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About Arcadia

History of Arcadia University and The College of Global Studies

Arcadia University

Founded in 1853, Arcadia University is a top-ranked private university in Greater Philadelphia offering bachelor's, master's, and doctoral degrees. Arcadia is a national leader in study abroad and international education. The 2017 Open Doors report names Arcadia University #1 in the nation for undergraduate students studying abroad for the eighth consecutive year, while U.S. News & World Report ranks Arcadia among the top regional universities in the north and lauds Arcadia's study abroad programs. Arcadia University promises a distinctively global, integrative, and personal learning experience that prepares students to contribute and lead in a diverse and dynamic world.

The College of Global Studies

The College of Global Studies at Arcadia University (“The College of Global Studies” or “The College”) is one of three Colleges and three Schools which constitute Arcadia University.

The College is known internationally for academically sound and experientially rich study abroad programs. The College offers a wide range of academic programs at Arcadia study and research centers as well as at leading universities around the world. In addition to more than 130 study abroad programs in 12 countries, Arcadia offers a co-curricular learning program that integrates in-classroom learning with the out of classroom context and experience of students.

The College operates physical centers in eight cities: Athens, Barcelona, Cape Town, Dublin, Edinburgh, Granada, London, and Rome. In addition, we have six virtual centers that operate without bricks and mortar, but fulfill the local curricular and pedagogical needs in Australia, New Zealand, Cuba, and Chile. Nearly 3,000 students from about 250 colleges and universities participate in Arcadia University's programs abroad each year. Arcadia continuously strives to provide the highest level of support and service to its program participants wherever they are in the world.

Arcadia University Mission Statement

Arcadia University provides a distinctively global, integrative and personal learning experience for intellectually curious undergraduate and graduate students in preparation for a life of scholarship, service and professional contribution.

The College of Global Studies at Arcadia University Mission Statement

The College of Global Studies at Arcadia University prepares students for lives of informed contribution in a rapidly changing global society. Through strategic institutional partnerships, innovative academic, experiential and co-curricular programming expressed in diverse and challenging global contexts, students learn to think critically, observe skillfully, reflect thoughtfully and participate meaningfully.

The College of Global Studies at Arcadia University Regulations and Policies

This *Handbook* contains the regulations, policies and judicial procedures of The College, including the Code of Academic Responsibility, Code of Conduct, Housing, Health and Safety, Discrimination and Sexual Harassment, Alcohol and Drug Use, and Technology Abuses policies. However, a student participating in a program with The College of Global Studies is subject to, and should be familiar with, not only the regulations, policies, and procedures of The College, but also those of their host institution and home institution. While this *Handbook* details the regulations and policies of The College, it does not in any way foreclose or alter the rights of a student's host institution and home institution to separately hold the student accountable under their policies and procedures.

The College of Global Studies' regulations and policies may be stricter than or different from those of a student's home institution because of the broader consequences of student conduct when a student is participating in a study abroad program. In the case of any differences between The College's regulations and policies and those of the host institution or home institution, the regulations and policies of The College govern participants in its programs, unless otherwise stated in this *Handbook*. Additionally, the specific policies and procedures of The College of Global Studies may differ from Arcadia University's general policies. In the case of any differences between Arcadia University's regulations and policies and those of The College, the regulations and policies of The College govern participants in its programs, unless otherwise stated in this *Handbook*.

Reservations of Rights

The College of Global Studies reserves the sole right to interpret, add, delete, or modify at any time all provisions contained in this *Handbook*. Revisions and updated information concerning changes in policy will be available on The College of Global Studies' website at studyabroad.arcadia.edu

Student Conduct: The Resident Director or designee, in consultation with the Vice President of The College, is responsible for the enforcement of all policies pertaining to student conduct and discipline at the program site. The Resident Director may impose administrative sanctions such as warning, reprimand, censure, probation, suspension, dismissal, restitution and denial of privileges in the use of facilities whenever this becomes necessary to operate the program and properly protect the property of the University and/or the community. Sanctions may be appealed in writing to the Vice President. The decision of the Vice President on all matters is final.

Any incidents considered to be in violation of The College's Title IX policy will be reviewed and adjudicated in accordance with published rules and regulations. Adjudication panels in Title IX cases also reserve the right to impose sanctions and/or dismiss a student from a program.

Admissions: We reserve the right to withdraw a student from a program at any time if the student's academic or disciplinary record changes or if there is any material omission or misrepresentation on the application for admission.

Program Fee Payment and Refund Policies: Students must agree to abide by the financial policies outlined in the Fees and Financial Information studyabroad.arcadia.edu/fees/ section on The College's website. They must also agree to be responsible for all other expenses not covered by the program fee.

Property Damage and Unpaid Bills: Students are responsible for any and all damage to their room, residence or other program related property. The College will add any damage charges and unpaid bills to the student's account. Arcadia University will withhold the student's transcript until the account is paid in full.

Student Records Policies

Student Address and Biographical Data

Students are responsible for providing The College of Global Studies with accurate address and biographical information, which is solicited initially as part of the admission and registration process. Changes that occur while you are studying abroad in local address, permanent home address, the first person to notify in cases of emergency, marital status and name must be updated with The College. It is your responsibility to ensure that accurate, up-to-date address and biographical information is available to College officials at all times during your participation on a study abroad program.

The College verifies students' identities using their government-issued passport. Copies of passports provided to The College are stored securely in Arcadia University's student record system. College staff at in-country locations verify student identities during orientation programs.

Notification of Rights under FERPA

As described below, The College collects, uses, and discloses student education records in accordance with the Family Educational Rights and Privacy Act of 1974 ("FERPA") and its implementing regulations. This section discusses basic information about FERPA and should not be considered a definitive review of the law. More information about FERPA is available at:

www2.ed.gov/policy/gen/guid/fpco/ferpa/index.html.

FERPA affords eligible students certain rights with respect to their education records. (An "eligible student" under FERPA is a student who is 18 years of age or older or who attends a postsecondary institution at any age.) These rights include:

1. The right to inspect and review the student's education records within 45 days after the day The College receives a request for access. A student should submit to The College's Academic Dean a written request that identifies the record(s) the student wishes to inspect. The Academic Dean will make arrangements for access and notify the student of the time and place where the records may be inspected. If the records are not maintained by the Academic Dean, the Academic Dean shall advise the student of the correct school official to whom the request should be addressed.
2. The right to request the amendment of the student's education records that the student believes is inaccurate, misleading, or otherwise in violation of the student's privacy rights under FERPA.

A student who wishes to ask The College to amend a record should send a in a written document containing a date and original signature to The College's Academic Dean, clearly identify the part of the record the student wants changed, and specify why it should be changed.

The College may amend the educational record within a reasonable period of time and notify the student of the amendment.

If The College decides not to amend the record as requested, The College will notify the student in writing of the decision and the student's right to a hearing regarding the request for amendment. Students who are not satisfied with the outcome of any hearing have the right to place in their education records a statement commenting on the contents of the education record or on their

reason for disagreeing with the decision of the hearing panel. Additional information regarding the hearing procedures will be provided to the student when notified of the right to a hearing.

3. The right to provide written consent before The College discloses personally identifiable information (“PII”) from the student’s education records, except to the extent that FERPA authorizes disclosure without consent.

The College discloses education records without a student’s prior written consent under the FERPA exception for disclosure to school officials with legitimate educational interests. A school official is a person employed by Arcadia University in an administrative, supervisory, academic or research, or support staff position (including law enforcement unit personnel and health staff); a person or company with whom Arcadia University has contracted as its agent to provide a service instead of using Arcadia University employees or officials (such as an attorney, auditor or collection agent, OCICU, ESI International); a person serving on the board of trustees; or a student serving on an official committee, such as a disciplinary or grievance committee, or assisting another school official in performing tasks.

A school official has a legitimate educational interest if the official needs to review an education record in order to fulfill his or her professional responsibilities for The College.

Upon request, The College also may disclose education records without consent to officials of another school in which a student seeks or intends to enroll.

4. The right to file a complaint with the U.S. Department of Education concerning alleged failures by The College to comply with the requirements of FERPA. The name and address of the office that administers FERPA is:

Family Policy Compliance Office
U.S. Department of Education
400 Maryland Avenue, SW
Washington, DC 20202

Directory Information: FERPA requires that The College, with certain exceptions, obtain the written consent of a student prior to the disclosure of PII from that student’s education records. However, The College may disclose appropriately designated “directory information” without written consent, unless the student has advised The College to the contrary in accordance with The College’s procedures.

If a student does not want The College to disclose any or all of the types of information designated below as directory information, the student must notify The College in a written document containing a date and original signature by the start date of their program. The written request will remain in effect until the student directs The College, in a written document containing a date and original signature, that The College may designate the information as directory information.

The College has designated the following types of information as directory information:

- Student's name
- Graduation date
- Enrollment status (for current students)
- Dates of attendance
- Major field of study

Requesting a Release of Records: Students can request release of their individual records to select parties by requesting and completing a FERPA Request to Release Information form.

Withholding Transcripts: The College will issue transcripts of a student's permanent education record to students upon written request unless there are unpaid financial obligations to The College of Global Studies or other unresolved issues. The College is not obligated, however, to provide students with copies of transcripts or other source documents from other institutions unless state laws dictate otherwise.

Notice of Privacy Policy: For more information about how The College and Arcadia University collect, use, and disclose personal information provided by students to The College and Arcadia University, please refer to the Notice of Privacy Policy available at:

<https://www.arcadia.edu/notice-privacy-policy>.

Academic Policies

Academic Expectations

The College of Global Studies at Arcadia University is committed to academic excellence. All students who participate in our programs around the world are expected to exhibit dedication to their academic work and to act with academic integrity.

Academic Responsibility and Integrity

Students are required to comply with the principles of academic integrity and bear responsibility for their academic work while studying abroad. All submitted academic work, written or otherwise, must represent a student's original work and appropriately cite all quotations, concepts, and interpretations referenced in that work that are not the student's own, unique ideas. Any act of academic misconduct, such as fabrication, forgery, plagiarism, cheating, or facilitating academic dishonesty, will subject the student to disciplinary action.

Academic Contract

Students are required to sign an Academic Contract during their in-country orientation to confirm their understanding and acceptance of the academic expectations and policies outlined in the *Student Handbook*, as well as any additional, country-specific academic requirements.

Key academic deadlines are provided during the in-country orientation. Students are responsible for taking note of and complying with the deadlines related to their academic program. Any questions should be directed to the Resident Director or to the designee indicated during the in-country orientation.

Enrollment

1. Course Selection

The recording of program and/or host institution coursework on an Arcadia University transcript does not guarantee that students' home universities will accept those credits for application toward the credit requirements for graduation or specific degree requirements. Students are therefore responsible for seeking home institution pre-approval for all in-country courses they wish to pursue. The College or its designee will assist this process by providing, as available, any academic documentation required for course pre-approval by students' home universities. In isolated circumstances, specific provision of this information may take time. Students should therefore plan accordingly, as last-minute requests may be difficult to accommodate.

2. Registration deadlines

Whether taking courses taught by Arcadia faculty or at a host institution, students pursuing a semester of study have two weeks from the commencement of classes to make changes in course registrations (*i.e.* add/drop courses) without these changes being reflected on the Arcadia

University transcript. It is important to note that students studying at an Arcadia Center that combines program and university study may be subject to two different add/drop periods — one for their program courses and one for their host institution courses — if the program and host institution calendars do not align. On occasion, certain host institutions may employ a shorter add/drop period. In such cases, students must adhere to the host institution's requirements. However, if the add/drop period of the host institution or program is longer than The College's add/drop period, students must adhere to The College's add/drop policy.

Where host programs, host institutions, and/or visa enrollment requirements allow, The College permits students pursuing semester or academic year study who submit a formal written request to withdraw from a course in accordance with the policy delineated below, as long as they will not drop below The College's 12-14 credit minimum full-time load (excluding pre-session courses). In cases where the option of withdrawing during the term of study is not possible, students who submit a formal written request to withdraw from a course in accordance with the policy delineated below will be afforded the opportunity to petition for a retroactive withdrawal for a period of 30 days after the program end date.

Students may withdraw from a course after the two-week add/drop period, but before the 50% point of the term of study after consultation with the Resident Director or designee and written approval from the home institution. The grade for such courses will be recorded on the official transcript as a W (withdraw). Students may withdraw from a course after the 50% point but before the 75% point of the term of study only due to a documented academic and/or personal hardship that is outside of their control. Withdrawal at this point requires approval from the College's Academic Dean or designee and the home institution. The grade for such courses will be recorded on the official transcript as a WP (withdraw passing) or WF (withdraw failing) based on the assessments completed to date. Students cannot withdraw from a course during the last 25% of the semester except in rare instances of documented personal hardship that requires withdrawal from the entire program. Such withdrawals require approval from the Director of Student Life and Support Services or designee. In these instances, the courses will also be recorded on the official transcript as a WP or WF based on the assessments completed to date.

Students pursuing study for a term/quarter have the same two-week add/drop period as semester students (unless, as noted above, there is a shorter host institution add/drop period), while students pursuing January, Maymester, and summer programs may only add/drop courses prior to the start of the program. Term/quarter, January, Maymester, or summer students are

governed by the same mid-term and three-quarter-term deadlines for withdrawals. Courses dropped after the add/drop period without the appropriate approval(s) are, as noted above, reported as an 'F' on the Arcadia University transcript.

3. Reporting Host Institution Registration

Students pursuing study at a host institution or host program must submit a course confirmation report indicating the final course selections to the Resident Director or designee prior to the end of the host institution add/drop period.

4. Course Load

Semester and academic year students are expected to pursue a full-time course load. Students on term/quarter, January, Maymester, or summer programs will have lower full-time expectations due to the shorter period of study. Since a full-time course load varies from program to program, you should consult the credit-ranges posted on The College's website for your program. The expectations will also be reiterated during the in-country orientation.

Where program, host institution, and/or visa enrollment requirements allow, The College permits students pursuing semester or academic year study to enroll in a minimum full-time course load of 12-14 credits (excluding pre-session courses) with written approval from their home institution submitted to the Resident Director or designee prior to the end of the two-week add/drop period. It is important to note that certain programs of The College and some host institutions may not allow a minimum course load. Students must adhere to the requirements associated with their program or host institution.

Where program, host institution, and/or visa enrollment requirements allow, The College permits students pursuing semester or academic year study to enroll in a maximum full-time course load of 20 credits. You are responsible for any additional fees resulting from enrollment in excess of the standard load as well as ascertaining whether enrollment above 17 credits will incur additional fees at your home institution. A minimum full-time course load varies from 12–14 credits per semester (excluding pre-session courses) depending on the program.

5. Home Institution Financial Aid and Degree Progress Enrollment Requirements

The College's minimum course load requirements are designed to ensure that students maintain the minimum full-time course load associated with Federal Title IV financial aid requirements. These do not reflect the financial aid and/or degree progress requirements that might be

associated with students' home institutions. Students are therefore responsible for knowing and following the enrollment requirements associated with remaining a student in good standing at their home institution.

6. Home Institution Coursework

Students may pursue up to six credits of their coursework through special arrangement with their home institution. This coursework may involve home-institution-supervised independent study or independent research, or a home institution online course. It is important to note, however, that such coursework cannot be factored into students' in-country course load requirements; therefore, it can only be pursued in addition to the required minimum in-country course load for a given program. The approval process for such arrangements is the same as that required for pursuing a minimum full-time course load (*see* Enrollment: Course Load).

Grades, Attendance, and Examinations

1. Grades

The College only offers students the option to pursue coursework for an A–F grade. As a matter of course, The College does not offer students the option of pursuing courses on an Audit (AU), Pass/Fail (P/F) or Satisfactory/Non-Satisfactory (S/N) grade base. If, however, a host institution reports a course on a P/F grade scale, The College will also report it as such, and The College will report grades on an S/N scale in instances involving disruption of host institution coursework.

A grade of Not Reported (NR) for the purpose of finishing coursework post-program will only be granted at The College's discretion in the case of a hardship withdrawal or a case of documented hardship that doesn't require withdrawal from the program but involves an extended absence. In these instances, the coursework must be completed within 30 days of the final day of the program as stated in the program materials.

Grade appeals may be pursued in one of two ways, depending on the host of the course(s) to be appealed. Courses pursued through an Arcadia Center are appealed through The College's Registrar. Students will be asked to provide a rationale for their appeal, which will then be researched by The College's Academic & Student Affairs staff in collaboration with appropriate in-country staff of The College. The College's Petition Committee (Academic Dean, Director of Student Life & Support Services, and The College's Registrar) will then render a decision.

Appeals regarding host institution courses are pursued through the host institution's process. The College cannot undertake appeals on a student's behalf and has no influence over the outcome of appeals regarding a host institution course; the host institution is the final arbiter of all such appeals. The College's role is limited to instructing students on the appeals process, following up with the host institution international offices when required, and, if a grade or enrollment status is changed, producing an updated Arcadia University transcript.

Students wishing to pursue an appeal should notify Arcadia University's Registrar via email (tcgsregistrar@arcadia.edu). Students are responsible for following the instructions provided for the appeal, which will involve directly contacting, as appropriate, the host institution international office, academic affairs unit, and/or instructor of the course. Students should copy The College's Registrar on all correspondence related to the appeal.

2. Attendance

You are expected to attend and contribute to each course for which you are registered, as well as to complete course assignments in a timely manner and to sit scheduled examinations. It is your responsibility to be aware of assessment requirements, deadlines, and participation and attendance policies.

Absences are disruptive to The College's teaching and learning environment, especially absences from a course meeting involving an excursion. If an illness or a personal crisis requires you to miss a College of Global Studies taught course, it is your responsibility to alert your instructor and/or Arcadia Center staff as soon as possible, preferably prior to the start of class. Know that excessive absences will likely affect your grade.

Host institution courses will have their own requirements regarding assessments, deadlines, and participation and attendance; it is your responsibility to be aware of and abide by those requirements, in addition to the requirements of The College.

