

Curry College
2026 Edition
Annual Security Report and Fire Safety Report



Statistics for Calendar Years 2023, 2024, & 2025

1071 Blue Hill Avenue, Milton MA, 02186

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About the College

Curry College

A four-year, residential, private, liberal arts-based, coeducational, degree-granting institution offering undergraduate, graduate, and continuing education programs; founded in 1879 by Anna Baright Curry and Samuel Silas Curry as the School of Elocution and Expression; focused on helping students understand their unique abilities, talents, and interests as they seek and achieve excellence, and successfully take their place in the world.

Location

The main campus is in Milton, Massachusetts; a small community of nearly 27,000 within the Greater Boston metro; ranked #2 in Money Magazine's 2011 Best Places to Live. Nestled on 131-acres, the wooded New England residential campus is just seven miles from downtown Boston, known as the "ultimate college town" and serving approximately 250,000 students. The campus is a few miles away from shuttle-to-subway route and major historic sites, legendary sports venues, shops, restaurants, orchestras, entertainment, cultural events, art galleries, and museums. It is also close to the Blue Hills Nature Reservation with skiing and hiking trails, horseback riding, environmental education, and recreation.

In late 2025 Curry College ceased operations of our satellite campus in Plymouth. Curry College's Plymouth Campus was located at 36 Cordage Park Circle, suite #201A, 201B, 201C, and 201D in the Town of Plymouth Massachusetts. This campus was dedicated to Continuing Education and Graduate Studies students. The building is owned by Cordage Commerce Center, J.D. Cordage, 10 Cordage Park Circle Suite #235. Plymouth MA, 02360 and is leased to the College. The building is shared with other tenants.

Academic Programs

25 undergraduate majors and 65+ minors and concentrations, with pre-professional preparation; five graduate programs in Accounting, Business Administration, Criminal Justice, Education, and Nursing; graduate certificates: and a variety of Continuing Education offerings.

Degrees and Certificates

- Undergraduate: Bachelor of Arts (B.A.), Bachelor of Science (B.S.)
- Graduate: Master of Arts in Criminal Justice (M.A.C.J.); Master of Business Administration (M.B.A.); Master of Education (M.Ed.); Master of Science in Nursing (M.S.N.) Master of Science in Accounting (M.S.A.), Certificate of Advanced Graduate Studies in Education Leadership (C.A.G.S.)
- Continuing education and graduate certificate programs

Enrollment

Nearly 1600 full-time, traditional undergraduates; nearly 250 continuing educations; and nearly 200 graduate students as of the Fall 2023 semester. Approximately 70 percent of our undergraduates live on campus.

Faculty

276 full- and part-time faculty members with a primary focus on teaching; approximately 82 percent of full-time faculty hold a Ph.D. or the terminal degree in their field; student/faculty ratio of 12:1.

Campus Community

Wide range of welcoming groups and exciting activities to engage the entire campus community, including 30 student clubs and organizations, Student Government Association (SGA), Student Entertainment and Events (SEE).

All-campus programming groups.

- ***Intramurals and recreation***
Rugby, Step and Dance Club, cheerleading; nine outdoor tennis courts, cross-country running and fitness trail, fields for football, baseball, softball, soccer, lacrosse; indoor facilities for volleyball, basketball, weight training
- ***Arts and media***
Theatre, chorale; WMLN-FM 91.5 campus radio, CC8 campus television; Currier Times student newspaper, Curry Arts Journal, Amethyst yearbook
- ***Service***
Multicultural Student Union, International Club, ONE Curry, Curry Cares, and extensive community service opportunities
- ***Life and health***
Office of Spiritual Life, chapel; counseling services, health services
- ***Special programs and support***
Advising and Academic Success, Center for Global & Career Services, Office of Disability Services, PAL (Program for Advancement of Learning)
- ***Facilities***
Levin Memorial Library; dynamic, contemporary Student Center with Dining Marketplace and sports café, Katz Gymnasium, fitness center, group exercise studio, student lounge with fireplace and Bookstore; Learning Commons featuring the Science and Research Center.

Athletics

NCAA (National Collegiate Athletics Association) Division III; New England Football Conference, The Commonwealth Coast Conference (TCCC), Eastern College Athletic Conference (ECAC)

Accreditation

Curry College is accredited by the New England Commission of Higher Education (NECHE); a non-governmental, nationally recognized organization whose affiliated institutions include collegiate institutions offering post-graduate instruction throughout New England and beyond.

Curry College's undergraduate and graduate nursing programs are accredited by the Commission on Collegiate Nursing Education (CCNE).

Curry College's undergraduate Business programs and MBA (Master of Business Administration) programs are accredited by the International Accreditation Council for Business Education (IACBE).



What is the Clery Act?

