherwise impermissible evidence), the potential prejudice to the other party in allowing such an expert witness, and the scope and nature of the allegations under investigation.

Bryant will review all evidence gathered through the investigation to confirm that the evidence is Relevant and not otherwise impermissible.

D. Review of the Preliminary Report

The investigator will prepare a preliminary report based upon the Relevant and not impermissible evidence compiled during the investigation. The Title IX Coordinator shall be responsible for reviewing the preliminary report to ensure its compliance with the investigation requirements and the sufficiency of the investigation.

Upon the completion of the preliminary report, the parties and their advisors, if applicable, will be notified in writing by the Title IX Coordinator to inspect and review the preliminary report and the evidence obtained as part of the investigation. Each party shall be afforded ten (10) business days to submit written comments to the preliminary report

Prior to the completion of the investigation and issuance of a finalized report, the investigator will consider the parties' comments to determine whether any additional steps should occur in the investigation (such as further interviews or compilation of additional evidence) and the extent to which revisions to the report are appropriate before its completion. The investigator has the discretion to make such evaluations and determinations in a prompt and equitable manner.

E. The Live Hearing

In its determination of all Complaints subject to the Type 2 Grievance Procedure, in which a student is a party to a Complaint alleging Sex-Based Harassment, Bryant shall hold a live hearing to determine whether the alleged violation

has been shown to have occurred based upon a preponderance of the record of Relevant but not otherwise impermissible evidence compiled during the investigation and presented at the live hearing.

1. The Hearing Officer

Bryant will appoint a single trained hearing officer to preside as the decisionmaker at the live hearing. The appointed hearing officer will be trained to preside at the live hearing and make the determination of whether Sex-Based Harassment occurred. At the live hearing, the hearing officer (not the parties or their advisors) shall question the parties and witnesses in the manner described below.

At least ten (10) business days before the live hearing date, Bryant will notify the parties in writing of the assigned hearing officer. Within three (3) business days thereafter, a party may challenge Bryant's assignment of the hearing officer solely for reasons of bias or conflict of interest. Any such challenge shall be stated in writing and articulate the specific support for the alleged bias or conflict of interest. A party's failure to timely object shall be deemed as a waiver of a challenge and assent to the hearing officer presiding at the live hearing. The Title IX Coordinator will review and evaluate any submitted challenge and has the discretion to determine whether the challenge should be denied or whether a replacement hearing officer should be assigned to the live hearing.

2. Pre-hearing Conference

The hearing officer will hold a pre-hearing conference with the parties (accompanied by their advisors to discuss the hearing procedures, order of evidence, the parties or witnesses who will appear and testify, proposed questions to be posed to the parties or witnesses during the hearing, and any evidentiary or procedural matters requiring attention to ensure the efficiency and fairness of the live hearing. The hearing officer shall ensure that the parties have equal opportunity to participate in the pre-hearing conference. The hearing officer has the discretion to meet with the parties separately or jointly, but must ensure that each party has a full and equal right to participate and raise any issues in the pre-hearing conference.

3. General Rules of the Live Hearing

The live hearing shall not occur any earlier than at least ten (10) business days after the parties have received the finalized investigative report.

Each party must have an advisor at the live hearing. If a party does not have an advisor to attend the live hearing, Bryant will provide an advisor to the party free of charge. Before the hearing, the party should notify the Title IX Coordinator as promptly as possible of the need to have an advisor appointed.

The Title IX Coordinator will select the date of the live hearing based upon the availability of the hearing officer and will consider the parties' academic and/or work schedules as reasonably practicable. The Title IX Coordinator shall have the right to set the hearing date to ensure promptness and equity, with the hearing officer's availability being the primary consideration.

Bryant will conduct the live hearing with the parties physically present in the same geographic location or, at Bryant's discretion or upon the request of either party, will conduct the live hearing with the parties physically present in separate locations with technology enabling the hearing officer and parties to simultaneously see and hear the party or witness while that person is speaking.

The hearing officer shall preside in a manner ensuring that only Relevant and not otherwise impermissible evidence is presented.

There will be an audio recording of the hearing created of the hearing, which will be made available to the parties for inspection and review upon request following the live hearing.

All participants, including the parties, advisors, and witnesses must behave in an appropriate, civil, respectful, non-abusive, and courteous manner throughout the live hearing. Inappropriate, uncivil, disrespectful, abusive or disruptive behavior could lead to that person's removal from the live hearing in the hearing officer's discretion and determination.

The only persons permitted to attend the live hearing are the parties, their advisors, the witnesses, and designated personnel (with the Title IX Coordinator or designee as a mandatory University attendee). The witnesses are only to be in attendance during the time in which they are offering information or answering questions. Otherwise, witnesses must wait in a designated room (or virtual room) until reached for their appearance in the live hearing.

The live hearing is not a formal judicial proceeding. The hearing officer has the discretion to modify the hearing procedures when reasonable cause exists to do so while ensuring the fairness of the proceeding to both parties.

4. Parties' Opening Statements

At the outset of the live hearing, each party (not the party's advisor) will be permitted to make an opening statement that summarizes Relevant and not otherwise impermissible evidence. The Complainant shall proceed first, followed by the Respondent. The hearing officer has the discretion to set a reasonable and equal time limit for each opening statement (with ten (10) minutes presumed to be a reasonable amount of time). As part of the opening statement, each party must also identify their witnesses who will testify during the live hearing.

5. Questioning by The Hearing Officer

The hearing officer shall question the parties and witnesses in a manner that ensures equity in the live hearing process. The hearing officer may ask initial and follow-up questions as deemed appropriate. Advisors shall not question the parties and witnesses during the live hearing.