The College of Global Studies recognizes student choice in observing religious holidays that occur during regularly scheduled classes. Students should make arrangements in advance of their absence with their instructors to establish a plan for making up work missed as a result of a religious observance. Instructors make every reasonable effort to accommodate such requests.

3. Assignments and Examinations

Based on The College's expectation of academic dedication, responsibility, and integrity, students are expected to complete all assignments, examinations, and final papers for each course for which they are registered.

Students pursuing study at a host institution should be aware that choosing to participate in an alternative final assessment (*i.e.*, one designed specifically for study abroad students) may also involve effectively removing oneself from the institutional academic oversight processes. Possible implications include being unable to contest a grade or to request, when otherwise appropriate for the standard assessment, a re-sit examination (see below).

Students pursuing study at a host institution in the United Kingdom or the Republic of Ireland may have the option of pursuing a "re-sit" of that examination/assessment. Re-sits are designed to give students the opportunity to re-take an examination/assessment in order to demonstrate that, with additional time, they have mastered the material. The parameters for pursuing a re-sit, including at what performance level a re-sit is available, whether it is an option for a given course, whether the resulting grade from a re-sit is capped, etc. are exclusively within the purview of the host institution.

Students interested in pursuing a re-sit should contact The College's Registrar. The Registrar will put the student in contact with the in-country staff member responsible for liaising with the host institution. The in-country staff member will notify the institution of the forthcoming appeal, learn what the process is for appealing a grade, and then contact the student to explain the process. The host institution's process is the final arbiter of such requests including whether or not the examination/assessment may be pursued at the student's home institution with proctoring or must be pursued on the host institution campus.

Course Equivalencies and Transcripts

Arcadia Center Courses

All courses taught at Arcadia Centers abroad are reviewed and approved by The College of Global Studies Curriculum Committee and the Arcadia University Senate Academics Committee according to the Arcadia University Academic Policies and Procedures for course proposals and approval. Approved

courses are then continuously assessed through processes associated with The College's course evaluations and Assessment of Teaching, Learning and Scholarship ([ATLAS](#)) review process.

Host Institution Courses

All host institutions at which students study under the auspices of The College of Global Studies are nationally authorized, degree-granting, post-secondary institutions that are responsible to the Ministry of Education and/or peer review quality control processes in their own countries. The College continuously monitors these programs through the liaising processes of the Resident Directors and The College's ATLAS review process.

Host Program Courses

Arcadia University serves as the "school of record" for all coursework pursued at non-host-country-accredited programs under the auspices of The College of Global Studies. As is the case with the Arcadia Centers, all courses taught at these programs are reviewed and approved by The College of Global Studies Curriculum Committee and the Arcadia University Senate Academics Committee according to the Arcadia University Academic Policies and Procedures for course proposals and approval. Approved courses are then continuously assessed through processes associated with The College's course evaluations and ATLAS review process.

Transcripts

Arcadia University is the sole transcribing authority for all Arcadia Center and school of record courses pursued at non-host-country-accredited programs. In addition to being accredited by the Commission on Higher Education of the Middle States Association of Colleges and Schools, Arcadia University's undergraduate and graduate programs are accredited and approved by numerous academic and professional bodies, associations and councils. These organizations are listed at: www.arcadia.edu/academics/accreditation/.

All students studying through The College receive a transcript from Arcadia University as part of the student's permanent education record at Arcadia University.

In the case of host institution enrollment under the auspices of The College, the host institution issues to The College transcripts reporting students' coursework and grades. The College's Registrar, in collaboration with the Academic Dean, is responsible for establishing U.S. credit and grade equivalencies for each host institution. In the case of host institution enrollment, The College provides

the student's home institution a verified copy of the host institution transcript upon homeschool request in addition to the Arcadia University transcript.

Transcripts from host institutions are kept on file at Arcadia University for five years. Requests for this documentation must indicate the specific students for whom academic records are required, come directly from an official at the institution that requires copies of the transcripts, and should be addressed to: The College of Global Studies, Arcadia University, 450 South Easton Road, Glenside, PA 19038-3295.

Transcript issuance

At the conclusion of a program, The College of Global Studies is required to send an official Arcadia University transcript to the student's home institution. The transcript will list the course numbers and titles exactly as they appear on the host institution transcript or in the Arcadia Center or host program materials. Students may request an additional copy of their official transcript by mail to the Office of the Registrar, Arcadia University, 450 South Easton Road, Glenside, PA 19038-3295, or online, TranscriptsPlus™ at: www.arcadia.edu/academics/registrar/transcript-requests.

Due to different administrative structures and processes, host institution transcripts take longer to issue than transcripts at U.S. institutions. While the timeline varies by institution, a general transcript issuance timeline is:

- Summer Programs – transcript issued early to mid-September
- Fall Programs – transcript issued late-March
- Academic Year Programs – transcript issued late-September
- Spring Programs – transcript issued late-September

In cases where extenuating circumstances prevent an individual instructor from reporting a grade in a timely manner but all other grades have been received by The College, or if a student requires a transcript for proof of attendance but the host institution's or program's transcript has not yet been received by The College, The College's Registrar will report courses with a grade of Not Reported (NR). The Registrar will then issue an updated transcript once the missing grade(s) have been reported.

Transcripts will be withheld by The College's Registrar if students have an outstanding balance on their account resulting from nonpayment of: the program fee (in whole or in part), special course fees, late

fees or returned check fees, housing damage charges, library fines, or any other unmet financial obligations deemed appropriate by The College.

Students may contact the program manager responsible for their program if they have any questions about the process. Graduating seniors who require a transcript by a certain date in order to meet graduation requirements should contact their program manager and request an expedited transcript. The College's Registrar will make every effort to meet this deadline; however, it is not possible to guarantee that the deadline will be met because the host institution processes are ultimately outside the control of The College's Registrar.

Code of Academic Responsibility and Integrity

The life of any community depends on the integrity and personal honesty of its members. An academic community must pay special attention to the values that define the nature of its academic life. These have historically included the right to freedom of inquiry, a commitment to truth, and respect for the freedom of inquiry of others.

A distinguishing characteristic of an academic community is the way that it combines competitive and cooperative values. On the one hand, education is a shared task and progress comes through cooperative efforts. On the other hand, new ideas are the currency of the community, and it is therefore important to acknowledge the individual ownership of ideas.

It is a serious violation of the norms of the academic community to appropriate the ideas of other people without credit or permission, and it is important to learn to discriminate between exploitation and the legitimate use of the ideas of others.

The most general rule is that any use of another person's ideas—whether the source is published or not—should be acknowledged fully and in detail. Because each discipline differs in the best way to acknowledge another person's ideas, students should consult instructors as to the form and nature of the acknowledgments required for the work associated with a given course.

Arcadia Center Courses: Procedures for Examinations, Written Work, and Laboratory Work

Procedures for Taking Examinations, Tests and Quizzes:

1. To eliminate suspicious behavior during any type of examination, students must leave all books, notes, note cards, papers, materials and instruments in a designated location away from the testing area, except for those materials previously specified by the instructor.

2. The instructor may remain in the exam room. If the instructor leaves the room after the initial questions are asked, he/she will remain accessible and may return to answer questions that arise during the examination.
3. Students must direct any requests for clarification of questions only to the instructor.
4. Silence is to be maintained in the exam room.
5. Students should, if possible, occupy every other seat.
6. Students are not to leave the test area unless an emergency arises, or by permission of the instructor. The instructor's policies on leaving the testing area should be specified beforehand. If students do leave the room, they must leave their test papers behind.
7. In fairness to all students, you must finish the examination by the end of the examination period. The examination time can be lengthened only if granted at the beginning of the period, and only if the extension applies to all students. (Students with advance special permission are exempt.)

Procedures for Papers, Reports, and Other Written Work:

1. When preparing all written work, take great care to fully acknowledge the source or sources of all ideas, language, diagrams, charts, or images (including but not limited to drawings, designs or photographs) etc., which are not your own. If you intentionally appropriate the ideas, images or language of another person and present them without attribution, you are committing plagiarism. This includes the purchase or acquisition of papers or other material from any source. For specific questions consult with the instructor, but the following rules must be observed:
 - a. Any sequence of words appearing in your essay which is not your own must be enclosed in quotation marks and the source identified in a manner designated by the instructor.
 - b. A paraphrase should not be enclosed in quotation marks, but should be footnoted and the source given.
 - c. An interpretation based on an identifiable source must be so attributed.
2. If you wish to seek assistance from another student (i.e., proofreading for typographical errors), consult your instructor to determine if such assistance is permissible. If permitted, the instructor may require that such assistance be acknowledged in the written work.

Procedures for Laboratory Work:

Unless otherwise directed, you are expected to make all necessary measurements, drawings and calculations independently, based on your own work. Observations, including numerical data for working out results, are to be collected and used independently.

Host Institution and Host Program Courses: Procedures for Examinations, Written Work, and Laboratory Work

In addition to the procedures noted above, students must also adhere to the host institution and host program procedures for examinations, written work, and laboratory work. If those procedures are in conflict, the host institution and host program procedures take precedence.

Violations of the Code of Academic Responsibility and Integrity

Each of the following constitutes a violation of the Code of Academic Responsibility and Integrity:

1. Plagiarism – If you appropriate the ideas, concepts, images (including but not limited to drawings, designs, or photographs) or language of another person and present them without attribution, you have committed plagiarism. Great care should be taken in academic work to acknowledge fully the source or sources of all ideas, language, diagrams, charts, etc. For specific questions the instructor should be consulted, but the following rules must be observed:
 - a. Any sequence of words that is taken verbatim from another source must be enclosed in quotation marks and the source identified in the manner designated by the instructor.
 - b. Paraphrases and interpretations from a source should have the source identified.
 - c. Unless otherwise directed, when you are doing laboratory work, you are expected to make all necessary measurements, drawings and calculations independently, based on your own work. Observations, including numerical data, are to be collected independently.
 - d. If instructors permit you to seek the assistance of other students on academic work, the exact nature of the assistance must be acknowledged in detail. This refers not just to papers, but also to laboratory work and computer programs.
 - e. Any use of a commercial writing service is forbidden.
2. Submitting the same work for credit in more than one course without the express permission of each instructor involved.

3. Attempting to give or to receive unauthorized assistance on academic work, as well as attempting to hinder others in their academic work.
4. Furnishing false information to University officials on matters relating to academic work. This includes, but is not limited to:
 - a. false information provided for the purpose of obtaining special consideration (*e.g.*, postponement of examinations or of deadlines for written work);
 - b. fraudulent registration for classes;
 - c. signing the name of an absent person to an attendance sheet; and/or
 - d. reporting the results of experiments or surveys not performed.
5. Attempting to gain unauthorized access to exams or tests.
6. Cheating during examinations, which includes:
 - a. attempting to look at another student's exam;
 - b. attempting to communicate concerning the content of the exam with another student; and/or
 - c. attempting to use any materials (such as notebooks, notes, textbooks) not specifically authorized by the instructor.
7. Failing to follow any of the procedures outlined above in regard to taking examinations, tests and quizzes.
8. Failing to sign a book or periodical out of the library or from other consortium libraries.

For host institution and host program courses, additional violations may be included as a part of the host institution or program's Code of Academic Responsibility and Integrity or equivalent policy.

Procedures for Reporting Violations of the Code of Academic Responsibility and Integrity

1. If you have violated an academic regulation, you may report yourself to the instructor involved or the Academic/Resident Director or designee.
2. If you suspect that a violation has occurred, you may submit to the instructor of the course a written, dated, and signed report of the suspected violation. Persons with knowledge of the violation may be questioned or asked to give testimony by the instructor or the Academic/Resident Director during the investigation and, as necessary, adjudication of the infraction.

3. In the case of Arcadia Center courses, every effort will be made to resolve charges against students before the end of the program. However, the timeline for the resolution of charges will vary for host institutions and host programs.

Procedures for Determining the Level of Responsibility for Violations and Sanctions

After a violation of the Code of Academic Responsibility and Integrity has been alleged, there are two possible procedures that may be followed in resolving the alleged violation:

1. The student who is accused of the violation and the instructor may mutually agree to have the instructor decide the case and assess the penalties as s/he determines fit. Violations that are addressed in this manner must be resolved by the end of the program.
 - a. An instructor who suspects a student of violating academic regulations will notify the student of the allegation and the grounds for suspicion promptly after it is discovered or reported.
 - b. If the instructor finds the student responsible for the infraction, the instructor must submit a written report to the Resident Director or designee, describing the violation, the grounds for suspicion, the decision, and the penalties applied. The Resident Director or designee will notify the student of the instructor's report. The College will keep a record of the report in the student's file at The College for a period of five years.
 - c. If the Resident Director or designee discovers upon receipt of this report that the student has previous violations, the Resident Director shall promptly consult the Academic Dean of The College or designee for the purposes of determining if additional, administrative-level sanctions are appropriate.
 - d. If new evidence becomes available or extraordinary circumstances are revealed within a reasonable period of time after a decision is rendered, a student may request reconsideration of the case. A student may make such a request in a letter addressed to the Resident Director or designee, who will then consult with the Academic Dean of The College or designee to decide whether to revise the previous decision and sanctions. The decision of the Academic Dean or designee is final in such matters.
2. The student who is accused of the violation or the instructor involved may choose to refer the case directly to the Resident Director or designee.
 - a. Within one week of discovery of the alleged violation, the party choosing this procedure must present a written, dated, and signed statement of the reasons for requesting a hearing to the Resident Director or designee.

- b. The Resident/ The College reserves the right to notify a student's home school and/or parents/guardians of both the offense and the disciplinary action taken. Actions taken are recorded in the student's file. Director or designee, in consultation with the Academic Dean or designee, will review the case.
- c. The instructor involved must await the results of The College's full review before assessing any sanctions.
- d. If the student is found responsible for the infraction, the Resident Director or designee will send a written report to the student and to the instructor describing the violation and the recommended sanction(s). The College will keep a record of the report in the student's file at The College for a period of five years.
- e. In every case concerning academic integrity, the instructor has final authority for determining the sanctions to be applied within the course. In cases where the instructor chooses to defer to the Resident Director or designee for the adjudication process, the Resident Director or designee may only implement administrative sanctions. Sanctions involving course grades are only advisory, with the final decision regarding implementation left to the discretion of the instructor.
- f. If, within a reasonable period of time after a decision is rendered, new evidence becomes available or extraordinary circumstances are revealed, a student may request reconsideration of the case. A student must make such a request in a letter addressed to the Academic Dean of The College, who will then decide whether to revise the previous decision and sanctions. The decision of the Academic Dean or designee is final in such matters.

Sanctions

In cases where adjudication of the violations of the Code of Academic Responsibility and Integrity are referred to the Resident Director or designee, sanctions include but are not limited to:

- 1. a formal written warning;
- 2. requiring resubmission of work or additional assignments;
- 3. lowering the letter grade for the work involved;
- 4. issuing a grade of F for the work;
- 5. lowering the letter grade for the course;
- 6. issuing a grade of F for the course; and/or
- 7. dismissal from program.

Program Participation and Withdrawal

A student who stops participating in a program without formally withdrawing prior to the end of the term of study will receive a grade of F (failure) on the official transcript. A student who wishes to formally withdraw must notify the Resident Director or designee in writing.

A student who formally withdraws from a program prior to the end of the term of study will receive a grade based on the criteria established in Enrollment: Registration Deadlines. Students who withdraw under the condition of extenuating circumstances beyond their control may petition to have the grade of “WF” or “WP” changed to “W.” Such petitions are submitted to the Director of Student Life.

Housing Policy

The College believes housing is a critical and foundational element of the learning experience, and plays a key role in students becoming part of the host community. Arcadia recognizes that feeling 'at home' is the first step to success on any program. As such, we take into account the following aspects of all student housing: safety, location, cost-effectiveness, and cleanliness. We encourage students to take full advantage of the learning opportunity of living in a new and diverse environment. In many cases, students have the choice of living alongside local residents, in homestays or with other program participants from a wide range of institutions and backgrounds.

We recognize that students may elect to make their own living arrangements while abroad. Students assume any and all risks arising from their choice to live independently, including and without limitation, the risks of bodily injury or property damage, unavailability of, or access to, quality of emergency medical care, and the deliberate act(s) of another person. Students living independently will be responsible for travel arrangements to their accommodations and all associated costs. Certain programs require students to live in Arcadia University-arranged housing; therefore, in such a case, requests to live independently are not considered.

As The College considers housing as an important element of any students' study abroad experience, arrangements are often made well in advance of the start of each program. Students should be certain to review the information and deadlines around housing choices in the Financial Information Section on The College of Global Studies' website at: studyabroad.arcadia.edu/fees.

Loss or Damage Statement

The College of Global Studies at Arcadia University is not responsible for the loss of students' property due to fire, theft, water damage, or any other causes. It is suggested that students obtain insurance against loss by fire, theft or any other causes before attending the program, and/or before moving into living accommodations overseas.

Health and Safety

Student health, safety and security are our top priorities. The College of Global Studies has an experienced and well-connected Health and Safety team based in Glenside that works closely with our expert Resident Directors and overseas staff to ensure best practices in health, safety, and security on all of our programs. Our staff members are prepared to support students through pre-departure and while on-site and are available to respond to emergencies that may arise through 24-hour staffed telephone numbers.

We are committed to:

- Promoting student wellness and fostering diversity and inclusion
- Supporting students with pre-existing conditions or disabilities
- Education regarding health, safety, and local conditions
- Ongoing risk assessment
- Safe and secure housing
- Timely incident response and communication

Clear and effective emergency plans and procedures Our policies and procedures receive ongoing review and refinement from our Executive Director and senior leadership team; our U.S.-based Health, Safety, and Security Director; and our experienced and well-trained in-country staff. Read more about the [best practices and professional networks](#) that inform our approach to health and safety.

We encourage all program participants and parents/guardians to thoroughly [review our website](#) to learn more about our protocols and what steps to take to prepare for the students' experience, as each

individual's own preparedness is key to ensuring their personal health and security. Our staff is dedicated to partnering with students towards a positive and productive experience abroad.