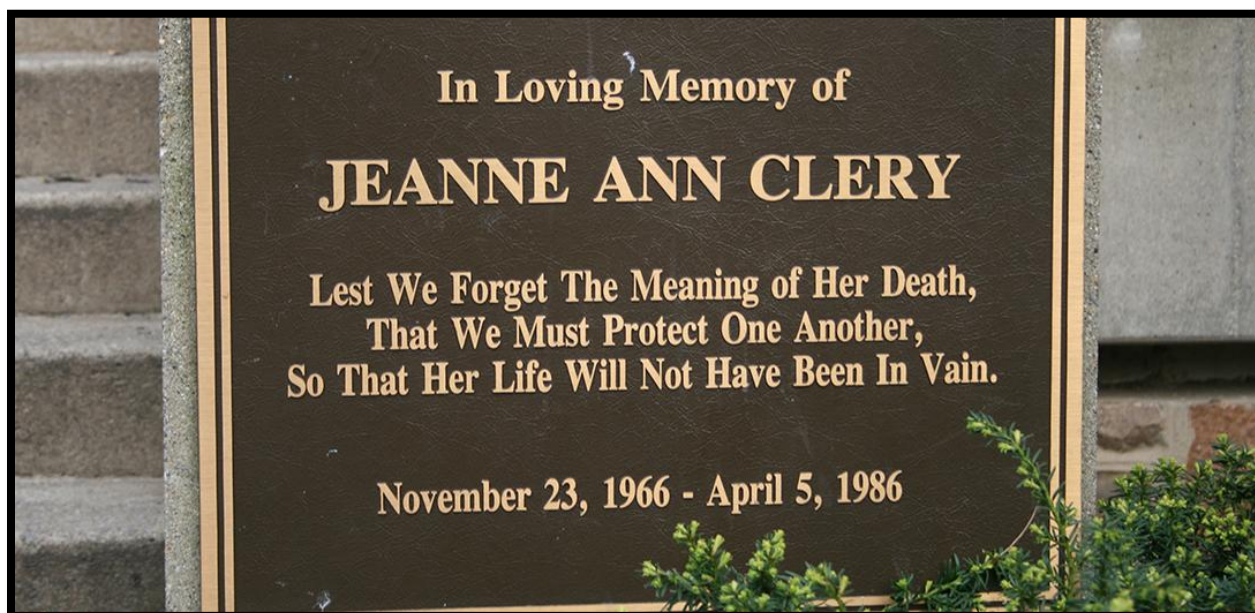
On page one of The U.S. Department of Education's "The Handbook for Campus Safety and Security Reporting 2016 Edition" it states the following regarding the history of the Clery Act:

"In 1990, Congress enacted the Crime Awareness and Campus Security Act of 1990 (Title II of Public Law 101-542), which amended the Higher Education Act of 1965 (HEA). This act required all postsecondary institutions participating in HEA's Title IV student financial assistance programs to disclose campus crime statistics and security information. The act was amended in 1992, 1998, 2000 and 2008. The 1998 amendments renamed the law the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act in memory of a student who was slain in her dorm room in 1986. It is generally referred to as the Clery Act and is in section 485(f) of the HEA.

On March 7, 2013, the Violence Against Women Reauthorization Act of 2013 (VAWA) (Public Law 113-14) was signed into law. VAWA includes amendments to the Clery Act. These changes require institutions to disclose statistics, policies and programs related to dating violence, domestic violence, sexual assault and stalking, among other changes."

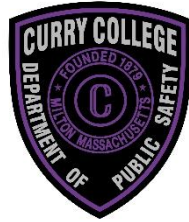
In addition to complying with the requirements of the Clery Act, The Curry College Department of Public Safety in co-ordination with the Title IX Coordinator have prepared this annual Safety and Security Report and Fire Safety Report to help prospective students and their families make informed decisions regarding campus safety. Throughout this document, you will find useful information pertaining to programs, resources, policies, procedures, statistics, and all other related information in relation to campus safety and security at Curry College.

Each Fall an e-mail notification is sent to all enrolled Curry College students and employees and provides the website address to access the Clery Report. Paper copies of the report may be obtained in person at the Department of Public Safety located at 940 Brush Hill Rd. Milton, Ma. You may obtain a copy of the report by calling (617) 333-2222 or by e-mailing patrick.foley@curry.edu.



Curry College Department of Public Safety

Mission Statement



“The Curry College Department of Public Safety’s mission is to provide a safe, secure and inclusive environment for our entire community. This includes all students, faculty, staff, and visitors to our campus. We embrace a community-oriented approach to delivering our services and strive to foster inclusive, deliberate, and strategic partnerships across campus. We encourage our community members to be active participants in the delivery of public safety and operate with an open-door policy for all.”

The Curry College Department of Public Safety is committed to ensuring a safe, secure, and inclusive community where students, faculty, and staff may experience academic, professional, and personal success. To achieve this goal, the Department of Public Safety provides a comprehensive program of law enforcement, security, crime prevention, fire safety, emergency medical response, parking, and related public safety services to help ensure the College community remains a safe and pleasant place to live, work, and learn.