The hearing officer shall allow each party's advisor to propose questions for the hearing officer's consideration in the examination of a party or witness. As stated above, the pre-hearing conference is designed to address such proposed questions as practically and fully as possible before the live hearing. However, the hearing officer shall allow the parties' advisors to propose additional questions for consideration during the live hearing.

The hearing officer shall have the discretion to determine the manner, procedure, and timing in which the advisors may propose questions during the live hearing to ensure the efficiency and decorum of the hearing process. The hearing officer must ensure that each party's advisor is given an equal opportunity to propose questions for the hearing officer's review and consideration.

The hearing officer shall have the discretion not to accept and ask any proposed questions that are Relevant and not otherwise impermissible, seek to raise or explore impermissible evidence, or are harassing or unduly prejudicial in their content. The hearing officer will afford the advisor an opportunity to clarify or revise a question that is unclear or harassing, and the hearing officer will determine whether the clarification supports the asking of the question.

6. Parties' Closing Statements

At the conclusion of testimony, each party (not the party's advisor) will be permitted to make a closing statement that summarizes the Relevant and not otherwise impermissible evidence. The Complainant will proceed first, followed by the Respondent. The hearing officer will set a reasonable and equal time limit for the parties' closing statements (with fifteen (15) minutes presumes to be a reasonable amount of time).

F. Written Determination of Whether Sex Discrimination Occurred

Following the completion of the live hearing, the hearing officer will:

- Use and apply the preponderance of evidence standard to determine whether Sex-Based Harassment occurred and the Respondent is responsible for the alleged conduct. The preponderance standard of proof requires the hearing officer to evaluate Relevant and not otherwise impermissible evidence for its persuasiveness. If the hearing officer concludes that the preponderance of the evidence does not support that Sex-Based Harassment occurred, the hearing officer shall determine that the Respondent is not responsible for the alleged conduct.

- Draft a written determination of whether Sex-Based Harassment occurred under Title IX, which shall include the following:
 - A description of the alleged Sex-Based Harassment;
 - Information about the policies and procedures that Bryant used to evaluate the allegations;
 - When the hearing officer finds that Sex-Based Harassment occurred, any Disciplinary Sanctions that Bryant will impose on the Respondent, whether Remedies other than the imposition of Disciplinary Sanctions will be provided by Bryant to the Complainant, and the extent appropriate, other students identified by Bryant to be experiencing the effects of Sex-Based Harassment; and
 - Bryant's procedures and permissible bases for the Complainant and Respondent to appeal.

In the determination of appropriate Disciplinary Sanction, if a Respondent is found to be Responsible for Sex-Based Harassment, the hearing officer shall consider the range of sanctions described below and the appropriateness of the sanction under Bryant's community standards. In the sanctioning evaluation and determination, the hearing officer will consult with and consider recommendations from the Title IX Coordinator and other appropriate University officers (e.g., the Vice President of Student Affairs of Student Affairs & Dean of Students or the Vice President of Human Resource) to assess and implement Bryant's community standards.

The Title IX Coordinator shall review a draft of the hearing officer's written determination to ensure its completeness and compliance with Bryant's University Rules and policies and procedures.

Within fifteen (15) business days after the completion of the live hearing, Bryant shall notify the parties simultaneously of the finalized written determination.

Bryant will not impose Disciplinary Sanctions on a Respondent for Sex-Based Harassment prohibited by Title IX, unless there is a determination at the conclusion of the Type 2 Grievance Procedure that the Respondent engaged in prohibited Sex Discrimination. The determination regarding responsibility becomes final either on the date that Bryant provides the parties with the written determination of the result of any appeal (which will be reviewed and decided under the below-described appellate process), or, if no party appeals, the date on which an appeal would no longer be considered timely.

If there is a determination that Sex-Based Harassment occurred, the Title IX Coordinator will, as appropriate:

- Coordinate the provision and implementation of Remedies to a

Complainant and other persons Bryant identifies as having had equal access to the University's education program or activity limited or denied by Sex-Based Harassment;

- Coordinate the imposition of any Disciplinary Sanctions on a Respondent, including notification to the Complainant of any such Disciplinary Sanctions; and
- Take other appropriate prompt and effective steps to ensure that Sex Discrimination (including retaliation) does not continue or recur within Bryant's education program or activity.

Bryant will not discipline a party, witness or others participating in the Type 2 Grievance Procedure for making a false statement or for engaging in consensual sexual conduct based solely on the determination of whether Sex-Based Harassment occurred.

G. Range of Disciplinary Sanctions

Employee Respondent: Disciplinary Sanctions imposed upon a faculty or a staff member found responsible for Sex-Based Harassment in violation of Title IX, the range of appropriate disciplinary and/or corrective action shall be in accordance with personnel policies and collective bargaining agreements. Actions may range from warnings or reprimands, changes in responsibilities, suspension with or without pay, to termination of employment, depending on the magnitude and specifics of the infraction.

Student Respondent: Disciplinary Sanctions imposed upon a student found responsible for Sex-Based Harassment in violation of Title IX shall be consistent with and within the range prescribed in the Student Handbook (including its Code of Student Conduct). Such sanctions range from a warning or reprimand, probation, residence hall restrictions or eviction, suspension, expulsion, a transcript notation describing the disciplinary action, revocation of admission or degree, and withholding of a degree. More than one of the Code's sanctions may be imposed for any single violation.

H. Appeal

Either party may appeal the written determination, including any imposed Disciplinary Sanction, only on one or more of the following grounds:

- Procedural irregularity that would change the outcome;
- New evidence that would change the outcome and that was not reasonably available when the determination or dismissal was made; and
- The Title IX Coordinator, investigator, or decisionmaker had a conflict of interest or bias for or against Complainants or Respondents generally or the individual Complainant or Respondent that would change the outcome.