Study abroad is a profoundly life-changing experience. Concerns about health, safety and security should not dissuade you from this wonderful opportunity. Instead, we encourage you to be informed and knowledgeable about the risks and rewards of such an undertaking.

Health Insurance and Travel Assistance

Overview

All program participants have access to 24/7 global medical and security assistance while abroad from International SOS, the world's leading medical and security risk services company. The College also provides students with comprehensive health and accident insurance through Cigna Global and security and supplemental travel benefits through Lloyd's. This coverage is administered by University Health Plans and designed to go hand and hand with the International SOS membership.

Students attending programs in New Zealand will be provided with the New Zealand government's mandated insurance plan as primary coverage and have access to the Cigna policy as secondary coverage. Please review the [New Zealand Health and Safety page](#) for more information and contact a New Zealand Program Manager with any questions.

Health insurance and travel assistance are effective throughout the duration of the participant's program. There is no deductible per injury or illness, and the maximum medical expenses of the policy for accident or sickness is \$500,000.

After acceptance into the program, students will receive more detailed information about coverage as well as their membership number. Students can then utilize the assistance services to discuss medical and security concerns relating to their destination.

Additional information about health insurance and travel assistance is available online at: <https://studyabroad.arcadia.edu/before-after-you-go/health-safety/health-insurance-travel-assistance/>.

Travel/Personal Property Insurance

We strongly encourage students to obtain insurance against theft and/or damage to personal effects for the period of time they will be abroad. Arcadia University does NOT provide insurance for student

possessions or property. (Note: students participating in programs in New Zealand will have some property coverage through the insurance mandated by the New Zealand government).

Please contact the Director of Health, Safety, and Security, with any questions about insurance coverage, at 1-866-927-2234.

Personal Health and Student Support Services

The College encourages students with pre-existing conditions and disabilities to consider study abroad. We are committed to working with each student in an effort to find a program that suits his or her individual needs. We strongly recommend that students contact their Program Manager to discuss the kinds of support available to help students achieve their cultural, educational, and personal goals abroad.

The College works with its overseas offices and partner universities to provide reasonable accommodations to students with disabilities. Not all program sites are equally able to accommodate all types of disabilities due to local in-country contexts over which the College has no control, nor are all our locations able to provide appropriate support for all disabilities.

However, among our programs there is a wide-range of opportunities and we will work with students, to the extent possible given the reasonable accommodations available, to match them with suitable alternatives that meet their needs and study abroad goals.

Personal Health Preparations

It is important to be healthy, both physically and mentally, before going abroad, as the challenges that come with transitioning to a new environment and culture can affect both physical and mental health. All students are recommended to schedule a checkup with their doctor(s) and/or care provider(s) before departure to discuss how to stay healthy and establish a plan for what to do if any current conditions are exacerbated or previous conditions resurface while you are abroad.

If you are taking prescription medication, you should make arrangements to bring enough medication to last for your stay abroad, if permitted. Refer to our website for complete guidelines on [bringing medications abroad](#).

Immunizations

The College of Global Studies strongly supports the use of vaccines to protect the health of individual students and the study abroad community and discourages the use of nonmedical exemptions to required vaccines. Students studying abroad with The College will be prompted to complete a form during the enrollment process to verify that the following required immunizations have been obtained:

- **Hepatitis B:** Three doses of Hepatitis B vaccine are needed for immunity. Doses 1 and 2 must be administered at least four weeks apart. Dose 3 should be at least six months after the first dose and eight weeks after the second dose. A blood test may be used to confirm immunity.
- **Measles, Mumps, Rubella:** MMR #1 and #2: Two doses of Measles (Rubella); two doses of Mumps and one dose of Rubella; or two doses of the MMR vaccine; or results from a blood test showing immunity. Dose I must have been given on or after the student's first birthday. Dose 2 must have been given at least four weeks after dose I.
- **Meningococcal:** Meningococcal conjugate vaccine (MCV4): initial dose administered at age 11-12 with booster dose administered at age 16 or older.
- **Varicella (Chicken Pox):** Two doses of varicella (chicken pox) vaccine are needed for immunity. The doses must be administered at least 28 days apart; or a blood test confirming immunity if a student has had the chickenpox disease.
- **Tetanus-Diphtheria-Pertussis (Tdap)** (Within 10 years): One dose of Tdap (tetanus toxoid, reduced diphtheria toxoid and acellular pertussis, (NOT to be confused with DTap or Td)) vaccine is needed for immunity. The Tdap vaccine booster is also needed if it is less than 10 years since the Tdap was administered.
- **Polio:** Four dose series given during childhood at each of the following ages:
 - 2 months
 - 4 months
 - 6 through 18 months
 - (booster) 4 through 6 years
- **Tuberculosis screening** (within the last six months)

Recommended vaccinations include Hepatitis A Vaccine (HepA), Human Papillomavirus (HPV), and Pneumococcal Vaccine.

A physician must complete the certification section of the verification form as proof of vaccination. Notwithstanding the above-required vaccinations, if a student has a sincerely held religious, medical, or philosophical objection to being vaccinated, that student shall be exempted from the College's

immunization requirements and provided with detailed information on the risks associated with meningococcal disease and the availability and effectiveness of any vaccine. They must read, sign, and submit the University Immunization Waiver Form accompanied by appropriate supporting documentation, as required. Failure to receive the recommended vaccinations set forth above may increase the risk of such student contracting a preventable infectious disease.

In the interests of the safety of our abroad community, if there is a vaccine-preventable disease outbreak at a study abroad location, non-immunized students may be excluded from the abroad campus, classes, accommodations, and other activities at The College for the duration of the outbreak, which can last up to 21 days after the last case is detected at the abroad campus. Any affected students will be responsible for any costs associated with their exclusion from the program under these circumstances as well as any academic repercussions that might arise as a result of their absence.

If a student fails to submit a completed Undergraduate Student Health Record or signed University Immunization Waiver Form within the required time frame, Student Health Service's online medical system will place a hold on the student's registration until all requirements are met. In the case of College housing, a student will not be permitted to move into, or will be removed from, housing unless vaccination against meningococcal disease has been proven or the University Immunization Waiver Form submitted.

Any questions regarding immunizations or The College's immunization policy should be referred to the Director of Health, Safety, and Security, at 1-866-927-2234. Additional Resources for vaccine information can be found at [Centers for Disease Control \(CDC\)](#) and [American College Health Association \(ACHA\)](#).

Additional vaccinations may be required or recommended to enter certain countries. Please check with your local county health department and/or your family physician for required and recommended vaccinations to enter countries where you may be studying. Additional information regarding vaccinations needed and recommended for traveling to certain destinations can be found at [CDC Traveler's Health Studying Abroad Page](#).

Process for Disclosing Specific Needs

As part of the pre-departure process, all students complete a Personal Health and Self Care Form. On this form, students are asked to list any medical or mental health condition(s); physical or mobility

conditions; dietary restrictions or preferences; learning accommodations; allergies; and/or strict religious observances.

We encourage all students to disclose any condition(s), previous or current, that is part of your life or may require support while abroad, as well as any conditions or disabilities that require accommodations. Physical or psychological conditions can become more serious under the stresses of a new environment abroad. Moreover, the healthcare systems and accommodation requirements in other countries are different from the systems in place in the United States. Students are responsible for their well-being and the responses you provide will help us to properly advise you of the resources available in order to optimize your health and safety while abroad.

Disclosing this information will not affect your participation unless it is of such a serious nature that it may impact your ability to be successful on the program, as solely determined by College staff. In such cases, we will discuss with you any available options.

If you require accommodations while abroad, you will need to submit official supporting documentation to receive consideration for accommodations. Because we want students to enjoy a successful and rewarding study abroad experience, we encourage students to disclose all specific needs as early in the application process as possible, and at least six weeks prior to the beginning of the program. Failure to disclose any conditions or to provide proper documentation far enough in advance of departure may limit the resources and support available to you while abroad.

All information you provide is considered confidential and will only be shared on a need-to-know basis in emergencies or where necessary for your treatment. We encourage students with a medical condition that might affect emergency treatment to wear a MedicAlert bracelet or pendant.

Travel Safety and Security

The College of Global Studies at Arcadia University takes all reasonable steps to promote student safety and security on our programs. Our Centers maintain robust emergency plans that are reviewed and practiced regularly. Additionally, we conduct ongoing risk assessments to ensure our policies and protocols are relevant and revised when necessary.

Emergency Procedures

In the event of a large-scale emergency, The College will reach out to students who may be affected to confirm their safety and offer assistance. To aid in those efforts, all students are expected to have a mobile phone from which they can make and receive phone calls or texts without a Wi-Fi connection. Students are asked to provide the phone number to College staff on arrival. Additionally, we ask students to share any independent travel plans with The College through an online travel form which they will receive via email weekly, in order to be located and contacted in emergency situations.

Emergency Contact

All students are provided with a 24-hour contact for College staff while in their respective study abroad countries. In the event of an emergency, students on-site should contact an emergency responder or the on-site staff immediately.

If students are unable to contact an emergency responder or the on-site staff immediately, they should contact the College's Glenside office in the United States. During standard business hours, Monday through Friday 9:00 am-5:00 pm Eastern Time, students can reach our Glenside office by calling our toll free number, (866) 927-2234. For non-business hours, students can reach us by calling Public Safety at (215) 572-2999. Public Safety will take the student's contact information and relay it to a member of The College of Global Studies' senior staff who will reply to the student's call promptly.

Information about our emergency contact procedures is available at:

studyabroad.arcadia.edu/contact-us/in-case-of-emergency/

Student Preparedness and Resources

The College encourages all students to become informed travelers before they depart for their program and while abroad. Read the safety information provided by Arcadia, keep up with country-specific news, and research health, safety, and security matters for your destination(s). Recommended resources include:

- The U.S. Department of State (DOS) [Travel website](#), which details country-specific information about health and safety in every country as well as Travel Advisory levels to help travelers understand and mitigate risk in their destination.
- [International SOS](#), Arcadia's medical and security assistance provider. International SOS' website provides detailed medical and security information and advice for countries worldwide. Students can sign up to receive email alerts from International SOS for their destination(s).

- The U.S. Department of State's [Smart Traveler Enrollment Program](#) (STEP). STEP is a free service that allows U.S. citizens to receive security messages and other important information from the Embassy or Consulate in their destination. The College enrolls all students in STEP for their program location but encourages students to register independent travel to other countries in STEP.

Code of Conduct

The College regards all students as responsible citizens who have the same obligations as other citizens to observe the laws of the United States and the local and national laws of the host country. The College does not regard itself or its members as above the law in any way. Students are subject to the rules and regulations of the host institution or program, as well as governed by the rules and regulations of The College and those of their home and host institutions. Therefore, students should familiarize themselves with the Codes of Conduct for their home and host institutions and remain mindful that they may be separately held accountable for violations of those codes by their home and host institutions.

To the extent there are any differences in Codes of Conduct of The College and those of the home and host institution, The College will enforce its own Code of Conduct. In other words, in the event of any conflicts between the separate policies, those laid out in this *Handbook* will control.

As a member of an academic community, students have both rights and responsibilities to benefit from a collegiate environment that encourages the maximum development of all students.

Students are reminded that existing regulations and policies contained in this *Handbook*, including in the Code of Conduct, are binding and that all students are responsible for knowing and complying with this Code of Conduct. Violations of this Code of Conduct can lead to dismissal from the program, loss of academic credit, and, in addition, may result in a decision by The College to impose further sanctions.

Violations of the Code of Conduct

Students' wellbeing requires the prevention of behavior that interferes with or threatens the welfare of others or the community. To list all the acts that might constitute unacceptable conduct is impossible. However, your participation in any of the actions listed below constitutes a violation of The College's regulations and subjects you to disciplinary action:

1. Physical abuse, verbal abuse, threats, intimidation, harassment, coercion, and/or conduct which threatens or endangers the health or safety of any person on Arcadia or host university premises or at Arcadia or host university-sponsored events or activities.
2. Violation of the Non-Discrimination Policy of Arcadia University and The College of Global Studies, including, but not limited to, discrimination on the basis of race, color, ancestry, national origin, gender, sexual or affectional orientation, religion, age, or disability.
3. Any act of sexual harassment, sexual violence, sexual assault, intimate partner violence, domestic violence, dating violence, or stalking against The College's community members of any gender. (*See Policy Prohibiting Sexual Misconduct, Relationship Violence, and Stalking*)
4. Hazing, aggravated hazing, and organization hazing against The College's community members (*see Anti-Hazing Policy*)
5. Violation of local, state, and federal laws, or local and national laws in the case of programs administered outside the United States.
6. Openly abusing the customs and mores of the host community.
7. Reckless and/or malicious destruction, damage or misuse of Arcadia or host university property, or of the property of a member of the Arcadia or the host institution or program community, or any attempt to cause such damage.
8. Possession of stolen property, theft, attempted theft of Arcadia or host university property, or theft of the property of a member of this or the host institutional community. This includes removal of any Arcadia or host university property from its designated area.
9. Unauthorized entry into or use of facilities or property of another person, of Arcadia or of a host university, as well as the illegal possession, duplication, or unauthorized use of keys to Arcadia or host university facilities.
10. Conduct that is disorderly, lewd or indecent; that constitutes a breach of peace; or that causes inconvenience, annoyance or alarm. Disorderly conduct includes, but is not limited to, any unauthorized use of electronic or other devices to make an audio or video record of any person while on Arcadia's premises without his/her prior knowledge, or without his/her effective consent when such a recording is likely to cause injury or distress.
11. Interfering with any College disciplinary process, including but not limited to, tampering with evidence, falsifying or withholding information, or inducing a witness to engage in such conduct.
12. Gambling as prohibited by law.
13. Obstruction or disruption of teaching, research, administration, or other lawful Arcadia University or host university activities, or of any authorized activities on Arcadia University or host university premises.

14. Setting fires, tampering with or misusing fire equipment, or setting off false alarms in any facility made available by Arcadia University or host institution.
15. The sale, possession, production, purchase or use of any explosives, fireworks, incendiary devices, firearms or weapons.
16. Any violation defined below as an Alcohol and Drug Violation (*see* Alcohol and Other Drugs Policy).
17. Smoking in any Arcadia University building or host country/university grounds where it is prohibited.
18. Failure to comply with directions of College or host institution or program officials acting in performance of their duties.
19. Violation of published College or host institution or program regulations and policies, including those relating to entry into and use of facilities, the rules of the Code of Academic Responsibility, and any other regulations that may be enacted.
20. Fraud, intentional misrepresentation, forgery, or falsifying University documents, records, or identification cards; or knowingly furnishing false information to Arcadia University or the host university or to any university officials acting in performance of their duties.
21. Misuse of computer technology or resources (*see* Computer Abuse Policy).
22. Failure to engage in responsible social conduct that reflects well upon The College of Global Studies community and to model good citizenship in any community.

General Procedures for Investigation, Discipline, Sanctions and Appeal

Application of the General Procedures set forth in this *Handbook* may vary depending on the length of the study abroad program. The College will make reasonable efforts to complete the investigation and adjudication of any alleged violations of the Code of Conduct, or other policy or regulation, within a reasonable timeframe and under the time constraints of each individual program. However, students should bear in mind that the General Procedures for Investigation, Discipline, Sanctions and Appeal may be adjusted to accommodate the shorter duration of certain study abroad programs. This may mean that for certain alleged violations, the investigation and adjudication process may take place, or partially take place, after a student has returned to their home institution.

The Resident Director is responsible for investigation and adjudicating alleged violations of College regulations and policies. If the Resident Director is involved in the alleged violations, the Vice President of The College of Global Studies at Arcadia University will designate the person responsible for

adjudicating the case.

Procedural Standards: In the event that the Resident Director or a member of staff receives a complaint of an alleged violation of the Code of Conduct, or other policy or regulation, or determines for him/herself that such an alleged violation has occurred, the Resident Director shall ensure that the following requirements are met before rendering a final determination: (1) the student will receive notice of the alleged violation prior to any disciplinary action being taken; and (2) the student shall have the opportunity to respond, explain, and defend against the alleged violation prior to any action.

Standard of Review: The Resident Director or designee will evaluate the points of view of the accused student and any other party to the matter and will determine if it is more likely than not that the accused student engaged in behavior that is in violation of policy. During the course of this process, the technical rules of evidence applicable to civil and criminal U.S. cases shall not apply.

Notice to the Student: All students will be notified of any allegation of a violation of the Code of Conduct, or any other policy or regulation. The type of notification may vary depending on the seriousness of the accusation and the type and length of the program. If the alleged violation results in an interview, the student will be informed at the interview of the nature of the allegation, the regulations or policy allegedly violated, their right to respond, and the procedures to be followed. If the alleged violation does not trigger an interview process, the student will be notified of the alleged violation. Such notification may be through Arcadia e-mail, written correspondence, in person verbal notification, or another alternative form depending on the specific allegation and surrounding circumstances.

Investigation and Resolution Process: If a student engages in any of the prohibited conduct identified above as a violation of student conduct, or conduct prohibited by any other policy or regulation, the student will be subject to an investigation. This investigation may consist of interviews with the reporting party, any witnesses, and the accused student. However, the scope of the investigative procedure employed will vary depending on the seriousness of the alleged violation and the range of sanctions that would likely be imposed for the alleged violation. The higher the degree of seriousness of the alleged conduct, and the higher the degree of severity of the potential disciplinary action to be imposed, the more robust the investigative process will be. In all cases, the accused student will have an opportunity to respond to the allegations either through an informal meeting with the Resident Director or appointee, through a prescribed mediation process, or at a formal judicial board hearing.

Interim Suspension or Leave

A student who is facing a charge of a serious offense, even before the adjudication of that charge pursuant to the applicable procedure, may be suspended temporarily from participation in their program and/or removed from housing, if in the judgment of the Resident Director or designee, the student is a danger to themselves, or to the safety of persons or property on University premises, or poses a threat of immediate disruptive interference with the normal conduct of University activities. If a student is suspended temporarily and removed from the program and/or housing, the student will bear the cost associated with the suspension or leave (such as airfare or rent for interim housing) until a hearing and or a final decision is reached. The Resident Director or designee shall afford the student the opportunity to challenge the evidence and shall make every effort to have the hearing at the earliest practicable time. However, given the brevity of some programs, a student's challenge to an interim suspension or leave may not occur, in some situations, until after a student has returned to their home institution.

