

**2023 Public Description of Work for  
Action Collaborative on Preventing Sexual Harassment in  
Higher Education**

**Northwestern University**

**Develop additional processes to address Sexual Harassment  
and Sexual Misconduct**

**Relevant Rubric Area(s):**

- Improved Policies
- Trauma-informed programs and practices
- Implementing Restorative or Transformative Justice and Alternative Means of Resolutions

**Description of Work:**

Prior to the start of the 2023-2024 academic year, the Northwestern University Office of Civil Rights and Title IX Compliance (OCR), formerly the Office of Equity, conducted a thorough review of the University's policies regarding discrimination, harassment, and sexual misconduct. OCR engaged stakeholders from the Office of General Counsel, Human Resources, Provost Office, Compliance and Risk, Students Affairs (including the Office of Community Standards, Dean of Students, and Center for Awareness, Response, and Education), and Office of the President for feedback on the implementation of the University's *Policy on Institutional Equity* and *Interim Title IX Sexual Harassment Policy*. In engaging these stakeholders, OCR identified areas of improvement related to the response to reports of sexual harassment and sexual misconduct. Namely, stakeholders identified the lack of alternative resolution mechanisms and the need for response to reports when a specific individual was not identified as a "Respondent."

Prior to the 2023-2024 academic year, the only form of alternative resolution available was restorative resolution; however, due to staffing changes, OCR had yet to develop robust restorative resolution processes. OCR conducted a benchmark analysis of peer institutions' processes for alternative resolution. As described more fully in the [2023-2024 Policy on Discrimination, Harassment, and Sexual Misconduct](#) and the [2023-2024 Interim Title IX Sexual Harassment Policy](#), the University implemented a broad policy for alternative resolution, providing multiple forms of alternative resolution, including facilitated conversations/dialogue and shuttle negotiation. Since implementing alternative resolution, OCR has referred two pending investigations to alternative resolution.

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In discussion with the Office of Human Resources, OCR identified a specific need to address conduct that may implicate the University's policies regarding discrimination, harassment, and sexual misconduct but when a formal resolution is not desired by the person who may have experienced the misconduct, when there is not enough information to proceed with a formal resolution against a known Respondent or where OCR deems it an appropriate response. OCR considers factors outlined in the policy to determine whether an administrative review is appropriate. Upon initiation of an administrative review, OCR will provide notice to the head of the department, unit or area and relevant HR professionals of the commencement of the review and the scope of such review. An administrative review may include interviewing witnesses and gathering evidence. OCR produces a written report outlining the findings and recommendations and provides such report to the executive responsible for the department, unit, or area.

### **Plans for Evaluation:**

In the coming year, OCR will develop quantitative and qualitative measures to evaluate the implementation of alternative resolution and administrative review. OCR will report to the University community on implementation of these measures in its annual report.

### **Next step for the work:**

The University plans to offer more training on alternative resolution to OCR staff, including Civil Rights and Title IX Specialists and Case Managers, to increase staff trained to conduct alternative resolutions. OCR is working with the Office of Global Marketing and Communication to develop a resource guide on alternative resolution to publicize the availability of this form of resolution and answer frequently asked questions.

**Website for further information (if applicable):** [www.northwestern.edu/civil-rights-office](http://www.northwestern.edu/civil-rights-office)

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