Appeals must be submitted in writing to the Title IX Coordinator within five (5) business days after the issuance of the written determination, unless the appeal period is mutually extended for both parties for good cause. The party must specify the grounds and support for the appeal. An untimely appeal will be rejected and not considered by the University, absent compelling and/or exigent circumstances that directly impacted the timeliness of the filing and that the Title IX Coordinator deems appropriate to justify the acceptance of the appeal.

If a party appeals the written determination whether Sex-Based Harassment occurred or the appropriateness of an imposed Disciplinary Sanction, the Title IX Coordinator will:

- Notify the parties in writing of Bryant's receipt of the appeal;
- Implement the appeal procedures equally for the parties;
- Ensure the decisionmaker for the appeal has been trained consistent with Bryant's policies and procedures to ensure compliance with Title IX's requirements;
- Communicate to the parties in writing that Bryant will provide a party with the opportunity to submit a written response to the other party's appeal within five (5) business days;
- Notify the party simultaneously regarding any material developments during the course of the appellate review and upon the determination of the appeal.

Upon the submission of a party's response to an appeal, the Title IX Coordinator shall promptly (within no more than three (3) business days) direct the appeal to the attention of the Vice President of Student Affairs & Dean of Students in appeals involving a student Respondent, the Provost in faculty Respondent cases, and the Vice President for Human Resources in non-faculty employment Respondent cases. If one of these officers had previously heard and decided an appeal of a dismissal decision during the course of the Type 2 Grievance Procedure, Bryant shall assign the appeal to a proper and trained designee to serve as the appeals officer.

The appeals officer will issue a written decision within fifteen (15) business days after the officer's receipt of the appeal, describing the result and the rationale. The appeal's officer may deny the appeal or grant it in whole or in part. If an appeal is granted in whole or in part, the appeals officer may modify the determination or sanction, if any, and/or determine that further proceedings (such as additional investigation or reopen live hearing) is proper.

XVI. The Role of a Party's Advisor

In a Type 1 Grievance Procedure, Bryant has the discretion to determine whether

the parties shall have the right to an advisor at meetings and proceedings. Bryant shall make such determinations based upon the nature of the allegations, the totality of the circumstances, and the status of the involved parties. In matters pertaining to employees, Bryant will act in accordance with the representation requirements under any of its collective bargaining agreements.

In a Type 2 Grievance Procedure, parties are allowed to have an advisor as a matter of right.

The following requirements apply to an advisor's role:

- During any meeting and/or investigation interview, advisors may not speak for or on behalf of the Complainant or Respondent. While an advisor cannot speak for or on behalf of the party, reasonable time will be granted for the advisor and the party to confer, if requested, by the official conducting the meeting, interview, or live hearing.
- As stated above during the live hearing in the Type 2 Grievance Procedure, the hearing officer, not a party's advisor, shall question the parties and witnesses. The advisor is entitled to propose questions for the hearing officer's consideration in the manner stated above in connection with the live hearing process.
- The University expects that the advisor will act in a respectful manner and reserves the right to remove an advisor who fails to respect the expected decorum of any meeting, interview, or live hearing. Should an advisor be excluded from a live hearing in the Type 2 Grievance Procedure, the party will be able to choose a new advisor, or one will be provided by the University at the hearing.

XVII. Retaliation Prohibited

As stated and delineated in Bryant's Title IX Policy, the University prohibits retaliation, including peer retaliation, in its education program or activity.

Neither Bryant nor any other person may intimidate, threaten, coerce, or discriminate against any person for the purpose of interfering with any right or privilege secured by Title IX, or because the person has reported information, complained of Sex Discrimination, testified, assisted, or participated in or refused to participate in an investigation, proceeding or hearing under this policy (including an Informal Resolution Process or a Grievance Procedure).

Bryant may require an employee or other University personnel authorized to provide aid, benefit, or service under its education program or activity to participate as a witness in, or otherwise assist in, an investigation, proceeding, or hearing under this policy.

When Bryant has information about conduct that may reasonably constitute retaliation under its Title IX Policy and these Title IX procedures, it will provide

appropriate Supportive Measures to the affected persons.

Bryant will access any Complaint of prohibited Title IX retaliation to determine whether it must be investigated and determined under the Type 1 or Type 2 Grievance Procedure. If a retaliation complaint is consolidated with a Complaint of Sex-Based Harassment (involving a student Complainant or a student Respondent), then Bryant will address the retaliation Complaint through the Type 2 Grievance Procedure.

XVIII. Recordkeeping

Consistent with the Title IX Regulations (34 CFR § 106.8(f)), Bryant will maintain the following records for a period of at least seven (7) years:

- For each Complaint of Sex Discrimination, records of the Informal Resolution Process, the Grievance Procedure (including the investigation, determination, live hearing and appeal), and the resulting outcome;
- Any actions, including any Supportive Measures, taken in response to a report of Sex Discrimination; and
- All materials used to train its Title IX coordinators, investigators, decision-makers, facilitators of informal resolutions, and appeals officers, as well as all other trainings of employees required under the Title IX Regulations. (Training materials will be made available upon request by members of the public).

XIX. Policy Revisions

Bryant reserves the right to amend this policy and/or its procedures in its sole discretion at any time, provided that any such amendments shall be consistent with the University's Title IX obligations.

Sex Offender Registry and Access to Related Information

The federal Campus Sex Crimes Prevention Act requires institutions of higher education to issue a statement advising the campus community where law enforcement agency information provided by a State concerning registered sex offenders may be obtained. It also requires sex offenders already required to register in a State to provide notice, as required under State law, of each institution of higher education in that State at which the person is employed, carries on a vocation, or is a student.

In the State of Rhode Island convicted sex offenders must register with the local police department in their municipality. In Smithfield sex offenders must register with the Smithfield Police Department. Every person convicted on or after July 1, 1997, including juveniles sentenced as adults of an offense for which registration is required shall be required as a part of the sentence imposed upon conviction to

register and reregister with the Smithfield Police Department.