Disciplinary Actions

- **Documentation:** All disciplinary actions taken will be documented.
- **Notification to the Student:** The Resident Director will inform the student and the Director of Student Life at The College of Global Studies in writing of the action to be taken and of the appeal process available to the student, if any. The College of Global Studies may share this information with home campus administration and/or academic offices.
- **Director's Authority:** If the Resident Director or Director of Student Life believes that disciplinary action is appropriate, they are empowered to take disciplinary action in consultation with each other, and host institution or program officials, if applicable.

Sanctions for violation of the Code of Conduct or other policy or regulation:

If a student is found responsible for a violation of a College of Global Studies regulation, policy or procedure the Resident Director or Director of Student Life shall impose one, or a combination of, the below-listed sanctions or alternative sanctions when deemed appropriate. In determining the appropriate sanction to be imposed, the following will generally be considered:

- Seriousness of the conduct;
- Student's academic and behavioral record;
- The student's ability to correct conduct;
- Surrounding circumstances;
- Whether the individual should have been aware of the rule or behavioral violations; and

- Whether there is a reasonable excuse for the infraction.

Typically, sanctions include one, or a combination of the following:

1. Warning

A warning, both oral and written, placing the student on notice that continuation or repetition of the violation or any other violation of regulations may be cause for severe disciplinary action. The College reserves the right to notify a student's home school and/or parents/guardians of both the offense and the disciplinary action taken. Actions taken are recorded in the student's file.

2. Probation

The warning will include a notification to the student that they are on probation, and any additional violations of regulations will lead to more severe sanctions and possible dismissal. To the extent permitted by law and policies, The College reserves the right to notify a student's home school and/or parents/guardians of both the offense and the disciplinary action taken. Actions taken are recorded in the student's file.

3. Restitution

Restitution for damage to or misappropriation of property.

4. Dismissal from Arcadia or host university student housing

This sanction will be imposed in cases of serious or repetitious misconduct in the student housing, or violations of the housing agreement. For a specified period a student is not permitted to reside in or to be a guest in Arcadia residences, but may continue to enroll as a student in the overseas program. Home institutions may be notified of the cause of dismissal from the Arcadia-owned or controlled, or host institution or program residence. Should a student be dismissed from Arcadia or host institution housing, the student will be held responsible for securing alternative accommodation.

5. Dismissal

This sanction is imposed for serious forms of misconduct or for repetitive offenses and entails the student's required and immediate departure from the study abroad program without financial refund. To the extent permitted by law and University policies, notification is given to the home schools and/or parents/guardians as to the cause of the dismissal.

Once a decision has been reached, the accused student shall be informed of the decision and sanctions, if any, in person, by telephone or email by the Resident Director or Director of Student Life.

Official notification will be sent to the student indicating the decision and sanctions.

A copy of the record of the case, and a copy of the letter to the accused student relating the decision, shall be kept on file in the Glenside office of The College of Global Studies for five years. The record is the property of the University and may be reviewed, but not copied, by the accused, accuser(s) and any advisors to those individuals. All reports will be destroyed after five years. The only action recorded on a student's permanent file is dismissal.

Appeals

The availability of an appeal will vary depending on the specific program, but general considerations will include the severity of the violation and the sanction imposed. Any party in a case who has the ability to appeal and wishes to appeal a disciplinary action or a decision shall present, within three days of the receipt of the decision, his or her request in writing to the Director of Student Life. A party may appeal to the Director of Student Life only on the grounds that an error was made which affected the outcome of the case. The letter requesting a review by the Director of Student Life shall state the basis or reasons for the appeal. Disagreement with the decision or disciplinary action is not, in and of itself, grounds for appeal.

If, within a reasonable period after a decision is made, new evidence becomes available, or other extraordinary circumstances are revealed, the Director of Student Life may be asked to reconsider the case. Such a request must be made in writing and addressed to the Director of Student Life, who will then consult with the Resident Director to decide whether to grant the request.

Home School and Parental Notification

The College of Global Studies may notify a student's home school and/or parents about conduct that constitutes a violation of the University's Code of Conduct, regulations, policies or procedures.

Alcohol and Other Drugs Policy

The primary mission of The College is to educate students, in and out of the classroom, to prepare them for life in a rapidly changing global society. We recognize that alcohol and other drugs are part of this global society and therefore approach the issue of substance use in a way that educates, while

holding students accountable for their actions and to the laws of the United States and the country in which they are living and studying. We also know that alcohol and other drug abuse can interfere with a student's ability to fully participate in the educational mission of The College and that alcohol and other drug abuse is the number one health problem on college campuses and study abroad programs. Our primary appeal to students who choose to drink is that they make legal and low-risk choices that do not interfere with their overall health or their ability to take full advantage of the opportunities offered to them at The College and study abroad program.

The College's staff and faculty value personal accountability, care for oneself and respect for others in the community; therefore, in compliance with the Drug Free Workplace act of 1988(P.L. 100-690) and the Drug-Free Schools and Communities Act Amendments of 1989(P.O. 101-206), the College community recommends that all students read and understand the following information. This information applies to all members of the College community.

Standards of Conduct Regarding Alcohol and Drugs

Consistent with U.S. law and the laws of the various host countries in which its overseas programs are located, The College of Global Studies permits the responsible and low-risk use of alcohol by students who are of legal drinking age in their host country; the College does not permit individuals below legal drinking age to use alcohol. Additionally, the College does not permit the use of illegal drugs, as defined by U.S. and local law.

The College of Global Studies does not encourage the use of alcohol. However, The College permits the lawful use and moderate consumption of alcoholic beverages by individuals who are legally entitled to drink. Students of legal age may consume alcohol at approved functions, such as receptions, meals and other College-sponsored events: Only those of legal drinking age will be served (proof of age required). No one who is intoxicated or under the influence of other drugs will be served. Intoxicated individuals or those who are under the influence of other drugs will also be refused admission. No alcohol can be brought into any event, nor leave the premises.

The College does not condone problematic or underage drinking at The College of Global Studies' events, excursions, field study trips, and activities, and reserves the right to discipline cases that are called to its attention.

The College subjects intoxication and disorderly or offensive behavior deriving from the use of alcoholic beverages to disciplinary action, regardless of the student's age and the location where the

behavior occurs. No drugs are permitted, except for those medications that are properly prescribed, in the original container for the person prescribed, and used in the manner prescribed.

Alcohol and Drug Violations (Refers to all students regardless of age)

The following are violations that may result in disciplinary action and may include sanctions such as loss of residential privileges, probation, suspension or expulsion:

1. The possession, consumption, purchase, attempt to purchase, or transportation of alcohol by anyone under legal drinking age on property owned, leased, or controlled by Arcadia University;
2. The furnishing of alcohol to individuals under legal drinking age;
3. The sale, possession, production, purchase, or use of any controlled substance or illegal drug on University premises or at University-sponsored activities; possession of drug paraphernalia used for illegal drugs;
4. The consumption or distribution of alcohol in public places or buildings on Arcadia University premises;
5. The abuse of alcohol that includes but is not limited to the following:
 - a. Violent acts against persons or property;
 - b. Drunkenness;
 - c. Contributing to the abuse by another;
 - d. Driving under the influence;
 - e. Medical emergencies, such as excessive consumption or injury while drinking; and
 - f. Drinking contests, drinking funnels and games, and multiple shots are considered especially dangerous and may be considered abuse of alcohol.

The College of Global Studies reserves the right to discipline students who violate the Alcohol and Other Drugs Policy. Any disciplinary action will be administered in the same way as for violations of the Student Code of Conduct, with the same range of penalties, including warning, probation, interim suspension, restitution, dismissal from student housing, permission to withdraw and expulsion from program.

Searches

Arcadia's responsibility to protect its buildings and property necessitates a right to enter a student's room. The College of Global Studies employees may conduct a search in student housing for, among

other things, inspection, or repair, and insurance of compliance with federal, state, and local and host country criminal laws, and College policies where there is cause to believe that a violation has occurred.

Laws Regulating Use of Alcohol and Other Drugs Financial Aid Implications of Drug Offenses

Effective July 1, 2000, a conviction in a state or federal court for a drug-related offense will result in a student losing eligibility for federal financial aid. For more information please visit the [Students with Criminal Convictions page at the Federal Student Aid website](#).

Medical Amnesty Policy

This policy only provides amnesty from violations of the College's Code of Conduct for students who seek immediate medical attention for themselves or individuals in a life threatening drug/alcohol related condition. The student reporting the incident must state his/her name and remain with the individual in need of medical assistance until help arrives. The policy does not grant amnesty from criminal, civil, or legal consequences for violations of Federal, State, or Local law.

The health and safety of The College's community members is of the highest significance. The College seeks to remove barriers that prevent students from seeking the medical attention they may need. Students may be reluctant to seek assistance for themselves or someone else for fear of disciplinary action. Students must seek immediate medical attention for themselves or others when their health and/or safety are at risk.

1. Students who seek emergency medical attention for themselves due to consumption or use of drugs or alcohol will not be charged with applicable violations of the Code of Conduct provided that the student completes an assessment with a mental health professional identified by the College or its assistance provider and completes any recommended treatment plan within a reasonable time frame to be determined by College staff.
2. Students who seek emergency medical attention for someone else due to consumption or use of drugs or alcohol who are likewise engaged in violations of University policy will not be charged with violations of the Code of Conduct provided that the student completes an assessment at that the student completes an assessment with a mental health professional identified by the College or its assistance provider and completes any recommended treatment plan within a reasonable time frame to be determined by College staff.

3. Students who seek emergency medical attention for someone else due to consumption or use of drugs or alcohol who are not engaged in violations of College policy will be required to meet with a member of the College to discuss the incident.
4. This policy applies only to those students who seek emergency medical assistance for an alcohol or drug-related medical emergency. This policy does not apply to individuals who are found to be under the influence by College employees (i.e. Resident Directors, Center staff, or Resident Life Assistants)
5. The Medical Amnesty Policy is not intended to shield or protect those students that repeatedly violate the Code of Conduct. In egregious cases, or where repeated violations of the Code of Conduct occur, the College reserves the right to take disciplinary action on a case by case basis regardless of the manner in which the incident was reported.

Anti-Hazing Policy

Hazing is a violation of The College of Global Studies policy. A person commits the offense of Hazing if the person intentionally, knowingly, or recklessly for the purpose of initiating, admitting, or affiliating a Student into or with an Organization, or for the purpose of continuing or enhancing a Student's membership or status in an Organization, causes, coerces, or forces a Student to do any of the following:

- Violate Federal or State criminal law;
- Consume any food, liquid, Alcoholic Liquid, Drug, or other substance which subjects the Student to risk of emotional or physical harm;
- Endure brutality of a physical nature, including whipping, beating, branding, calisthenics, or exposure to the elements;
- Endure brutality of a mental nature, including activity adversely affecting the mental health or dignity of the individual, sleep deprivation, exclusion from social contact, or conduct that could result in extreme embarrassment;
- Endure brutality of a sexual nature; and/or
- Endure any other activity that creates a reasonable likelihood of Bodily Injury to the Student.

Hazing shall NOT include reasonable and customary athletic, law enforcement, or military training, contests, competitions, or events.

Any Student, Organization, or other persons associated with an Organization found responsible for Hazing, Aggravated Hazing, or Organizational Hazing, whether occurring on or off campus, may face disciplinary action from the College, and may also face criminal charges under applicable federal law, state law, or local law. Hazing, Aggravated Hazing, and Organizational Hazing are each prohibited by this Policy. It shall not be a defense that the consent of the Student was sought or obtained. It is also not a defense that the conduct was sanctioned or approved by the University. Retaliating in any manner against any individual who reports Hazing, Aggravated Hazing, or Organizational Hazing, or who participates in an investigation of a report of same is prohibited.

For more details on the Anti-Hazing policy, please see

www.arcadia.edu/student-handbook/university-regulations-and-policies/hazing-policy.

Computer Abuse Policy

Responsible use of computer technology on The College study abroad programs is expected of all students. Failure to do so will result in an investigation by the Resident Director or designee.

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

- Unauthorized attempt to modify computer equipment or peripherals. Unauthorized attempt to add/delete/change software, such as games, graphics, operating systems, compilers, utility routines.
- Use of an account without proper authorization from the owner of the account.
- Reading or using private files, including the University's administrative or academic files, without proper authorization, or changing or deleting private files belonging to another user without proper authorization.
- Violations of property rights and copyrights in data and computer programs. Use of software or social media to communicate offensive or obscene messages to other users of the system or any other form of harassment.
- The use of any Arcadia University computer for copying licensed or copyrighted software (whether the software is owned by the University or not) is strictly prohibited.

Copying University-owned licensed or copyrighted software on any other PC. Arcadia University Computer Lab consultants/operators are authorized to monitor and report such violations.

Policy Prohibiting Sexual Misconduct, Relationship Violence, and Stalking

If you believe you are the victim of **Sexual Misconduct, Relationship Violence, or Stalking**, you are encouraged to immediately contact Arcadia on-site staff on the in-country Arcadia emergency phone number for assistance. If you are in imminent danger, you should call the local emergency number for police or medical assistance (the equivalent of 911).

I. SCOPE

This **Policy Prohibiting Sexual Misconduct, Relationship Violence, and Stalking** (“Policy”) applies to conduct committed by students, faculty, employees (union and non-union), volunteers, administrators, independent contractors, and visitors, including any individuals regularly or temporarily employed, studying, living, visiting, conducting business or having any official capacity at the College of Global Studies’ (“College”).

To the extent there is a conflict between this Policy and any other policies of the College, this Policy controls.

The College’s students may also be subject to their home institutions’ policy prohibiting sexual misconduct related to conduct prohibited therein. If a report of sexual misconduct involves an Arcadia University student, the University’s Policy Prohibiting Sexual Misconduct, Relationship Violence and Stalking (found at <http://handbook.arcadia.edu/node/189>) applies and the College will coordinate a response with University officials, as appropriate.

II. POLICY STATEMENT

This Policy prohibits Sexual Misconduct, Relationship Violence, and Stalking (all of which such conduct is defined in Section IV below) of/against College community members of any gender, gender identity, gender expression, or sexual orientation.

This Policy is intended to:

- Provide the College community with a clear set of behavioral standards and prohibited conduct;
- Identify the University’s Title IX Coordinator and the College’s Deputy Title IX Coordinators;
- Outline the College’s response to Sexual Misconduct, Relationship Violence, and/or Stalking;
- Outline where a College community member can obtain support;

- Explain how and where a College community member can make a report to the College;
- Explain where to access more information about reporting to local law enforcement and confidential resources; and,
- Provide information about the grievance procedures resolving a report of Sexual Misconduct, Relationship Violence, and Stalking, including how a report against a student or employee will be investigated, evaluated, and adjudicated by the College, as well as the appeal procedures available.

This Policy is consistent with relevant governmental statutes and regulations, such as Titles VI and VII of the Civil Rights Act of 1964, Title IX of the Education Amendments of 1972, The Age Discrimination in Employment Act, The Americans with Disabilities Act and ADA Amendments Act, The Equal Pay Act, The Uniform Services Employment and Reemployment Rights Act, The Pennsylvania Human Relations Act, and the Violence Against Women Reauthorization Act of 2013.

III. POLICY

The College is committed to providing a learning and working environment that is free from all forms of discrimination and conduct that can be considered unreasonably harassing, coercive, or disruptive, including Sexual Harassment and/or Sexual Violence. The College will not tolerate Sexual Misconduct, Relationship Violence, and Stalking.

Sexual Misconduct, Relationship Violence, and Stalking pose a threat both to individual members of the College community and to the community collectively. Acts of Sexual Misconduct, Relationship Violence, and Stalking represent a fundamental failure to recognize and respect the intrinsic worth and dignity of other members of the community. Such acts are contrary to the values and standards of the College community and are against College policy. They may also constitute criminal conduct under local, state, or federal laws (or a combination thereof).

The College is committed to establishing clear and effective policy and procedures, a coordinated education and prevention program, and prompt and equitable procedures for resolution of complaints of such conduct. These policy and procedures are intended to guide community members who have experienced or been affected by Sexual Misconduct, Relationship Violence, and/or Stalking.

The College is prepared to take all appropriate steps to prevent and respond to such behavior. Recognizing that each situation has its own characteristics, the College will respond promptly and equitably while tailoring the solution to best fit the situation. Sexual Misconduct, Relationship Violence,

and Stalking encompass a broad spectrum of conduct, and the College will respond accordingly, considering both the severity of the alleged offense and the threat the conduct poses to the community.

Jurisdiction

The College has jurisdiction over complaints of Sexual Misconduct, Relationship Violence, and Stalking occurring on College property or at any College-sponsored off-campus program or activity or that is likely to have a substantial effect on or pose a threat of danger to any member of the College community or College life or activities.

Prohibited Conduct

The Conduct prohibited by the Policy includes:

1. Sexual Misconduct, including:
 - a. Sexual Harassment
 - b. Sexual Assault
 - c. Sexual Violence
2. Relationship Violence, including:
 - a. Domestic Violence
 - b. Dating Violence
3. Stalking
4. Retaliation

Annual Review

The Vice President of the College and the College's Director of Health, Safety, and Security will review this Policy on an annual basis in conjunction with the University's Title IX Coordinator in order to capture evolving legal requirements and improve the delivery of service based on a review of experience each academic year. The College may choose to perform additional review and make additional updates as appropriate through the academic year.

College students and employees are responsible for reviewing the most current version of this Policy. Please contact the Deputy Title IX Coordinator if you have questions.

IV. DEFINITIONS

The conduct prohibited by the Policy and important terms and concepts are defined as follows:

A. Alcohol and Other Drugs: In general, the University considers sexual contact while under the influence of alcohol and/or other drugs to be risky behavior. Alcohol and other drugs impair a person's decision-making capacity, awareness of consequences, and ability to make informed judgments. From the perspective of the Complainant, the use of alcohol and/or other drugs can limit a person's ability to give Consent knowingly and voluntarily. From the perspective of a Respondent, the use of alcohol and/or other drugs can create an atmosphere of confusion over whether Consent has been given knowingly and voluntarily. It is especially important, therefore, that anyone engaging in sexual activity be aware of the other person's level of intoxication. If there is any doubt as to the level or extent of the other individual's intoxication or impairment, the prudent course of action is to forgo or cease any sexual contact or activity.

The perspective of a reasonable person will be the basis for determining whether a Respondent should have been aware of the extent and amount of the ingestion of alcohol and/or other drugs by the Complainant or of the extent to which the use of alcohol and/or other drugs impacted a Complainant's ability to give Consent. For example, an individual who is in a blackout may appear to act normally and be giving Consent but may not actually have conscious awareness, the ability to Consent, or later recall the events in question. The extent to which a person in this state affirmatively gives mutually understandable words and/or clear, unambiguous actions indicating a willingness to engage in sexual activity and the other person is unaware – or reasonably could not have known – of the person's level of alcohol consumption and/or level of impairment must be evaluated in determining whether Consent has been given.

Being intoxicated or impaired by alcohol and/or other drugs is never an excuse for Sexual Harassment, Sexual Misconduct, or Sexual Violence and does not diminish one's responsibility to obtain Consent.

B. Coercion: A direct or implied threat of force, violence, danger, hardship, or retribution sufficient to persuade a reasonable person of ordinary susceptibility to perform an act which otherwise would not have been performed or acquiesce in an act to which one would not have submitted. Coercive behavior differs from seductive behavior based on the type of pressure someone uses to get Consent from another. A person's words or conduct cannot amount to coercion unless they wrongfully impair another

individual's freedom of will and ability to choose whether or not to engage in sexual activity. When an individual makes it clear that he/she/zi does not want to engage in sexual activity, that he/she/zi wants to stop, or that he/she/zi does not want to go past a certain point of sexual interaction, continued pressure beyond that point can be coercive.

C. College: The College of Global Studies

D. Complainant: The alleged victim, in other words, the individual(s) who has experienced a possible instance of Sexual Misconduct, Relationship Violence, and/or Stalking, regardless of whether that individual makes a report or seeks formal disciplinary action. *Note: As explained below, the University reserves the right to serve as Complainant and to initiate disciplinary proceedings in appropriate circumstances, even where the alleged victim does not wish to make a report or to proceed with disciplinary action him/ herself.*

E. Consent: Consent to engage in sexual activity must be informed, knowing and voluntary. It must exist from the beginning to end of each instance of sexual activity and to each form of sexual contact. Consent consists of an outward demonstration indicating that an individual has freely chosen to engage in sexual activity. It is demonstrated through mutually understandable words and/or actions that clearly indicate a willingness to engage freely in sexual activity. In the absence of an outward demonstration, Consent does not exist.

Guidance for Consent:

- Each participant in a sexual encounter must Consent to each act of sexual activity. Consent to one form of sexual activity does not constitute Consent to engage in all forms of sexual activity.
- Consent is active, not passive. Consent may not be inferred from silence, passivity, lack of resistance, or lack of an active response alone. Relying on non-verbal communication can lead to misunderstanding. A person who does not physically resist or verbally refuse sexual activity is not necessarily giving Consent. When Consent is requested verbally, absence of any explicit verbal response constitutes lack of Consent. A verbal “no” constitutes lack of Consent, even if it sounds insincere or indecisive.
- Prior to engaging in sexual activity, each participant should ask himself or herself the question, “has the other person consented?” If the answer is “no” or “I’m not sure,” then the participant should recognize that Consent has not been demonstrated.
- If at any time during the sexual activity, any confusion or ambiguity arises as to the willingness of the other individual to proceed, both parties should stop and clarify verbally the other’s willingness to continue before continuing such activity.

- Either party may withdraw Consent at any time. Withdrawal of Consent must be outwardly demonstrated by words and/or actions that clearly indicate a desire to end sexual activity. Once withdrawal of Consent has been expressed, sexual activity must cease.
- A current or previous dating or sexual relationship, by itself, does not automatically give either initial or continued Consent to sexual activity. Even in the context of a relationship, there must be mutually understandable communication that clearly indicates a willingness to engage in sexual activity.
- Consent is not effective if it results from the use of physical force, threat of physical force, intimidation, coercion, incapacitation or any other factor that would eliminate an individual's ability to exercise his/her/hir own free will to choose whether or not to have sexual contact.
- The responsibility of obtaining Consent rests with the individual who initiates the sexual activity. An individual who initiates sexual activity should be able to explain the basis for his/her/hir belief that Consent existed.

F. Force: Force is the use or threat of physical violence or intimidation to overcome an individual's freedom to choose whether or not to participate in sexual activity.

G. Home Institution: The institution in which a student is officially enrolled and matriculated as a degree-candidate.

H. Host Institution: The institution in which a student is enrolled temporarily for a period of study while overseas.

I. Incapacitation: An individual who is incapacitated cannot Consent to sexual activity. Incapacitation is defined as the inability, temporarily or permanently, to give Consent, because an individual is mentally and/or physically helpless, asleep, unconscious, or unaware that the sexual activity is occurring. Incapacitation is when an individual lacks the ability to make informed, rational judgments to engage in sexual activity because he/she/zi lacks conscious knowledge of the nature of the act (e.g., to understand who, what, when, where, why or how of the sexual interaction.)

While Incapacitation may result from the use of alcohol and/or drugs, consumption of alcohol or other drugs alone is insufficient to establish Incapacitation. Where alcohol and/or other drugs (including prescription drugs) are involved, Incapacitation is a state beyond drunkenness or intoxication. The impact of alcohol and other drugs varies from person to person. Warning signs that a person may be approaching Incapacitation may include slurred speech, vomiting, unsteady gait, odor of alcohol or other substance, combativeness, and/or emotional volatility.

Evaluating Incapacitation requires an assessment of how the consumption of alcohol and/or drugs affects an individual's:

- Decision making ability;
- Awareness of consequences;
- Ability to make informed judgments; or
- Capacity to appreciate the nature and quality of the act.

Evaluating Incapacitation also requires an assessment of whether a Respondent should have been aware of the Complainant's Incapacitation based on objectively and reasonably apparent indications of impairment when viewed from the perspective of a sober, reasonable person in the Respondent's position.

J. Relationship Violence: Includes both Domestic Violence and Dating Violence (as each term is further defined below).

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

2. Dating Violence: Violence committed by a person who is or has been in a social relationship of a romantic or intimate nature with the alleged victim. The existence of such a relationship will be determined based on the reporting party's statement, taking into consideration the following factors: (a) the length of the relationship, (b) the type of relationship, and (c) the frequency of interaction between the persons involved in the relationship. Dating Violence includes, but is not limited to, sexual or physical abuse or threat of such abuse. Dating Violence, for purposes of this Policy, does not include emotional abuse.

K. Reporter: The individual reporting alleged conduct prohibited by this Policy. The Reporter may be the Complainant or any other person.

L. Respondent: The individual(s) who has been accused of Sexual Harassment, Sexual Violence, Sexual Assault, Intimate Partner Violence, Domestic Violence, Dating Violence, and/or Stalking.

M. Responsible Employee: Those people the University has designated as required to report instances of Sexual Misconduct, Relationship Violence and/or Stalking that they become aware of (see Section V. D for further description).

N. Sexual Misconduct: An umbrella term encompassing a range of behavior, including Sexual Assault, Sexual Exploitation, Sexual Harassment, and Sexual Violence (as each term is further defined below).

1. Sexual Assault: Having or attempting to have sexual intercourse or sexual contact with another individual without Consent. This includes sexual intercourse or sexual contact achieved by the use or threat of force or Coercion, where an individual does not Consent to the sexual act, or where an individual is incapacitated.

Relating to non-consensual sexual intercourse: having or attempting to have sexual intercourse with another individual without Consent. Sexual intercourse includes vaginal or anal penetration, however slight, with a body part or object, or oral penetration involving genital-to-mouth contact.

Relating to non-consensual sexual contact: having or attempting to have sexual contact with another individual without Consent. Sexual contact includes kissing, touching the intimate parts of another, causing the other to touch one's intimate parts, or disrobing or exposure of another for the purposes of sexual gratification, and without permission. Intimate parts may include the breasts, buttocks, mouth or any other part of the body that is touched in a sexual manner for the purpose of sexual gratification.

Sexual Assault is also prohibited by federal law. For purposes of this Policy, prohibited Sexual Assault includes: rape, statutory sexual assault, sexual assault, indecent assault, fondling, and incest, as defined by the FBI's Uniform Crime Reporting Program (available at <http://www.fbi.gov/about-us/cjis/ucr/nibrs/nibrs-user-manual>),

2. Sexual Exploitation: An act or acts committed through non-consensual abuse or exploitation of another person's sexuality for the purpose of sexual gratification, financial gain, personal benefit or advantage, or any other non-legitimate purpose. The act or acts of Sexual Exploitation are prohibited even though the behavior does not constitute any of the other prohibited Sexual Misconduct. Examples include, but are not limited to:

- Observing another individual's nudity or sexual activity or allowing another to observe consensual sexual activity without the knowledge and consent of all parties involved;
- Non-consensual streaming of images, photography, video, or audio recording of sexual activity or nudity;

- Prostituting another individual;
- Exposing one's genitals in non-consensual circumstances;
- Knowingly exposing another individual to a sexually transmitted disease or virus without his/her/hir knowledge; and
- Inducing Incapacitation for the purpose of making another person vulnerable to non-consensual sexual activity.

3. Sexual Harassment: Any unwelcome sexual advance, request for sexual favor(s), or other unwelcome verbal, nonverbal, graphic or physical conduct of a sexual nature when one of the following conditions is present: (1) submission to or rejection of such conduct is an explicit or implicit condition of an individual's employment, evaluation of academic work, or participation in social, co- or extra-curricular activities; OR (2) submission to or rejection of such conduct is used as the basis for decisions affecting the individual (i.e., *quid pro quo*); OR (3) such conduct is so severe or pervasive, or so objectively offensive, that it has the purpose or effect of unreasonably interfering with an individual's work or academic performance by creating an intimidating, hostile, humiliating, demeaning, or sexually offensive working, academic, or social environment. The purpose or effect will be evaluated based on the perspective of a reasonable person in the position of a Complainant.

A single, isolated incident of Sexual Harassment may create a hostile environment if the incident is sufficiently severe. The more severe the conduct, the less need there is to show a repetitive series of incidents to create a hostile environment, particularly if the harassment is physical.

Sexual Harassment:

- May be blatant and intentional and involve an overt action, a threat or reprisal, or may be subtle and indirect, with a coercive aspect that is unstated.
- Does NOT have to include intent to harm, be directed at a specific target, or involve repeated incidents.
- May be committed by anyone, regardless of gender, age, position or authority. While there is often a power differential between two persons, perhaps due to differences in age, social, educational, or employment relationships, harassment can occur in any context.
- May be committed by a stranger, an acquaintance, or someone with whom the Complainant has or had an intimate or sexual relationship.

- May be committed by or against an individual or may be a result of the actions of an organization or group.
- May occur by or against an individual of any sex, gender identity, gender expression or sexual orientation.
- May occur in the classroom, in the workplace, in residential settings, or in any other setting.
- May be a one-time event or can be part of a pattern of behavior.
- May be committed in the presence of others or when the parties are alone.
- May affect the Complainant, Reporter and/or third parties who witness or observe harassment.

4. Sexual Violence: Physical sexual acts perpetrated against a person's will or where a person is incapable of giving consent due to incapacitation. Sexual Violence includes Sexual Exploitation, as the term is defined above.

O. Retaliation: Act(s) or attempt(s) to act out or seek retribution against the Complainant, Reporter, Respondent, or any other individual or group of individuals involved in the investigation and/or resolution of an allegation of Sexual Misconduct, Relationship Violence, or Stalking. Any individual or group of individuals, not just a Respondent, Reporter or Complainant, can commit retaliation. Retaliation can take many forms, including continued harassment or violence, and/or other forms of harassment.

P. Stalking: a course (more than once) of unwelcome conduct directed at another individual that could be reasonably regarded as likely to alarm, harass, and/or cause fear of harm or injury to that person. The feared harm or injury may be physical, emotional, or psychological, to the personal safety, property, education, or employment of that individual. Stalking includes cyber-stalking, a particular form of stalking in which electronic media such as the Internet, social networks, blogs, cell phones, texts, or other similar devices or forms of contact are used to pursue, harass, or to make unwelcome contact with another person in an unsolicited fashion. Examples include, but are not limited to:

- Unwelcome and repeated visual or physical proximity to a person;
- Repeated oral or written threats;
- Extortion of money or valuables;
- Implicitly threatening physical conduct or any combination of these behaviors directed toward an individual person;
- Unwelcome/unsolicited emails, instant messages, and messages on online bulletin boards;

- Unwelcome/unsolicited communications about a person, their family, friends, or co-workers; and/or,
- Sending/posting unwelcome/unsolicited messages with another username.

Although the focus of this Policy is on gender-based Stalking, Stalking of any type is prohibited.

Q. Third Party: Any other participant in the process, including a witness to the conduct, an individual who makes a report on behalf of another person, or an affected community member.

R. University: Arcadia University, its colleges, schools, affiliates, divisions and subsidiaries, excluding the College.

V. REPORTING, RESOURCES, AND PROCESSES

The College is committed to treating all members of the community with civility, dignity, empathy, and respect. Any individual affected by Sexual Misconduct, Relationship Violence, or Stalking, whether as a Complainant, a Reporter, a Respondent, or a Third Party, will have equal access to support services through the College. The College recognizes that deciding whether to make a report and choosing how to proceed can be difficult decisions. Accordingly, the College encourages any individual who has questions or concerns to seek the support of available resources. These resources can provide guidance in making decisions, information about available resources and procedural options, and assistance to any party in the event that a report and/or resolution under this Policy is pursued. Individuals are encouraged to use all available resources, regardless of when or where the incident occurred.

A. Emergency/Immediate Reporting Options

The College encourages all individuals to seek assistance from a medical provider and/or law enforcement immediately after an incident of sexual harassment, sexual violence, sexual assault, domestic violence, dating violence, or stalking. This is the best option to ensure preservation of evidence and to begin a timely investigative and remedial response. It's important to understand, however, the legal implications of seeking assistance from a medical provider and/or law enforcement in your host country in advance, as legal systems in certain countries require that local law enforcement be notified if a sexual assault is reported to an organization like a hospital or university, regardless of the wishes of the parties involved. On-site staff can guide you in this process.

The College will assist any College community member to get to a safe place and will provide coordination with law enforcement when possible, information about the College's resources and complaint processes, and transportation to the hospital.

Contact on-site staff at your program site for immediate assistance. Local staff will be able to tell you how to make a police report, if that is your choice, and will assist you in getting the other services you need.

Options for Contacting Law Enforcement

Contact local law enforcement if you are in any immediate danger.

As mentioned above, local College staff will be able to tell you how to make a police report, if that is your choice, and can help you identify the legal implications of reporting an incident to local law enforcement in advance. Refer to your in-country student handbook for specific information about law enforcement options in your host country.

Options for Seeking Medical Attention

It is strongly encouraged that victims of sexual violence seek medical attention immediately. A medical provider can provide emergency and/or follow-up medical services and provide a forum to discuss any healthcare concerns related to the incident. A medical exam will treat any injury or trauma and address concerns about sexually transmitted infections and pregnancy. Medical evidence, which can only be collected at a hospital, is of crucial value if an assault victim decides to prosecute through the local criminal justice system. Evidence should be collected as close as possible to the assault, usually within 48 hours. If you choose to have a forensic medical exam, you should not bathe, douche, brush your teeth or hair, drink, eat, change your clothing or wash your bedding to preserve evidence. If you need to change your clothing, you should place it in a paper bag.

The College encourages individuals to bring a support person for accompaniment during the exam. On-site staff is also available to transport you to a medical exam.

Refer to the list of hospitals and medical providers offered by Arcadia staff or your host institution, or contact your student health insurance provider to identify medical providers in your host city. **NOTE: Legal systems in certain countries require that local law enforcement be notified if a sexual assault is reported to an organization like a hospital or university, regardless of the wishes of the parties involved.**

B. Support Resources

College community members have access to a variety of resources. The University and College staff listed below are trained to support individuals affected by alleged sexual misconduct and to coordinate with the Title IX Coordinator consistent with the College's commitment to a safe and healthy educational environment. While not bound by confidentiality, these resources will maintain the privacy of an individual's information within the limited circle of those involved in the disciplinary investigation and resolution process.

On-site staff are available 24-hours a day. In an emergency, contact the emergency phone number for your program. The University Department of Public Safety is also available 24-hours a day, year round at +1-215-572-2999 and can contact The College staff listed below for assistance on your behalf.

University and College resources available Monday through Friday 9:00 am to 5:00 pm ET:

Title IX Coordinator

Arcadia University

Nora Nelle

+1-215-517-2659
nellen@arcadia.edu
782 Limekiln Pike
Glenside, PA 19038

Deputy Title IX Coordinator and

Director of Student Life and Support Services, The College of Global Studies

Tim Barton

+1-215-572-4070
bartont@arcadia.edu
Larsen Hall
450 S. Easton Road
Glenside, PA 19038

Deputy Title IX Coordinator and

Director of Health, Safety, and Security, The College of Global Studies

Maureen Gordon

+1-215-572-2822

gordonm@arcadia.edu
Larsen Hall
450 S. Easton Road
Glenside, PA 19038

Students, faculty, and staff may also access resources located in the local community. These organizations can provide crisis intervention services, counseling, medical attention, and assistance in interfacing with the criminal justice system. All individuals are encouraged to use the resources that are best suited to their needs and should inquire of each resource as to the level of confidentiality it can provide.