In addition, all persons convicted of violations under the laws of the United States or any other state substantially similar to an offense for which registration is required shall provide to the local agency all necessary information within ten days of establishing a residence in the Town of Smithfield. Any person required to register shall also be required to reregister within ten days following any change of residence, whether within or without the Town of Smithfield.

Persons wanting information related to the sex offender's registry and access to related information must contact the Smithfield Police Department at 231-2500, or obtain the information directly at www.pardoleboard.ri.gov.

Victims of Crimes of Violence or Non-forcible Sex Offenses

Bryant University will, upon written request, disclose to the alleged victim of a crime of violence (as that term is defined in section 16 of title 18 United States Code), or a non-forcible sex offense, the report on the results of any disciplinary proceeding conducted by the University 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 the purposes of this paragraph.

Campus Security Authorities

The Clery Act requires institutions of higher learning to identify persons on their campuses who are mandated reporters of crime. Specifically, the Act requires that the university designates persons who have "significant responsibility for student and campus activities but do not have significant counseling responsibilities" to report crimes that are made known to them. Based on the criterion, the following Bryant officials at least should report instances of crime:

- Vice President for Student Affairs and Dean of Students;
- Executive Director of Public Safety and all public safety officers;
- Associate Deans of Students;
- Director of Residence Life, Associate Director of Community Standards Community Directors, and Resident Assistants;
- Campus Engagement staff;
- Director of Athletics, Associate Directors of Athletics, Head Coaches, and Athletic Trainers;
- Director of the Center for Diversity and Inclusion;
- Director of the Hochberg Women's Center;

- Director of Health Services.

The above list does not imply that others should not or cannot report crime on our campus or that they do not have an ethical or moral responsibility to do so.

Persons Exempted From Mandated Reporting

Because of their particular responsibilities that may require “significant counseling responsibility,” persons working in the following offices are exempt from mandated reporting of crimes known to them:

- Pastoral and professional counselors working in Counseling Services; Campus Ministry

Timely Warning

When a criminal incident occurs on campus that, in the judgment of the University’s senior leadership, constitutes an ongoing or continuing threat to the campus community a crime alert will be sent to notify the community. The facts contained in the alert will be provided by the Director of Public Safety or his designee and authored by the Executive Director of University Relations or her designee. Prior to the release of the warning to the community it must have the prior approval of the Vice President of Student Affairs or the Executive Assistant to the President. Thereafter, the notice will be disseminated by the Department of Public Safety by using one or a combination of the following methods: Internet Protocol phones (IP); e-mail; text and cell phone voicemail messages. Examples of such emergency incidents include acts of criminal violence that broadly threaten the safety of the community on campus.

Missing Student Notification

Bryant University will activate the missing student notification process when it is determined that a student has been missing for more than 24 hours unless circumstances warrant a faster implementation.

The following is a list of the areas or departments to which persons should report that a student is missing. The report should be made to any staff member of the Department of Public Safety, Residence Life (including resident assistant), or Student Affairs.

Each resident student has the option to register a confidential contact person to be notified in the event that the student is determined to be missing. Only authorized campus officials and law enforcement officers in furtherance of a missing person investigation will be given access to this information. The custodial parents or legal guardians of students younger than 18 years of age and not emancipated will be notified along with their identified contact person. When an official report of a missing student has been filed the Department of Public

Safety will be notified. Whether a student opts to register a contact or not, if a student is determined to be missing the Department of Public Safety will notify the Smithfield Police Department.

Bryant University recommends that all students register confidential contact information. To register a contact person the “missing person code” has been programmed into the BANNER self service so that students can add this information to their emergency contacts using their own banner accounts.

Procedures

If a student is determined to be missing an official report will be initiated with the Department of Public Safety (DPS). DPS will coordinate efforts to locate the student. Initial attempts will include personal contacts with roommates and known acquaintances. Residence Life staff will be called upon to inquire about the missing student. That office maintains records with resident students’ personal cellular phone numbers. They will be asked to initiate calls to the missing student. If those attempts prove futile, class schedules will be sought and interviews with relevant professors will occur to determine whether the missing student has been recently present in their classes. DPS will notify the Smithfield Police and ask them to inquire if any law enforcement agency knows the whereabouts of the missing student. The director of health services, or her designee, will be asked to inquire at area hospitals to attempt to locate the student.

The person listed as the contact person in the missing students’ file will be notified and interviewed. Custodial parents or legal guardians of students who are younger than 18 years of age and not emancipated will also be notified. If available, DPS will print a copy of the student’s picture using the identification card (ID) system and share it with persons who have a legitimate right.

Thereafter, all efforts to find the student will continue by providing support and information to the Smithfield Police until the student is found.

Emergency Notification

Notification Procedures

The Emergency Notification System (ENS) at Bryant University is managed by the Department of Public Safety (DPS). In the event of a significant emergency or dangerous situation involving an immediate threat to the campus community, DPS will make immediate notification upon confirmation.

Confirmation of an emergency is made when notice of such is made to the Department of Public Safety or observed, firsthand, by one or more of its personnel and there is either obvious evidence to suggest that the emergency is valid or is confirmed valid upon investigation.

Upon confirmation all segments of the community will be notified immediately. Those segments include: students, faculty, staff and guests. The content of the notification has been pre-scripted into different emergency messages. The on-duty Department of Public Safety supervisor is responsible for selecting the appropriate message relevant to the existing emergency and initiating the ENS. Once the appropriate message is selected, the supervisor will direct his duty officers to initiate all components of the ENS. The components of the ENS include one or a combination of the following: Internet protocol phones (IP); Public Address System (PA); cell phone messaging (voice and text); computer override and personal contacts.