C. Reporting

The College is committed to providing a variety of welcoming and accessible ways for community members to voice concerns about and report instances of alleged Sexual Misconduct, Relationship Violence, and Stalking. Reporting an issue is the best way for the community to help an individual receive the resources, support, and accommodations available at a particular College location, as well as to preserve pertinent information and tangible materials. Not only does reporting help the individual, communication about issues related to Sexual Misconduct, Relationship Violence, and Stalking can also help to prevent future occurrence of such issues. The information community members report can illuminate patterns of behavior, immediate threats to the safety of the community, and systemic issues.

At the time a report is made, a Complainant does not have to decide whether or not to request a formal resolution/disciplinary process. Choosing to make a report, and deciding how to proceed after making the report, can be a process that unfolds over time. College officials will do everything possible to respect an individual's autonomy in making these important decisions and to provide support that will assist each individual in making that determination. Unless there is an immediate threat to the community or a minor is involved, the Complainant will set the pace and make decisions about how best to proceed (including not naming the other party/ies at the time of the report).

An individual who reports to the College that he/she/zi has been a victim of Sexual Misconduct, Relationship Violence, or Stalking, regardless of whether the offense occurred on or off campus, shall be provided with a written explanation of the his/her/hir rights and options, including: (1) procedures victims should follow if an incident of Sexual Misconduct, Relationship Violence, or Stalking has occurred; (2) notification about existing assistance and services available for victims; and (6) notification about options for accommodations for victims; (3) procedures for disciplinary proceedings in cases of

Sexual Misconduct, Relationship Violence, and Stalking; (4) information about how the University will protect the confidentiality of victims; (5) the possible sanctions or protective measures that the University may impose following a final determination of a disciplinary proceeding regarding Sexual Misconduct, Relationship Violence, and Stalking.

Contact on-site staff at your program site for immediate assistance. Local staff will be able to tell you how to make a police report, if that is your choice, and will assist you in getting the other services you need.

Statement Regarding Privacy

The College is committed to protecting the privacy of all individuals involved in a report of Sexual Misconduct, Relationship Violence, and/or Stalking. In any report, investigation, or resolution of a report under this Policy, every effort will be made to protect the privacy interests of all individuals involved in a manner consistent with the need for a thorough review of the allegation(s).

With limited exceptions, such as mandatory reports to law enforcement or compliance with lawfully issued process, the privacy of all parties will be respected and safeguarded. Information related to a report under this Policy will only be shared with those College or University employees who “need to know” in order to assist in the review, investigation, or resolution of the report. All College employees or others involved in the College’s Title IX response, including the University Title IX Coordinator, the Deputy Title IX Coordinators, Resident Directors, members of the Student Affairs team, investigators and adjudicators, are offered specific training and guidance about safeguarding private information. Please note that Resident Directors, Resident Life Assistants, and Student Services personnel are required to report any alleged violations of this Policy to the Resident Director at their location and to Director of Student Life and Support Services and/or Director of Health, Safety, and Security in the Glenside office.

In addition, the College may be required to notify the appropriate official at a Complainant or Respondent’s home institution of a report of sexual misconduct.

When responding to a report of misconduct under this Policy, the College will assess a Complainant’s request for confidentiality consistent with the subsection titled Requests for Confidentiality below.

Reporting to Responsible Employees

The College recognizes that a Reporter may choose to report allegations of Sexual Misconduct, Relationship Violence, and/or Stalking to a trusted employee of the College. The College has designated

all College employees, including faculty, adjunct and visiting faculty, administrators, and staff, as Responsible Employees. The College has not designated employees of the host institution as Responsible Employees. If you have questions about who is a Responsible Employee please contact the Deputy Title IX Coordinator.

If a Responsible Employee becomes aware of an alleged act of Sexual Misconduct, Relationship Violence, and/or Stalking, then he/she must promptly contact the College's Deputy Title IX Coordinator and Resident Director and report what he/she knows. The Deputy Title IX Coordinator is specifically charged with coordinating an initial assessment of the report, initiating the investigation, and responding to allegations of Sexual Misconduct, Relationship Violence, and/or Stalking to stop the harassment, prevent its recurrence, and address its effects.

When a Responsible Employee believes that an individual may be about to report an alleged act of Sexual Misconduct, Relationship Violence, and/or Stalking, or an individual has already done so, the Responsible Employee should take prompt steps to advise the individual that the College will maintain the privacy of the information, but that the Responsible Employee cannot maintain complete confidentiality and is required to report the alleged conduct and to communicate the names of the parties involved, if revealed, to the Deputy Title IX Coordinator.

If the Reporter wishes to reveal information, or already has done so, but would like to remain anonymous, the Responsible Employee should inform the Reporter that his/her/hir name will be shared with the Deputy Title IX Coordinator but that the Deputy Title IX Coordinator may not automatically initiate a College investigation against the individual's wishes. Please refer to the subsection of these procedures titled Requests for Confidentiality for information on how the College will weigh, and respond to, requests for confidentiality.

All College community members, even non-employees, are strongly encouraged to report information regarding any incident of Sexual Misconduct, Relationship Violence, and/or Stalking to a member of the Title IX Team.

Confidential Reporting Options

The College encourages all community members to make a prompt report of any alleged incident of Sexual Misconduct, Relationship Violence or Stalking to the College and/or to local law enforcement as appropriate. The College recognizes, however, that not every individual is prepared to make a report to

the College or to law enforcement. As such, the College offers the below confidential resources to students and employees.

Students wishing to obtain **confidential** support or resources, or to report information to a confidential location, are encouraged to contact a counseling professional who is bound by separate laws of confidentiality and will not share a report with other members of the College unless the reporting student wishes to do so or there is a legal exception that requires such additional reporting (for example, circumstances that give rise to an imminent safety concern). Refer to the list of counseling resources provided by Arcadia staff or your host institution, or contact your student health insurance provider to identify counseling options in your host city.

D. Responding to a Report: The Title IX Team

Title IX Coordinator and Deputy Coordinators

The University has appointed a Title IX Coordinator. This office is currently held by Nora Nelle. The Title IX Coordinator can be contacted by telephone, e-mail, or in person during regular office hours (8:30 am - 5:00 pm, Monday – Friday).

Nora Nelle

Title IX Coordinator

+1-215-517-2659
nellen@arcadia.edu
782 Limekiln Pike
Glenside, PA 19038

The Title IX Coordinator oversees the University's centralized review, investigation, and resolution of reports of Sexual Misconduct, Relationship Violence, and Stalking. The Coordinator also coordinates the University's compliance with Title IX and VAWA.

The Title IX Coordinator is:

- Responsible for oversight of the investigation and resolution of all reports of Sexual Misconduct, Relationship Violence, and/or Stalking;
- Knowledgeable and trained in relevant federal and state law and University policy and procedure;

- Available to advise any individual, including a Complainant, a Reporter, a Respondent, or a Third Party, about the courses of action available at the University, both informally and formally;
- Available to provide assistance to any University member regarding how to respond appropriately to reports of Sexual Misconduct, Relationship Violence, and/or Stalking; and,
- Responsible for monitoring full compliance with all requirements and timelines specified in the complaint procedures.

The University has also designated several Deputy Title IX Coordinators, whose responsibilities are overseen by the Title IX Coordinator. Deputy Title IX Coordinators are also knowledgeable and trained on University policy and procedure, available to advise any individual about the courses of action available and provide assistance to any University member regarding how to respond to reports. Deputy Title IX Coordinators for the College of Global Studies are:

Tim Barton
 Director of Student Life and Support Services
 The College of Global Studies
 +1-215-572-4070; bartont@arcadia.edu

Maureen Gordon
 Director of Health, Safety, and Security
 The College of Global Studies
 +1-215-572-2822; gordonm@arcadia.edu

The College's Deputy Title IX Coordinator, working with the Title IX Team, will ensure that the College responds to all reports in a timely, effective, and consistent manner. The College's Title IX Team consists of the College's Director of Health, Safety, and Security, Director of Student Life and Support Services, Resident Directors the University's Title IX Coordinator, and others as applicable, such as the University's Dean of Students and Director of Public Safety. The Title IX Team is charged with coordinating the review, investigation, and resolution of all reports to ensure consistent responsiveness and the integrated provision of interim remedies and accommodations to support the individuals involved and to protect the College community. The College is committed to using a consistent and informed response to create a culture of respect and accountability. The Title IX Team is positioned to provide seamless support, assess individual and campus safety needs, and effectively respond to allegations of sexual harassment and sexual misconduct. Not every member of the Title IX Team is involved in every issue; only those who "need to know" attend to the issue at hand.

The College will promptly review and respond to all reports of Sexual Misconduct, Relationship Violence, and Stalking in an integrated, consistent manner that treats everyone with dignity and respect.

The College will approach each report with an earnest intent to understand the perspective and experiences of each individual involved in order to ensure fair and impartial evaluation and resolution.

Requests for Confidentiality

The College is committed to protecting the privacy of all individuals in a report of Sexual Misconduct, Relationship Violence, or Stalking. In any report, investigation, or resolution of a report under this Policy, every effort will be made to protect the privacy interests of all individuals involved in a manner consistent with the need for a thorough review of the allegation(s). **NOTE: Legal systems in certain countries require that local law enforcement be notified if a sexual assault is reported to an organization like a hospital or university, regardless of the wishes of the parties involved.**

If a Complainant discloses an incident to a Responsible Employee but then requests that his/her/hir name or other identifiable information not be shared or requests that no investigation into a particular incident be conducted or disciplinary action taken, the College will weigh that request against the College's obligation to provide a safe, non-discriminatory environment for all community members, including the Complainant, and to afford a Respondent fundamental fairness by providing notice and an opportunity to respond before action is taken against a Respondent.

If the College determines that it can honor the request for confidentiality, a Complainant must understand that the College's ability to meaningfully investigate the incident and pursue disciplinary action against the alleged perpetrator(s) may be limited.

When weighing a Complainant's request for confidentiality or that no investigation or discipline be pursued, the Deputy Title IX Coordinator will consider a range of factors, including the following:

- The increased risk that the alleged perpetrator will commit additional acts of sexual or other violence, such as:
 - Whether there have been other Sexual Violence complaints about the same alleged perpetrator;
 - Whether the alleged perpetrator has a history of arrests or records from a prior school indicating a history of violence;
 - Whether the alleged perpetrator threatened further Sexual Violence or other violence against the Complainant or others;
- Whether the Sexual Violence was committed by multiple perpetrators;
- Whether the Sexual Violence was perpetrated with a weapon;
- Whether the Complainant is a minor;

- Whether the College possesses other means to obtain relevant evidence of the Sexual Violence (e.g., security cameras or personnel, physical evidence);
- Whether the report reveals a pattern of perpetration (e.g., via illicit use of drugs or alcohol) at a given location or by a particular group.

Although rare, there are times when the College may not be able to honor a Complainant's request for confidentiality in order to provide a safe, non-discriminatory environment for all students. The presence of one or more of the above factors could lead the College to investigate and, if appropriate, pursue disciplinary action. If, for example, the school has credible information that the alleged perpetrator has committed one or more prior acts of Sexual Violence, the balance of factors would compel the school to investigate the allegation and, if appropriate, pursue disciplinary action. If none of these factors is present, the College will likely respect the Complainant's request for confidentiality.

If the College determines that it cannot maintain a Complainant's confidentiality, the College will not require a Complainant to participate in any investigation or disciplinary proceeding against his/her/hir wishes. The College will inform the Complainant prior to starting an investigation and will, to the extent possible, only share information with people responsible for handling the University's response. The University will remain ever mindful of the Complainant's well-being, and will take ongoing steps to protect the Complainant from retaliation and harm and work with the Complainant to create a safety plan.

The College is under a continuing obligation to address the issues of Sexual Violence program-wide. All reports of Sexual Violence will prompt the College to consider broader remedial action, such as increased monitoring, supervision or security at locations where the reported Sexual Misconduct occurred; increasing education and prevention efforts, including to targeted groups; conducting climate assessments; and/or revisiting its policies and practices.

If the College determines that it can respect a Complainant's request for confidentiality, the College will also take immediate action as necessary to protect and assist the Complainant, offering any appropriate and reasonable Interim Measures (as defined in section E below). The College will:

- Assist the Complainant in accessing available victim advocacy, academic support, counseling, disability, and health or mental health services;
- Provide other security and support, which could include helping arrange a change of living or working arrangements or course schedules or adjustments for assignments or tests; and

- Inform the Complainant of the right to report a crime to local law enforcement and provide the Complainant with assistance if the he/she/zi wishes to do so.

Reporting Considerations: Timeliness of Report, Location of Incident

Complainants, Reporters, and third party witnesses are encouraged to report allegations of Sexual Misconduct, Relationship Violence, and Stalking as soon as possible in order to maximize the College's ability to respond promptly and effectively. The College does not, however, limit the timeframe for reporting. If the Respondent is no longer a student or employee, the College will still seek to meet its Title IX obligation by taking steps to end the harassment, prevent its recurrence, and address its effects.

Because Sexual Misconduct, Relationship Violence, and Stalking frequently involve interactions between persons that are not witnessed by others, reports of Sexual Misconduct, Relationship Violence, and Stalking cannot always be substantiated by additional evidence. Lack of corroborating evidence or "proof" should not discourage individuals from reporting of sexual harassment, sexual violence, sexual assault, intimate partner violence, domestic violence, dating violence, and/or stalking under these procedures.

Complaints may be filed by students against any community member or group, including another student, a faculty member, or a staff member.

Coordination with Law Enforcement

The College will assist the Reporter(s) or Complainant(s) in making a criminal report and will cooperate with law enforcement agencies if the Complainant(s) decides to pursue criminal action.

A Complainant may seek resolution through the College's grievance procedures, may pursue criminal action, may choose one but not the other, may choose both, or may choose not to pursue action in either process. Law enforcement's investigation, decision to prosecute, or outcome of any investigation and/or prosecution are not determinative on whether the College takes action against a Respondent or are not determinative of Sexual Misconduct, Relationship Violence, or Stalking, as defined in this Policy.

Proceedings under these procedures for an alleged violation of this Policy may be carried out prior to, simultaneously with, or following civil or criminal proceedings off-campus. The College's policy, definitions, and applicable burden of proof may differ from the law of the local jurisdiction.

Amnesty for Alcohol and Other Drug Use

The College seeks to remove any barriers to reporting. The College will generally offer any student, whether the Complainant, Reporter or a third party, who reports allegations of Sexual Misconduct, Relationship Violence, and/or Stalking, limited immunity from being charged for policy violations related to the personal ingestion of alcohol and/or other drug use, provided that any such violation(s) did not, and do not, place the health and safety of any person at risk. The College may choose, however, to pursue educational interventions for those individuals.

Bystander Intervention

The College considers the welfare of students, faculty, and staff to be of paramount importance. The College recognizes that at times students may need assistance. The College urges all community members to offer help and assistance to others in need and take reasonable and prudent actions to prevent or stop an act of sexual misconduct. Taking action may include indirect or direct intervention when safe to do so, enlisting the assistance of friends, contacting law enforcement, and/or seeking assistance from a person in authority, such as faculty members, Resident Directors, or law enforcement.

Statement Against Retaliation

The College will not tolerate retaliation in any form. The College recognizes that retaliation can take many forms, it may be committed by or against an individual or a group, and that a Complainant, Reporter, Respondent, Third Party, and any employee charged with implementing these procedures may also be the subject of retaliation by another individual. It is a violation of University policy to retaliate in any way against a student or employee because he/she/zi raised allegations of Sexual Misconduct, Relationship Violence, and/or Stalking.

An individual reporting alleged Sexual Misconduct, Relationship Violence, and Stalking is entitled to protection from any form of retaliation following a report that is made in good faith, even if the report is not later substantiated.

False Reporting

The College takes the validity of information very seriously, as a charge of Sexual Misconduct, Relationship Violence, and/or Stalking may have severe consequences. A Complainant or reporting party who makes a report that is later found to be intentionally false or made maliciously without regard for truth may be subject to disciplinary action. This provision does not apply to reports made in good faith, even if the allegations in the report are not substantiated through an investigation and/or adjudication.

Group Infractions

When members of a group or organization, individuals acting collusively, or members of a club or team act in concert in violation of the Policy, they may be charged as a group, and a hearing may proceed against the group as joint Respondents.

College as Complainant

There may be circumstances when a Complainant chooses not to make a report to the College, does not wish to initiate disciplinary proceedings, or decides he/she no longer wishes to participate in the investigative or disciplinary processes once they have commenced. In these situations--and where the underlying conduct is sufficiently serious or poses a threat to other members of the College community--the College reserves the right to step in the shoes of the Complainant and keep the process moving forward.

E. Interim Measures, Remedies & Accommodations

Overview

Upon receipt of a report of Sexual Misconduct, Relationship Violence, or Stalking, the College will impose interim measures when reasonable and appropriate. Interim measures will be considered in every case, although they may not be implemented in every case. Interim measures may be imposed regardless of whether formal resolution/disciplinary action is sought by the Complainant or the College.

A Reporter, Complainant or Respondent may request separation or other protection, or the College may choose to impose interim measures in at its discretion for any or all of the following reasons: to eliminate a hostile environment, to ensure the safety of one or more parties, to preserve the status quo while an investigation commences, to ensure the safety of the broader College community, and/or to protect the integrity of the investigatory and/or disciplinary process.

All individuals are encouraged to report concerns about failure of another individual to abide by any restrictions imposed by an interim measure. The College will take immediate and responsive action to enforce a previously implemented measure.

Range of Interim Measures and Accommodations

Interim measures will be implemented at the discretion of the College when reasonable, appropriate, and possible. Potential remedies and accommodations that may be applied and/or available to the Reporter, Complainant and/or the Respondent include:

As to students:

- Access to counseling services and assistance in setting up initial appointment
- Imposition of a University no-contact directive
- Rescheduling of exams and assignments
- Providing alternative course completion options
- A change in class schedule or transferring sections, including the ability to drop a course without penalty
- A change in student's housing assignment
- Assistance from College staff in completing housing relocation
- Limiting an individual or organization's access to certain College facilities or activities pending resolution of the matter
- Providing an escort to ensure safe movement between classes and activities
- Providing medical services
- Providing academic support services, such as tutoring
- An interim suspension pending the outcome of a conduct hearing
- Any other interim measure or accommodation which can be tailored to the involved individuals to achieve the goals of this Policy

As to employees:

- Access to counseling services and assistance in setting up initial appointment
- A change of office space
- A change in work schedule or job assignment
- Limiting an individual or organization's access to certain College facilities or activities pending resolution of the matter
- A voluntary leave of absence
- Any other interim measure or accommodation which can be tailored to the involved individuals to achieve the goals of this Policy

Interim Suspension or Leave

Where the alleged Sexual Misconduct, Relationship Violence, or Stalking poses an ongoing risk of harm to the safety or well-being of an individual or members of the campus community, the College may place an individual student or an organization on interim suspension pending the outcome of a disciplinary hearing. This means pending resolution of the matter, the individual or organization may be denied access to campus or otherwise stripped of College privileges. During interim suspension, a student, employee or group typically may not continue his/her/hir coursework, duties of employment or other activities unless otherwise noted in the interim suspension letter. When interim suspension or leave is imposed, the College will make reasonable efforts to complete the investigation and hearing (but not appeal), where a hearing is required, within an expedited time frame. Any and all costs associated with the suspension or leave (such as air fare or rent for interim housing) shall be borne by the student.

VI. PROCESS

A. Initiating the Disciplinary Process

As outlined in the Reporting section of these procedures, an individual, whether the alleged victim (Complainant) or not, is encouraged to report an alleged incident of Sexual Misconduct, Relationship Violence, and/or Stalking directly to the College's Deputy Title IX Coordinator or the University's Title IX Coordinator. Reports may also be made to Responsible Employees or Confidential Reporting locations.

The College will maintain fairness for all parties and balance the needs and interests of the individuals involved with the safety of the community as a whole throughout the investigation and resolution process. It is the College's intent to provide prompt, fair and impartial investigations and resolutions of such complaints, conducted by officials who receive annual training on the issues related to domestic violence, dating violence, sexual assault, and stalking and how to conduct an investigation and hearing process that protects the safety of victims and promotes accountability.

B. Specific University Disciplinary Processes

These Procedures apply to all complaints received by the University involving student Respondents.

Complaints against employees of the University or employees of the College will be resolved pursuant to the University's [Procedures for Resolution of Complaints of Sexual Misconduct, Relationship Violence and Stalking](#).

For complaints where the Respondent is an individual unaffiliated with the College, although the College cannot pursue disciplinary action against the Respondent, the College can assist the Complainant in many ways,

including, but not limited to, ensuring the Complainant receives appropriate medical care, interim and remedial measures; coordinating reporting and follow-up with outside law enforcement; and providing support during off-campus procedures.

C. Title IX/VAWA Intake Assessment

In every report of Sexual Misconduct, Relationship Violence, and Stalking, the College, through the coordinated efforts of the Title IX Team (as defined in the Reporting section of these procedures), will conduct a Title IX/VAWA intake assessment.

The purpose of this intake assessment is to determine if the conduct reported, if true, could constitute a violation of this Policy. If it could, the matter should proceed as discussed below. If it could not, the Complainant/Reporter should be notified of same in writing, and the matter closed.

D. Initial Meetings With Parties

Once an Intake Assessment is made, if the matter is to move forward, a member of the Title IX Team shall do the following:

- Meet with the Complainant/Reporter to understand in more detail the allegations;
- Address immediate physical safety and emotional well-being of the parties;
- Assess the nature and circumstances of the allegation(s);
- Notify the Complainant of the range of interim accommodations and remedies available to him/her/hir;
- Notify the Complainant of his/her/hir right to contact law enforcement and seek medical treatment;
- Notify the Complainant of the importance of preservation of evidence;
- Advise the Respondent, in writing, of the nature of the charges against him/her/hir (or, if multiple Respondents, them) and provide the same notice to the Complainant;
- Provide the Respondent with information about pertinent interim measures;
- Provide the Complainant/Respondent with information about on- and off-campus resources, including confidential resources;
- Provide the Complainant/Respondent with an explanation of the procedural options, including Informal Resolution (when appropriate) and Formal Resolution;
- Explain the College's policy prohibiting Retaliation;
- Discuss the Complainant's expressed preference for manner of resolution and any barriers to proceeding;

- Take steps to ensure that, if appropriate, the matter is entered into the University's daily crime log;
- Assess the reported conduct for the need for a timely warning under the Clery Act

After these meetings occur, the Team will meet and determine the appropriate next steps, including implementing any reasonable and appropriate interim measures, conducting any investigative steps, and resolving the complaint formally or informally. With the exception of recordings performed by the College during Judicial Board Hearings, no recordings are permitted during any stage of the Title IX process.

E. Time Frames for Resolution

The College seeks to resolve all reports of Alleged Sexual Misconduct, Relationship Violence, and Stalking within 60 calendar days. All timeframes expressed in these procedures are meant to be guidelines rather than rigid requirements. Extenuating circumstances may arise that require the extension of timeframes, including extension beyond 60 calendar days.

Extenuating circumstances may include, but are not limited to, the complexity of the allegations, the number of witnesses involved, the availability of the parties or witnesses, the effect of a concurrent criminal investigation, any intervening school break or vacation, or other unforeseen circumstances.

In general, a Complainant and Respondent can expect to receive periodic updates as to the status of the review or investigation. In the event that the investigation and resolution exceed the anticipated time frame, the College will notify all parties in writing of the need for additional time, and best efforts will be made to complete the process in a timely manner while balancing principles of thoroughness and fundamental fairness with promptness.

F. Investigation

Once the initial assessment confirms that the matter falls within the scope of these procedures, the College will initiate an investigation, consistent with the section on Requests for Confidentiality. The investigation is designed to provide a fair and reliable gathering of the facts. The investigation will be thorough, impartial, and fair, and all individuals will be treated with appropriate sensitivity and respect.

The College may designate an investigator(s) of its choosing from inside or outside of the University at its discretion. The investigator will be an individual who has specific training and experience (and who receives annual training on) investigating allegations of Sexual Misconduct, Relationship Violence, and Stalking and how to conduct an investigation and hearing process that protects the safety of victims and

promotes accountability. The College will typically designate a Deputy Title IX Coordinator to conduct an investigation. The College may also choose to engage an external investigator at its discretion.

The College will seek to conduct the investigation within forty (40) business days of receiving the complaint. This time may be extended depending on the complexity of the circumstances of each case.

The investigator will coordinate and conduct fact gathering from the Complainant, the Reporter (if different from the Complainant), the Respondent, and any other individuals who may have information relevant to the determination. The investigator will also gather any available physical or medical evidence, including documents, communications between the parties, and other electronic records as appropriate. The first step of an investigation will usually be an interview of the Complainant. The interview of the Complainant will generally inform next steps.

During the investigation, the Respondent shall have the opportunity to understand the charges against him/her/hir, and respond in writing, and shall have the right to have an advisor of his/her/hir choice (as discussed below) present at any meeting. Similarly, the Complainant shall have the opportunity to understand the Respondent's response, and reply in writing, and to have an advisor of his/her/hir choice present at any meeting. If determined to be appropriate in the sole discretion of the investigator, underlying documents, redacted as appropriate, may be shown to the Complainant or Respondent to help them understand the charges/response.

After the investigation is complete, the investigator shall create an investigation report that will contain the following information:

- Name of Complainant(s)
- Name of Reporter (if different)
- Name of Respondent(s)
- Policy Provisions Alleged to Have Been Violated
- Chronology of interviews, with brief note on investigator's assessment of credibility of each witness
- Summary of the incident
- Summary of key documents and material reviewed

G. Grievance Procedures Applicable to Student-Respondents

1. Advisors

In all disciplinary meetings, including hearings, the Complainant and Respondent both have the right to be assisted by an advisor of his/her/hir choice. The Dean of Students can provide a list of trained advisors who can guide the Complainant(s) and Respondent(s) through the pre-hearing and hearing process.

The advisor may accompany a Complainant or Respondent to any meeting during the disciplinary process with a University employee or investigator, and to the hearing. The role of the advisor is to provide support; the advisor may not speak on behalf of the Complainant or Respondent or otherwise directly participate in the investigative process or in the hearing.

Absent extenuating circumstances, witnesses and others involved in an investigation or hearing are not entitled to have an advisor.

2. Types of Resolution Applicable to Complaints

Informal Resolution

Informal Resolution is an educational and remedies-based approach to the resolution of complaints. If the Team determines that Informal Resolution may be appropriate following the initial intake assessment, the College will take immediate and corrective action through individual and community remedies designed to maximize the Complainant's access to the educational, programs and activities at the College.

Examples of potential remedies are provided in the section of these procedures titled Interim Measures, Remedies, and Accommodations. Other potential remedies include targeted or broad-based educational programming or training.

In cases that do not involve Sexual Violence, mediation and other restorative justice options may be an appropriate form of informal resolution. Mediation is never appropriate in a case involving Sexual Violence, nor in a Dating Violence, Domestic Violence or Stalking case with a Sexually Violent component to it.

The decision to pursue informal resolution may be made before, during or after a full factual investigation by the College.

Formal Resolution

Formal Resolution is a judicial, sanctions-based process that may involve discipline and remedial action. Formal Resolution of a report under the Policy may occur through the use of an Administrative Hearing or a Judicial Board Hearing.

The Vice President of the College (or designee) has discretion to determine which Formal Resolution model is more appropriate, factoring in the parties' requests for resolution through an Administrative Hearing or a Judicial Board Hearing. In determining which method of resolution is appropriate, the Vice President may consult with the Title IX Coordinator as necessary.

3. Next Steps After Investigation

At the conclusion of the investigation, the Vice President (or designee) will review the investigation report. If, based on the facts gathered in the investigation report, including assessments of credibility, no reasonable person could determine that there was a Policy violation, the Vice President (or designee) shall make this determination and advise both parties in writing.

If the Vice President (or designee) determines that a violation of Policy could plausibly have occurred based on the investigation report, he or she shall then determine whether Informal Resolution is appropriate given the nature of the conduct discovered. If so, the Vice President (or designee) shall offer Informal Resolution to both parties, and if both parties agree, the matter shall be resolved through Informal Resolution.

If the Vice President (or designee) determines that a violation of Policy could plausibly have occurred and Informal Resolution is not appropriate, the matter shall move forward toward Formal Resolution. If the Complainant does not wish to participate in Formal Resolution, the College may, in its discretion, step in the shoes of the Complainant and proceed as the Complainant for purposes of Formal Resolution.

4. Prehearing Procedures for Formal Resolution

Prehearing Meetings with Complainant and Respondent

When formal resolution is deemed necessary based on the review of the investigation report, the Vice President of the College (or designee) will contact the Complainant and Respondent to schedule meetings with each party individually.

At this pre-hearing meeting, the Deputy Title IX Coordinator and/or Vice President of the College (or designee) will meet with each party. During the meeting, the party will receive an explanation of the

hearing process and have the opportunity to ask any questions before the hearing occurs. If the Complainant and/or Respondent have elected to have advisors throughout the hearing process, the advisor is encouraged to accompany the Complainant/ Respondent to this initial meeting.

Notice of Hearing

Once each party has met with the Vice President of the College (or designee), the Vice President of the College (or designee) will send a Notice of Hearing to the Complainant and the Respondent. The Notice of Hearing provides each party with a statement of the policy violation(s) that are alleged to have taken place and a summary of the facts underlying the allegations. In addition, the Notice provides the parties with the date, time, and place of the hearing. All parties will be informed of the name(s) of the person(s) hearing the case at least seven (7) business days prior to the hearing, and they shall have 48 hours thereafter to object to any of the hearing personnel on the basis of an alleged bias or conflict.

In general, the hearing will be scheduled approximately three weeks after the Notice of Hearing is sent. Under extenuating circumstances, this timeframe may be extended by the Vice President of the College (or designee).

Pre-Hearing Review of Documents

The Complainant and the Respondent will each have the opportunity to review the investigation report, redacted as appropriate, at least ten (10) business days prior to the hearing.

Relevance of Evidence

The Vice President of the College (or designee), in conjunction with the University Title IX Coordinator, has sole discretion to determine whether any proffered information or witness is relevant and material to the determination of responsibility given the nature of the allegation. In general, the Vice President of the College (or designee) and Title IX Coordinator may reject or redact information that is irrelevant, more prejudicial than probative, or immaterial. The Vice President of the College (or designee) and Title IX Coordinator may also redact statements of personal opinion, rather than direct observations or reasonable inferences from the facts, and statements as to general reputation for any character trait, including honesty. Moreover, cumulative “character witness” testimony is generally not relevant in these matters.

Prior Sexual History and/or Pattern Evidence

Advance permission must be sought by either party seeking to bring forth information concerning the other party's prior sexual history, pattern evidence, evidence of similar conduct, or a prior finding of responsibility as to sexual misconduct or dishonesty related to accusations of sexual misconduct. Such requests must be submitted during the investigative phase, unless the information was not previously known to the parties. The Vice President of the College (or designee) and Title IX Coordinator (or designee) will judge the admissibility of such information.

Request to Reschedule Hearing

Either party can request to have a hearing rescheduled for good cause. Absent extenuating circumstances, requests to reschedule must be submitted to the Vice President of the College (or designee) at least five (5) business days prior to the hearing. The Vice President of the College (or designee) shall be the sole authority for determining whether good cause exists to reschedule the hearing.

Consolidation of Hearings

The Vice President of the College (or designee), in his/her discretion, may consolidate multiple reports against a Respondent into one hearing, if the evidence related to each incident would be relevant and probative in reaching a determination on the other incident. Matters may be consolidated where they involve multiple Complainants, multiple Respondents, or related conduct, which would regularly have been heard under the Student Handbook.

Safeguarding of Privacy

All parties involved in a hearing are required to keep the information learned in preparation for the hearing and at the hearing private. No copies of any materials distributed at the hearing are to be made or shared with any third parties. All materials provided at the hearing must be returned to the Vice President of the College (or designee) at the conclusion of the hearing. Any breach of this duty is subject to further disciplinary action by the College.

5. Types of Hearings That May Be Applicable to Complaints of Sexual Misconduct, Relationship Violence, and Stalking

Administrative Hearing

An Administrative Hearing is appropriate only when both parties and the Vice President (or designee) agree to a resolution by an Administrative Hearing. Depending upon the nature and severity of the

allegations, the Vice President (or designee) may decline to handle the matter administratively and refer the case to a Judicial Board Hearing. An Administrative Hearing is particularly appropriate when the Respondent has admitted to the conduct and there is no discernible dispute in the relevant facts of the investigation report. The Vice President (or designee) may also find an Administrative Hearing appropriate when the facts are in dispute.

In an Administrative Hearing, the Vice President (or designee) will meet with both parties. In preparation of the Hearing, both parties will have Notice of the Hearing and the opportunity to review the investigative report. At the time of the Administrative Hearing, the parties will each have the opportunity to present relevant information to the Vice President (or designee) who will determine responsibility and a sanction, if appropriate.

In reaching a decision as to whether the Policy has been violated, the Vice President (or designee) will reach a determination by a preponderance of the evidence. Under the preponderance of the evidence standard, the Vice President (or designee) will determine whether the conduct was “more likely than not” to have occurred as alleged. In reaching a determination of responsibility, the Vice President (or designee) will use the investigative report as the primary evidence.

After the Vice President (or designee) renders a decision, the Vice President (or designee) will issue an appropriate sanction, if applicable. The Vice President (or designee) in consultation with the Title IX Coordinator, will also implement any appropriate and reasonable remedial measures as outlined in the section of the Policy titled Interim Measures, Remedies, and Accommodations section. Both a Complainant and Respondent may appeal the determination of the Vice President (or designee) as provided in the Appeal section below.

Judicial Board Hearing

The Judicial Board is a fact-finding hearing board consisting of College staff, trained in student conduct procedures. Judicial Board members are trained at least annually in the dynamics of Sexual Misconduct, Relationship Violence, and Stalking, the factors relevant to a determination of credibility, the appropriate manner in which to receive and evaluate sensitive information, the appropriate manner of deliberation, and the application of the preponderance of the evidence standard, as well as the College’s policies and procedures.

Consistent with privacy considerations, the College will inquire with each prospective Judicial Board member whether they believe they can be fair and impartial in a hearing. Additionally, as noted above, the Complainant and/or the Respondent may ask in writing that a member of the Board be removed if

there are reasonable, articulable grounds to suspect bias, a conflict of interest, or an inability to be fair and impartial. In addition, the College will take into consideration any other reasonable factor, including, whether the party/ies have had significant interaction with a certain Board member or the likelihood that a student-party will have significant interaction with a certain Board member.

Failure to object prior to the hearing will forfeit one's ability to appeal the outcome based on alleged bias or conflict.

If a hearing must be held at or after the end of the semester and a full Judicial Board cannot reasonably be convened, the hearing may be heard by a modified composition of the Judicial Board. The Complainant and the Respondent will be asked to sign a waiver exempting Judicial Board composition as grounds for appeal. Alternatively, the hearing may be deferred until a full Judicial Board is available or when the academic calendar is commenced.

Identification of Witnesses

The Complainant, Respondent, and Judicial Board members all have the right to call witnesses at the hearing. Witnesses must have observed the acts in question or have information relevant to the incident and cannot participate solely to speak about an individual's character.

In general, neither party will be permitted to call as a witness anyone who was not interviewed by the investigator as part of the College's investigation. If either party wishes to call witnesses, whether or not they were previously interviewed as part of the College's investigation, the following must be submitted no later than ten (10) business days before the hearing to the Vice President of the College (or designee) via email:

- The names of any witnesses that the party intends to call;
- A written statement and/or description of what each witness observed, if not already provided during investigation;
- A summary of why the witness' presence is relevant to making a decision about responsibility at the hearing; and,
- The reason why the witness was not interviewed by the investigator, if applicable and known.