Bryant University will, without delay, and after confirmation that a true and valid emergency exists, determine the appropriate content of the notification and initiate the notification system through its Department of Public Safety (DPS). However, if in the professional judgment of responsible authorities the initiation of the notification system compromises the efforts to assist a victim or contain the emergency or otherwise mitigate the emergency, it will not be initiated.

Although Bryant University considers notification of its on-campus community foremost, efforts to notify the larger community will also be made. That constituency includes external groups such as parents, Board of Trustees, alums, state and local officials, and the media. Notification to them will be made via one or a combination of the following: the Bryant University homepage website (www.bryant.edu/Bryant) and the DPS Information Line (401-232-6002), or through social media sites such as Twitter and other platforms. All will be used to provide current and continuous updates and will act as central reference points for accurate information. This method is useful for those both on- and off-campus communities. In addition to these sources of information, Bryant University will also utilize its' emergency web page (emergency.bryant.edu) to provide more detailed updates in the event of an emergency.

At a minimum, one emergency drill is conducted per calendar year to test the Emergency Notification System. The drill is announced giving the specific date and time. Typically, the test drill will be announced through a Bryant Alert email but could also be announced through the Rave Alert system. Upon activation of the ENS, assigned personnel from one or a combination of the following groups critiques the drill and ENS; Department of Public Safety, Residence Life, Bryant Evacuation Safety Team (BEST), and other staff as requested. At the conclusion of the drill and test of the ENS the personnel that are assigned to participate shall critique both, forward a written assessment form to the director of public safety. The director collects the data and prepares a written report which is forwarded to the Executive Assistant to the President. documenting a description of the exercise, the date and time the test started and ended, and whether the test was announced or unannounced.

Fire Safety Reporting

The Higher Education Opportunity Act (Public Law 110-315) requires institutions of higher education that maintain student housing facilities to produce an annual fire safety report outlining fire safety practices, standards, and fire-related on-campus statistics. The following public disclosure report details the information required by this law as it relates to Bryant University.

Bryant University is committed to providing the best possible fire safety protection program for each on-campus housing facility. For the purposes of this report the following definitions are active:

- **Fire** – Any instance of open flame or other burning in a place not intended to contain the burning or in an uncontrolled manner.
- **Fire drill** – A supervised practice of a mandatory evacuation of a building for a fire.
- **Cause of fire** – The factor or factors that give rise to a fire. The causal factor may be, but not limited to, the result of an intentional or unintentional action, mechanical failure or act of nature.
- **Fire-related injury** – Any instance in which a person is injured as a result of a fire, including an injury sustained from a natural or accidental cause while involved in fire control, attempting rescue, or escaping from the dangers of the fire. The term “person” may include students, employees, visitors, firefighters, or any other individuals.
- **Fire-related death** – Any instance in which a person is killed as a result of a fire, including death resulting from a natural or accidental cause while involved in fire control, attempting rescue, or escaping from the dangers of a fire. Dies within 1 year of injuries sustained as a result of the fire.
- **Fire safety system** – Any mechanism or system related to the detection of a fire, the warning resulting from a fire, or the control of a fire. This may include sprinkler systems or other fire extinguishing system, fire detection devices, stand-alone smoke alarms, devices that alert one to the presence of a fire, such as horns, bells, or strobe lights, smoke-control and reduction mechanisms and fire doors and walls that reduce the spread of a fire.
- **Value of property damage** – The estimated values of the loss of the structure and contents, in terms of the cost of replacement in like kind and quantity. The estimate should include contents damaged by fire, and related damages caused by smoke, water, and overhaul; however, it does not include indirect loss, such as business reduction.
- **On-campus student housing facility** – Any student housing facility that

is owned or controlled by the institution, or is located on property that is owned or controlled by the institution, and is within the reasonably contiguous geographic area that makes up the campus.

- **Fire log** – A written record of reportable fires in student housing facilities chronicling the nature of the fire, date, time and general location. All student housing facilities at Bryant are protected with integrated fire sprinkler systems and all are equipped with redundant fire alarm monitoring systems that are monitored 24 hours by the Department of Public Safety and simultaneously by the Smithfield Fire Department. Municipal radio master fire alarms are received simultaneously by the Department of Public Safety and by the Smithfield Fire Department. Student housing facilities are equipped with illuminated exit signs, pull stations, smoke detectors, heat detectors, carbon monoxide detectors, and fire extinguishers. An automatic fire department response is triggered upon the activation of any active fire alarm from any university building.

Residence Hall Fire Drills

Fire drills within the residence halls are conducted twice each semester. When conducted, drills are supervised by the Department of Public Safety (DPS) through the fire safety coordinator and its officers. The drill is pre-scheduled by DPS with coordination with the Smithfield Fire Department (SFD). The drills are not announced to the residents beforehand. It is mandatory for all residents to evacuate the building upon hearing the fire alarm. Failure to exit a building can result in a fire safety fine and a written report being forwarded for disciplinary action.

Evacuation

Evacuation route maps are posted in most resident rooms showing the closest egress. Only a small amount of rooms do not have the maps. Efforts are underway to equip them with route maps. Evacuation routes are being updated to reflect changes in floor plans. Students are assigned and instructed beforehand to a specific point of assembly outside the hall when a drill or an actual fire occurs.

Fire Safety Education

The Department of Public Safety's fire safety coordinator provides on-going education through the academic year pertaining to fire safety. Before the beginning of the fall semester the coordinator meets with the resident directors and assistants and instructs them in a variety of preventative measures as well as how to respond to actual (incipient) fires. Attendees learn how to expel a fire extinguisher to respond to incipient fire situations and instructed to evacuate in all other fire circumstances. In all situations they are instructed that if the use of a fire extinguisher poses an endangerment they should exit the residence hall and notify the Department of Public Safety.