The Title IX Coordinator and/or Vice President of the College has sole discretion to determine if the proffered witness(es) have relevant information and if there is sufficient justification for permitting a witness who was not interviewed by the investigator. The Title IX Coordinator and/or Vice President of the College may also require the investigator to interview the newly proffered witness(es). The

College will make every attempt to complete any further investigation in an expedited manner. However, if new information or requests for witnesses are presented, further investigation may cause delay in the hearing process.

If witnesses are approved to be present, the Respondent and Complainant will be provided with a list of witnesses and any relevant documents related to their appearance at the hearing no later than five (5) business days before the hearing.

Attendance at Hearing

If a party does not attend a hearing, for any non-emergency or un-compelling reason, the hearing may be held in his/her/hir absence at the discretion of the Vice President of the College (or designee). If a student chooses to withdraw or take a leave from the College prior to the conclusion of an investigation and/or formal resolution under this Policy, the College will move forward with the hearing and imposition of educational outcomes, if any, in absentia.

Alternative Presence Options

In order to facilitate the prompt and equitable resolution of complaints, the College may elect to use telephonic, videoconferencing or other technology to conduct any or all initial and pre-hearing meetings, interviews and other portions of the investigation, and the hearing itself.

In addition, a Complainant or Respondent may request participation by other suitable means that would not require physical proximity to the other party during the hearing. This can include, but is not limited to, partitioning a hearing room or using technology to facilitate participation. Any proposed alternative must be reviewed in advance to ensure that it is consistent with the goals of a fair and equitable process. The request would be made to the Vice President of the College (or designated presiding officer).

Participants in Hearing Procedures

The Judicial Board is a closed hearing; it is not open to the public. The individuals from the College community who may appear before the Judicial Board are: the Complainant, the Respondent, any individuals serving as advisors, the Investigator, and any individuals who appear as witnesses. Moreover, the Title IX Coordinator and Vice President of the College may attend any hearing.

Hearing Procedures

While there may be disciplinary sanctions and remedies imposed following a formal resolution, a hearing is not intended to be adversarial. It is intended to be educational, corrective, and developmental.

The hearing is intended to provide fair and ample opportunity for each side to present his/her/hir version of events and for the Judicial Board to determine the facts of the case, make a determination regarding the alleged violations of this Policy, and to recommend appropriate sanctions and remedies, if necessary. The hearing is an informal proceeding not comparable to a criminal trial. The College utilizes the resolution process to assess and, as appropriate, take disciplinary action and implement appropriate remedies regarding a violation of College policy or regulation.

The Judicial Board will review all available and pertinent information regarding the incident in question. Relevant information supporting the alleged violation(s) may be offered in the form of written statements, the investigation report, documents, items, and/or oral information from the Complainant, the Respondents, Investigator(s) and witnesses.

A hearing will be called to order by the Vice President of the College (or designee). The hearing will have a Judicial Board Chair, who will serve as a non-voting presiding member and as an adviser to the Board.

The Judicial Board Chair will explain the hearing process and will provide an opportunity to all parties to ask procedural questions prior to initial statements and the presentation of information.

The Investigator will provide a brief opening statement summarizing the investigation. The opening statement should focus on the areas of agreement and disagreement in order to assist the Judicial Board in prioritizing areas of inquiry. The Judicial Board, Complainant, and/or Respondent may make brief inquiries of the Investigator at this juncture, and there will be additional opportunity to ask questions of the Investigator after the Judicial Board has heard from the Complainant, the Respondent, and any witnesses.

The Complainant will be given an opportunity to present an opening statement. The Complainant is encouraged to and may present his/her/hir own account of the events in a narrative format. The Judicial Board may pose questions to the Complainant. The Respondent is encouraged to compile a written list of questions that he/she/zi would like to pose to the Complainant. The list will be provided to the Judicial Board Chair, who will determine the relevance of the questions and ask the Complainant those questions deemed relevant and appropriate. The Respondent will not directly question or address, directly or indirectly, the Complainant.

After the Complainant is finished, the Respondent will be given an opportunity to present an opening statement. The Respondent is encouraged to and may present his/her/hir own account of the events in narrative format. The Judicial Board may pose questions to the Respondent. The Complainant is

encouraged to compile a written list of questions that he/she/zi would like to pose to the Respondent. The list will be provided to the Judicial Board Chair, who will determine the relevance of the questions and ask the Respondent those questions deemed relevant and appropriate. The Complainant will not directly question or address, directly or indirectly, the Respondent.

Witnesses on behalf of the Complainant and the Respondent may then be proffered. Each witness will be asked to give a narrative account. Each witness will then be questioned by the Judicial Board, the Complainant, and the Respondent. Under some circumstances, *e.g.* complaints involving allegations of sexual violence, the Complainant or Respondent may be asked to present a list of written questions to the Judicial Board Chair, who will determine the relevance of the questions and pose any questions deemed relevant.

The Judicial Board, Complainant, and Respondent may then question the Investigator. At the conclusion of the presentation of all witnesses and the Investigator, the Complainant and the Respondent will each be given the opportunity to give a brief closing statement.

Questioning of Witnesses

It is the responsibility of the Judicial Board to ensure that the information necessary to make an informed decision is presented. Judicial Board members may play an active role in questioning both parties and witnesses involved in the case. Judicial Board members are under no obligation to allow either party to directly question witnesses. As outlined above, the parties may submit questions to the Judicial Board in writing, which may be posed at the discretion of the Board.

Parties and other individuals who offer information at a hearing are expected to respond honestly and to the best of their knowledge. The Judicial Board reserves the right to recall any party or witness for further questions and to seek additional information necessary to make a decision.

Recording of Proceedings

Board proceedings are digitally audio-recorded, but the deliberations of the Judicial Board are not. The digital audio recording is created for two limited purposes only: for reference by the Judicial Board and/or Judicial Board Chair during deliberations and for review by an appeals designee during an appeal. No other recordings are permitted during any other stage of the Title IX process and no other access to the recordings is permitted. Absent extraordinary circumstances, the recording is destroyed after all appeals have been exhausted, at which point the case is closed.

Deliberation

After all of the information has been presented, all parties will be dismissed from the hearing room so that the Judicial Board may deliberate in private. The Judicial Board Chair may remain for deliberations but may not vote for finding(s) of responsibility and/or educational outcome(s) – unless there is a tie. The Judicial Board must reach a decision on responsibility by majority vote and by using the preponderance (“more likely than not”) standard when reviewing findings of fact. Only the decision on responsibility will be shared with the Complainant and the Respondent. The vote itself shall not be shared with the parties.

The findings of the Judicial Board will be reduced to writing in a case opinion. The findings will detail the findings of fact and the basis/rationale for the decision of the Judicial Board, making reference to the evidence that led to the finding.

Preponderance of the Evidence

The Judicial Board will determine a Respondent’s responsibility by a preponderance of the evidence. This means that the Judicial Board will decide whether it is “more likely than not,” based upon the information provided at the hearing, that the Respondent is responsible for the alleged violation(s).

6. Sanctions and Remedies

The Complainant and Respondent will each have the opportunity to present a written statement about the impact this incident (as well as conduct proceedings) has had on him/her/hir and/or requested sanctions and remedies.

These statements will be reviewed by the Judicial Board only if the Respondent is found responsible. A Judicial Board that finds a student or student group/organization responsible for a violation of the Policy may recommend appropriate sanctions and remedies to the Vice President of the College (or designee).

The Vice President of the College (or designee) is not bound by the recommendations of the Judicial Board and has the final authority to impose appropriate sanctions and remedies. A violation of the Policy may result in suspension or dismissal. Sanctions may range from written warning to permanent separation (i.e., dismissal) from the College. They may also include educational, remedial, and/or disciplinary action as warranted. In general:

- Any student who is determined to have engaged in Non-consensual Sexual Intercourse may receive educational outcomes ranging from suspension to dismissal;
- Any student who is determined to have engaged in Non-consensual Sexual Contact (where no intercourse has occurred) may receive educational outcomes ranging from conduct warning to dismissal.
- Any student who is determined to have engaged in any other prohibited form of conduct may receive educational outcomes ranging from conduct warning to dismissal.

The Judicial Board and Vice President of the College (or designee) or Title IX Coordinator reserve the right to broaden or lessen any range of recommended sanction and/or remedy in the case of serious mitigating circumstances or egregiously offensive behavior. Neither the Judicial Board, Vice President of the College (or designee), nor any appeals officer will deviate from the range of recommended outcomes unless compelling justification exists to do so.

Sanctions and remedies may be issued individually, or a combination of outcomes may be imposed. The determination of sanctions and remedies is based upon a number of factors, including but not limited to:

- The severity of the incident;
- The impact on the Complainant;
- Any ongoing risk to either the Complainant or the community posed by Respondent;
- The impact of the violation on the community, its members, or its property;
- Any previous conduct violations; and
- Any mitigating or aggravating circumstances.

7. Notice of Outcome

The Vice President of the College (or designee) will communicate the result of the hearing simultaneously to the Respondent and the Complainant in writing, as well as the procedures to appeal the results of the proceeding. The outcome will also be communicated to the Title IX Coordinator and Deputy Title IX Coordinator for the College. Generally, the outcome of the hearing will be final and communicated to the parties within three (3) business days from the date the hearing is concluded.

The Respondent will be informed of any sanctions and remedies if found responsible, the date by which the requirements must be satisfied (if applicable), and the consequences of failure to satisfy the sanction and/or remedy. The Complainant will be informed of any outcomes that directly relate to him/her/hir.

The imposition of sanctions and remedies will take effect immediately and will not be postponed pending the resolution of the appeal.

8. Appeals

Either party may appeal the determination of responsibility from a Formal Resolution in writing under certain grounds. The appeal must be filed by electronic copy to the University Title IX Coordinator within five (5) business days of receiving the written Notice of Outcome.

The Title IX Coordinator will assign the appeal to the University Provost (or his/her designee), who will act as Appellate Officer. The Appellate Officer will impartially evaluate the appeal and will not have previously investigated the case or served on the Judicial Board in the case.

The Complainant and/or Respondent may appeal only the parts of the determination of responsibility directly relating to him or her. Dissatisfaction with the outcome of the hearing is not grounds for appeal.

The only grounds for appeal are:

- New evidence that was not available at the time of the original adjudication or investigation that could significantly impact the outcome of the original adjudication; and/or,
- A substantive or procedural error(s) occurred at the time of the adjudication that had a material impact on the outcome of the adjudication.

The appeal shall consist of a plain, concise, and complete written statement outlining the ground(s) for the appeal and all relevant information to substantiate the basis for the appeal. When an appeal has been submitted, the Title IX Coordinator will notify both parties. The non-appealing party will then be given the opportunity to provide a written response to the appeal. Any response by the opposing party must be submitted within five (5) business days from receipt of the appeal.

In any request for an appeal, the burden of proof lies with the appealing party. An appeal is a deferential review of the Formal Resolution. It is not an opportunity for the Appellate Officer to substitute its judgment for that of the adjudicator(s). In reviewing an appeal, the Appellate Officer will consider the merits of the appeal only on the basis of the two grounds for appeal and the supporting information provided in the written request for appeal along with the recording of the original hearing. The Appellate Officer can:

- Affirm the decision of the original adjudication, denying the appeal;

- Grant the appeal and alter the findings, and/or alter the educational outcomes, depending on the basis of the requested appeal. If the Appellate Officer deems that procedures were not followed in a material manner, the Appellate Officer can ask that a new hearing occur before a new Appellate Officer, designated by the Appellate Officer from the Office of the Provost; or
- Grant the appeal because of new evidence, the Appellate Officer can recommend that the case be returned to the original Judicial Board or Administrative Hearing to assess the weight and effect of the new evidence and render a determination after considering the new evidence, or, in certain circumstances, assigned to an investigator for a new investigation.

The Title IX Coordinator will communicate the Appellate Officer's decision on the appeal, any change to the results that occurs prior to the time that such results become final and when such results become final, simultaneously to both the Complainant and Respondent within ten (10) business days from the date of the submission of all appeal documents by both parties. Appeal decisions are final.

9. Records

Affirmative findings of responsibility in matters resolved by means of formal resolution are part of a student's conduct record. Such records shall be used in reviewing any further misconduct or developing educational outcomes and shall remain a part of a student's conduct record. Generally, dismissals are permanently noted on a student's transcript. Suspensions and withdrawal pending disciplinary action are removed from a student's transcript after the student successfully completes one semester upon his/her/hir return with no further incident. The conduct files of students who have been suspended or dismissed from the University are permanently maintained in the office of the College's Director of Student Life and Support Services. Conduct files of students who have not been suspended or dismissed are maintained for a period of five years after the student's graduation.

Student conduct records may be released to College and University officials on a "need-to-know" basis. Records may be released to persons and agencies external to the University with the student's permission, or in compliance with the law (FERPA). Records that are lawfully subpoenaed or ordered by a judge may be released without the student's permission. A student's conduct record may also be released if it is in connection with a health and/or safety emergency. To the extent possible and permissible by law, the University will strive to protect the confidentiality of identifying information about students.

Further questions about student conduct record retention should be directed to the Director of Student Life and Support Services.

Non-Discrimination Statement

Arcadia University is committed to providing a safe and non-discriminatory education environment for all community members. Arcadia University does not discriminate in matters of admissions, employment, and housing, and in access to and participation in its education programs, services, or activities. The University does not discriminate on the basis of race, color, national origin, ethnicity, age, religion, sex, gender identity or expression, sexual orientation, pregnancy, marital status, veteran status, disability, or any other protected class. Discrimination and harassment on any of these bases covered by federal anti-discrimination statutes is unlawful and a violation of Arcadia University policy.

The policy addresses all forms of sexual harassment, violence, sexual assault, intimate partner violence, domestic violence, dating violence, and stalking. Arcadia University does not discriminate on the basis of sex in its educational, extra or co-curricular, athletic, or other programs or in context of employment. Sex discrimination is prohibited by Title IX. Sexual harassment and sexual misconduct as defined in this policy are forms of sex discrimination prohibited by Title IX of the Education Amendments of 1972, a federal civil rights law that provides:

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

Sexual harassment is also prohibited under the Title VII of the Civil Rights Act of 1964 and other applicable statutes.

The policy is consistent with the relevant governmental statutes and regulation, such as Titles VI and VII of the Civil Rights Act of 1964, Title IX of the Education Amendments of 1972, The Age Discriminations in Employment Act, The Americans with Disabilities Act and ADA Amendments Act, The Equal Pay Act, The Uniform Services Employment and Reemployment Rights Act, The Pennsylvania Human Relations Act, and the Cheltenham Township Anti-Discrimination Ordinance.

Inquiries or complaints about the application of Title IX may be directed to the University's Title IX Coordinator and/or to the United States Department of Education Office of Civil Rights:

Arcadia University

Nora Nelle

Title IX Coordinator

450 S. Easton Road

Glenside, PA 19038-3295

(215) 517-2659
nellen@arcadia.edu

Arcadia University

The College of Global Studies

Tim Barton, Title IX Investigator
450 S. Easton Road
Glenside, PA 19038-3295
(267)218-1488
bartont@arcadia.edu

Office of Civil Rights

U.S. Department of Education

100 Penn Square East, Suite 515
Philadelphia, PA 19107-3233
(215) 656-8541
(215) 686-8506 (fax)
OCR.Philadelphia@ed.gov

General Grievance Procedures for Cases of Discrimination or Harassment

The College of Global Studies students who feel they have experienced discrimination, disciplinary action, or harassment based upon ethnicity, national origin, ancestry, race, color, religion, creed, sex, marital status, affectional or sexual orientation, age, or disability have rights to grievance procedures which should both address their complaints and see that misbehavior is penalized or errant practices corrected. It is desirable that complaints about mistreatment be resolved through informal channels if at all possible. Informal procedures involve mutually agreed upon resolutions. A formal grievance mechanism exists for those complainants who feel that informal discussions cannot resolve a problem or for whom other channels are inappropriate or unavailable. Formal procedures involve a hearing to adjudicate the violations. The hearings are conducted by the Resident Director or a designated member of the Arcadia University and/or The College of Global Studies staff and/or the Vice President of The College of Global Studies at Arcadia University. In either the informal or formal hearings, the accused and the accuser need not be present at the same time as determined by the designated Hearing Officer. (Except in the case of a Title IX adjudication where complainant and respondent may be in proximity of each other.)

The Clery Act

The College of Global Studies as a constituent unit of Arcadia University provides statistics from our program locations to Arcadia's Public Safety Department for inclusion in Arcadia's Annual Security and Fire Safety report as required by the United States Department of Education and to the State of Pennsylvania.

The Jeanne Clery Disclosure of Campus Security Policy and Crime Statistics Act requires Arcadia University to provide students and employees with information on its security policies and procedures and specific statistics for certain criminal incidents, arrests and disciplinary referrals and to make the information and statistics available to prospective students and employees upon request. This information is available in the Annual Security and Fire Safety Report or by calling the Department of Public Safety of Arcadia University at 215-572-2800.

The crime statistics reported under the Jeanne Clery Act include the following:

- Criminal Homicide;
 - Murder and nonnegligent manslaughter;
 - Negligent manslaughter;
- Sex Offenses, including rape, fondling, incest, and statutory rape;
- Robbery;
- Aggravated Assault;
- Burglary;
- Motor Vehicle Theft;
- Arson;
- Dating violence;
- Domestic violence;
- Stalking;
- Arrests and referrals for disciplinary action, including arrests for liquor law violations, drug law violations, and illegal weapons possession;
- Hate Crimes: The law requires the release of statistics by category of bias concerning the occurrence of hate crimes in the crime classifications listed above, as well as the number of the following crimes that are determined to be hate crimes: larceny-theft, simple assault, intimidation, destruction/damage/vandalism of property. The categories of bias include the

victim's actual or perceived race, gender, gender identity, religion, sexual orientation, ethnicity, national origin, or disability.