Fire safety regulations are also included annually in the Student Handbook.

Violations of fire safety regulations are reported quickly by either Residence Life or DPS staff and are quickly corrected. These policies are discussed with residents by the Residence Life staff. Thereafter, the coordinator responds to invitations to instruct various groups which can include entire residential floors or entire residence halls.

Faculty and staff are educated about fire safety issues upon request throughout the calendar year.

Open Flames

Any open flame source inside residence halls or townhouses is banned, including but not limited to candles, cigarettes or other smoking material, incense, propane or charcoal grills or hot plates. Candles are prohibited from ownership or use inside the residence halls and townhouses. Violations of the ban of flammable source materials inside the residence halls and townhouses, including smoking, burning or ownership of candles will be issued a Fire, Health and Safety citation.

Electrical Appliances and Outlets

Although Bryant allows portable electrical appliances they cannot be plugged into 2-prong extension cords, outlet splitters, or three-way “octopus plugs” in the residence halls and townhouses. The only extension cords that are permitted are 3-prong UL approved and contain a circuit breaker. No more than two items may be plugged into the same electrical outlet.

Future Fire Safety Improvements

Bryant University annually reviews the fire systems in student housing facilities and makes upgrades and repairs or revisions. However, when problems are identified and reported they are responded to quickly. In the future Bryant will install evacuation route maps in the small percentage of rooms lacking them.

Student Right-To-Know and Campus Security Act Crime Statistics 2021-2023

CRIMINAL OFFENSES	YEAR	ON-CAMPUS PROPERTY	ON-CAMPUS RESIDENTIAL	NON CAMPUS PROPER-	PUBLIC PROPERTY	UNFOUNDED
Murder / non-negligent manslaughter	2021	0	0	0	0	0
	2022	0	0	0	0	0
	2023	0	0	0	0	0
Robbery	2021	0	0	0	0	0
	2022	0	0	0	0	0
	2023	0	0	0	0	0
Aggravated assault	2021	0	0	0	0	0
	2022	0	0	0	0	0
	2023	1	0	0	0	0
Burglary	2021	0	0	0	0	0
	2022	0	0	0	0	0
	2023	1	0	0	0	0
Motor vehicle theft	2021	0	0	0	0	0
	2022	0	0	0	0	0
	2023	0	0	0	0	0
Arson	2021	0	0	0	0	0
	2022	0	0	0	0	0
	2023	0	0	0	0	0
SEX OFFENSES	YEAR	ON-CAMPUS PROPERTY	ON-CAMPUS RESIDENTIAL	NON CAMPUS PROPERTIES	PUBLIC PROPERTY	UNFOUNDED
OFFENSES						
Rape	2021	12	12	0	0	0
	2022	6	6	0	0	0
	2023	5	5	0	0	0
Fondling	2021	6	6	0	0	0
	2022	3	3	0	0	0
	2023	2	2	0	0	0
Incest	2021	0	0	0	0	0
	2022	0	0	0	0	0
	2023	0	0	0	0	0
Statutory Rape	2021	0	0	0	0	0
	2022	0	0	0	0	0
	2023	0	0	0	0	0

Bryant University does not own off-campus property

Violence Against Women Act (VAWA) Offenses	YEAR	ON-CAMPUS PROPERTY	ON-CAMPUS RESIDENTIAL	NON CAMPUS PROPERTIES	PUBLIC PROPERTY	UNFOUNDED
OFFENSES						
Domestic Violence	2021	0	0	0	0	0
	2022	2	1	0	0	0
	2023	2	2	0	0	0
Dating Violence	2021	2	1	0	0	0
	2022	0	0	0	0	0
	2023	1	1	0	0	0
Stalking	2021	2	0	0	0	0
	2022	1	0	0	0	0
	2023	1	1	0	0	0
ARRESTS AND DISCIPLINARY REFERRALS FOR CRIMINAL VIOLATIONS						
Arrests: Weapon Law Violations	2021	0	0	0	0	0
	2022	0	0	0	0	0
	2023	0	0	0	0	0
Arrests: Drug Law Violations	2021	4	4	0	0	0
	2022	1	1	0	0	0
	2023	0	0	0	0	0
Arrests: Liquor Law Violations	2021	0	0	0	0	0
	2022	2	2	0	0	0
	2023	1	0	0	0	0
Disciplinary Referrals: Weapon Law Violations	2021	2	1	0	0	0
	2022	0	0	0	0	0
	2023	0	0	0	0	0
Disciplinary Referrals: Drug Law violations	2021	0	0	0	0	0
	2022	0	0	0	0	0
	2023	0	0	0	0	0
Disciplinary Referrals: Liquor Law violations	2021	331	326	0	0	0
	2022	185	182	0	0	0
	2023	202	195	0	0	0

Hate crime information:

2023: One vandalism complaint in a residence hall that involved a racial epithet.

2022: One vandalism complaint in a residence hall that involved a racial epithet.

2021: One on-campus Hate Crime that consisted of a vandalism incident based on religious bias in which a swastika was written on an elevator wall.

Fire Safety Statistics 2021-2023

HEOA Fire Incident Log – Year 2023

NAME OF RESIDENTIAL BUILDING	DATE AND TIME OF FIRE	FIRE CATEGORY ⁴	CAUSE OF FIRE	NUMBER OF INJURIES REQUIRING TREATMENT AT A MEDICAL FACILITY	# OF DEATHS RELATED TO FIRE	VALUE OF PROPERTY DAMAGE CAUSED BY FIRE
Charlestown	NA	NA	NA	0	0	0
Richmond	NA	NA	NA	0	0	0
Kilcup	NA	NA	NA	0	0	0
Westerly	NA	NA	NA	0	0	0
Hopkinton	NA	NA	NA	0	0	0
Exeter	NA	NA	NA	0	0	0
Coventry	NA	NA	NA	0	0	0
Scituate	NA	NA	NA	0	0	0
Tiverton	NA	NA	NA	0	0	0
Providence	NA	NA	NA	0	0	0
Jamestown	NA	NA	NA	0	0	0
Cumberland	NA	NA	NA	0	0	0
Lincoln	NA	NA	NA	0	0	0
Warren	NA	NA	NA	0	0	0
Bristol	NA	NA	NA	0	0	0
Barrington	NA	NA	NA	0	0	0
Newport	NA	NA	NA	0	0	0
A BLOCK	NA	NA	NA	0	0	0
B BLOCK	NA	NA	NA	0	0	0
C BLOCK	NA	NA	NA	0	0	0
D BLOCK	NA	NA	NA	0	0	0
E BLOCK	NA	NA	NA	0	0	0
F BLOCK	NA	NA	NA	0	0	0
G BLOCK	NA	NA	NA	0	0	0
H BLOCK	NA	NA	NA	0	0	0
J BLOCK	NA	NA	NA	0	0	0
K BLOCK	NA	NA	NA	0	0	0
L BLOCK	NA	NA	NA	0	0	0
M BLOCK	NA	NA	NA	0	0	0
N BLOCK	NA	NA	NA	0	0	0
O BLOCK	NA	NA	NA	0	0	0
P BLOCK	NA	NA	NA	0	0	0

HEOA Fire Incident Log – Year 2022

NAME OF RESIDENTIAL BUILDING	DATE AND TIME OF FIRE	FIRE CATEGORY ⁴	CAUSE OF FIRE	NUMBER OF INJURIES REQUIRING TREATMENT AT A MEDICAL FACILITY	# OF DEATHS RELATED TO FIRE	VALUE OF PROPERTY DAMAGE CAUSED BY FIRE
Charlestown	NA	NA	NA	0	0	0
Richmond	NA	NA	NA	0	0	0
Kilcup	NA	NA	NA	0	0	0
Westerly	NA	NA	NA	0	0	0
Hopkinton	NA	NA	NA	0	0	0
Exeter	NA	NA	NA	0	0	0
Coventry	NA	NA	NA	0	0	0
Scituate	NA	NA	NA	0	0	0
Tiverton	NA	NA	NA	0	0	0
Providence	NA	NA	NA	0	0	0
Jamestown	NA	NA	NA	0	0	0
Cumberland	NA	NA	NA	0	0	0
Lincoln	NA	NA	NA	0	0	0
Warren	NA	NA	NA	0	0	0
Bristol	NA	NA	NA	0	0	0
Barrington	NA	NA	NA	0	0	0
Newport	NA	NA	NA	0	0	0
A BLOCK	NA	NA	NA	0	0	0
B BLOCK	NA	NA	NA	0	0	0
C BLOCK	NA	NA	NA	0	0	0
D BLOCK	NA	NA	NA	0	0	0
E BLOCK	NA	NA	NA	0	0	0
F BLOCK	NA	NA	NA	0	0	0
G BLOCK	NA	NA	NA	0	0	0
H BLOCK	NA	NA	NA	0	0	0
J BLOCK	NA	NA	NA	0	0	0
K BLOCK	NA	NA	NA	0	0	0
L BLOCK	NA	NA	NA	0	0	0
M BLOCK	NA	NA	NA	0	0	0
N BLOCK	NA	NA	NA	0	0	0
O BLOCK	NA	NA	NA	0	0	0
P BLOCK	NA	NA	NA	0	0	0

HEOA Fire Incident Log – Year 2021

NAME OF RESIDENTIAL BUILDING	DATE AND TIME OF FIRE	FIRE CATEGORY ⁴	CAUSE OF FIRE	NUMBER OF INJURIES REQUIRING TREATMENT AT A MEDICAL FACILITY	# OF DEATHS RELATED TO FIRE	VALUE OF PROPERTY DAMAGE CAUSED BY FIRE
Charlestown	NA	NA	NA	0	0	0
Richmond	NA	NA	NA	0	0	0
Kilcup	NA	NA	NA	0	0	0
Westerly	NA	NA	NA	0	0	0
Hopkinton	NA	NA	NA	0	0	0
Exeter	NA	NA	NA	0	0	0
Coventry	NA	NA	NA	0	0	0
Scituate	NA	NA	NA	0	0	0
Tiverton	NA	NA	NA	0	0	0
Providence	NA	NA	NA	0	0	0
Jamestown	NA	NA	NA	0	0	0
Cumberland	NA	NA	NA	0	0	0
Lincoln	NA	NA	NA	0	0	0
Warren	NA	NA	NA	0	0	0
Bristol	NA	NA	NA	0	0	0
Barrington	NA	NA	NA	0	0	0
Newport	NA	NA	NA	0	0	0
A BLOCK	NA	NA	NA	0	0	0
B BLOCK	NA	NA	NA	0	0	0
C BLOCK	NA	NA	NA	0	0	0
D BLOCK	NA	NA	NA	0	0	0
E BLOCK	NA	NA	NA	0	0	0
F BLOCK	NA	NA	NA	0	0	0
G BLOCK	NA	NA	NA	0	0	0
H BLOCK	NA	NA	NA	0	0	0
J BLOCK	NA	NA	NA	0	0	0
K BLOCK	NA	NA	NA	0	0	0
L BLOCK	NA	NA	NA	0	0	0
M BLOCK	NA	NA	NA	0	0	0
N BLOCK	NA	NA	NA	0	0	0
O BLOCK	NA	NA	NA	0	0	0
P BLOCK	NA	NA	NA	0	0	0

²Category 1 = Unintentional

Category 2 = Intentional

Category 3 = Undetermined

Definitions

Aggravated Assault: An unlawful attack by one person upon another wherein the offender uses a weapon, or displays it in a threatening manner, or 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. An unsuccessful attempt to commit a murder would be classified as an aggravated assault.

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. Only fires determined through investigation to have been willfully or maliciously set are classified as arson. Fires of suspicious or unknown origin are excluded.

Burglary (breaking and entering): The unlawful entry into a building or other structure with the intent to commit a felony or a theft. Forced entry is not a required element of the offense, so long as the entry is unlawful (constituting a trespass). It may be accomplished via an unlocked door or window. Included are unsuccessful attempts where force is employed, or where a perpetrator is frightened off while entering an unlocked door or climbing through an open window.

Consent: See Title IX Sex Discrimination Policy

Dating Violence: See Title IX Sex Discrimination Policy

Domestic Violence: See Title IX Sex Discrimination Policy

Drug Abuse Violation: Violation of laws prohibiting the production, distribution, and/or use of certain controlled substances and the equipment or devices utilized in their preparation or use.

Hate Crime: A hate crime is a criminal act against a person or property in which the perpetrator chooses the victim because of the victim's real or perceived race, religion, national origin, ethnicity, sexual orientation, disability, gender, or gender identity. The following crimes will be reported only if they occurred as a Hate Crime:

- **Larceny/theft** - The unlawful taking, carrying, leading, or riding away of property from the possession or constructive possession of another.
- **Simple assault** - A violent physical attack intended to do bodily injury to another.
- **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 an actual physical attack.

- **Vandalism** - To willfully or maliciously destroy, injure, disfigure, or deface any public or private property, real or personal, without the consent of the owner or person having custody or control.
- **Liquor Law Violation:** Violation of laws or ordinances prohibiting the manufacture, sale, purchase, transportation, possession, or use of alcoholic beverages (with the exception of “driving under the influence” or “drunkenness”).

Manslaughter: The non-willful killing of one human being by another.

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

Murder: The willful (non-negligent) killing of one human being by another.

Robbery: The taking, or attempting to take, of anything of value under confrontational circumstances from the control, custody, or care of another person or persons by force, or threat of force, violence, or by putting the victim in fear of immediate harm.

Sex Offenses: See Title IX Sex Discrimination Policy

Stalking: See Title IX Sex Discrimination Policy

Weapons Possessions: Violations 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.



Bryant University Campus

- | | | | | |
|---|---|--|--|---|
| 1 Academic Hall (Unistructure) | 10 Elizabeth and Malcolm Chace Wellness and Athletic Center | 16 Jamestown House (left) Providence House (right) | 26 Koffler Center and Communications Complex | 39 Townhouse E |
| 2 Administrative Hall (Unistructure) | 11 George E. Bello Center for Information and Technology | 17 Lincoln House (left) Cumberland House (right) | 27 Management Resource Center (Unistructure) | 40 Townhouse F |
| 3 Admission Office (Unistructure) | 12 Charlestown House (left) Richmond House (right) | 18 Warren House | 28 Physician Assistant Learning Center | 41 Townhouse G |
| 4 The Archway | 13 Kilcup House (left) Westerly House (right) | 19 Bristol House / Women's Living and Learning Community | 29 The Callahan House/ President's Residence | 42 Townhouse H |
| 5 Conaty Park | 14 Hopkinton House Exeter House | 20 Barrington House | 30 Unistructure, Rotunda | 43 Townhouse J |
| 6 Michael E. '67 and Karen L. Fisher Student Center | 15 Tiverton House (left) Scituate House (center) Coventry House (right) | 21 Newport House | 31 Smith House | 44 Townhouse K |
| 7 David M. '85 and Terry Beirne Stadium Complex | | 22 Health Services | | 45 Townhouse L |
| 8 Campus Entrance | | 23 Ronald K. and Kati C. Machley Interfaith Center | | 46 Townhouse M |
| 9 Douglas and Judith Krupp Library | | 24 John H. Chafee Center for International Business | | 47 Townhouse N |
| | | 25 Joseph Mowry Homestead | | 48 Townhouse O |
| | | | | 49 Townhouse P |
| | | | | 50 Facilities Department |
| | | | | 51 Track and Turf Complex |
| | | | | 52 U.S.-China Institute |
| | | | | 53 Welcome Station |
| | | | | 54 Bulldog Strength and Conditioning Center |
| | | | | 55 Sports Medicine and Training Center |
| | | | | 56 Conaty Indoor Athletic Center |



57 Quinlan/Brown
Academic Innovation
Center

Parking

- Lot A: Faculty/Staff/
Commuters
- Lot B: Faculty/Staff/
Commuters
- Lot C: General Parking
- Lot D: Upper Class Student
(Sophomore/Junior)
+ General parking
- Lot E: Faculty/Staff and
Reserved Guest
Parking
- Lot F: Upper Class Student
(Sophomore/Junior)
parking
- Lot G: Bryant Leadership
Council/

- Handicap parking
- Lot H: Upper Class Student
(Sophomore/Junior)
parking
- Lot I: Upper Class Student
(Sophomore/Junior)
parking
- Lot J: Upper Class Student
(Sophomore/Junior)
parking
- Lot K: Chafee Center
staff parking
- Lot L: Dining Services/
General parking
- Lot M: Senior Student
parking
- Lot N: Senior Student
parking
- Lot O: Senior Student
parking

- Lot P: Bryant Leadership
Council/
Physician Assistant
Program parking
- Lot Q: Bryant Leadership
Council/
Handicap parking
- Lot R: Reserved parking
- Lot S: Facilities Department
parking

Emergencies

232-6911

To report a crime call the Department of Public Safety
(DPS)

232-6001