To further meet this objective, the Department of Public Safety has established a collaborative and intentional partnership with our students, faculty, and staff. We also lean into and leverage the latest technology to fill in the gaps outside of our personnel. This includes electronic card access and video cameras to monitor and protect our residence halls, Blue Light Emergency Phones, RAVE mobile alerts, and emergency broadcast sirens. This partnership is the foundation for maintaining an environment that encourages mutual respect, caring, and safety for our campus community.

On behalf of the entire Department of Public Safety, I thank you and present our Annual Security and Fire Report.

Sincerely,

Patrick Foley
Director & Chief of Public Safety
Phone: (617) 333-2159
patrick.foley@curry.edu





Curry College Department of Public Safety Overview & Authority



The Curry College Department of Public Safety is the primary law enforcement agency of the College. The Department is located on the north side of the Milton Campus at 940 Brush Hill Road. The department operates 24 hours a day, seven days a week, and 365 days a year. Our non-emergency business hours are Monday through Thursday 8:30 AM to 7:00 PM, and Fridays 8:30 AM to 4:30 PM. The Curry College Department of Public Safety is a hybrid campus safety agency that employs non-sworn civilian staff trained as Public Safety Officers and sworn and POST Certified police personnel.

The Department is currently authorized for a total of 16 members made up of a Chief of Police & Director of Public Safety, a Deputy Chief of Police & Public Safety, two Lieutenant's, four Sergeants, and eight Public Safety Officers. Additionally, the Department has three part-time Public Safety Officers and a Security Systems Administrator. Members of the Department receive training in a variety of topics that include implicit bias, dealing with individuals in mental health crisis, first aid and CPR, de-escalation techniques, investigation principles, and report writing. Department personnel also receive specialized training in campus specific topics such as conducting sexual assault investigations, crime prevention, identification of hate crimes, domestic violence intervention, as well as active shooter response.

Sworn police personnel have all attended and completed a Massachusetts Municipal Police Training Committee Police Academy and have been certified by the newly formed Massachusetts Peace Officers Standards and Training Commission (POST C). They must adhere to strict compliance and complete a minimum of 40 hours of annual in-service training. Certified Officers are certified for a period of three years and must recertify every three years. The Curry College Department of Public Safety & Police adheres to all POST C guidelines as it relates to the reporting of disciplinary action and infractions by officers; all of which is public record.

Sworn personnel receive their police powers from the Massachusetts State Police as Special State Police Officers under M.G.L. Ch. 22C, Sec. 63 as police officers of the college. They have full police powers on all property owned by Curry College which includes the power of arrest; however, the Department maintains a great working relationship with the Milton Police Department. Sworn personnel are also duly sworn as Deputy Sheriff's in Norfolk County.

In addition to their law enforcement roles, all officers are trained and certified First Responders and can administer basic first aid, Cardiopulmonary Resuscitation (C.P.R.), Automated External Defibrillator (A.E.D.), and Naloxone (Narcan).

We appreciate you taking the time to review this report. For additional information, please also visit our [website](#).

If you have any non-emergency questions concerning safety at Curry College, please feel free to contact us by phone at (617) 333-2232 or stop by our office during regular business hours.

**For all emergencies at our Milton Campus please utilize our emergency number:
(617) 333-2222 or 911**

Jurisdiction

Milton Campus

Curry College is located at 1071 Blue Hill Avenue in the town of Milton, Massachusetts and is situated on 131 acres. The campus abuts Route 138 and is only a block away from Boston's Hyde Park neighborhood. The campus is also very close to the Blue Hills Reservation. The Milton campus is home to more than 1,500 traditional undergraduate students that reside within 19 residence halls. In addition, the College serves approximately 500 traditional commuter students, 1,400 continuing education students and 300 Graduate students. On any typical day of classes there is upwards to 2,000 people on campus. The Curry College Department of Public Safety is the primary law enforcement and safety agency for this location.

Milton Police Department
Phone: (617) 698-3800

Emergency 911

Massachusetts State Police
(H7)
Phone: (617) 698-5840

Emergency 911

Curry College Department
of Public Safety
Phone: (617) 333-2232
Emergency (617) 333-2222

Plymouth Campus

Curry College ceased operation of the Plymouth campus in late 2025. Curry College's Plymouth Campus is located at 36 Cordage Park Circle, suite #200, in the Town of Plymouth Massachusetts. This campus is dedicated to Continuing Education students. The building is owned by Cordage Commerce Center, J.D. Cordage, 10 Cordage Park Circle suite #235, Plymouth MA, 02360 and is leased to the College. The building is shared with other tenants. Tenants have their own entrances and exits to their suites, which are clearly marked and secured by key access. For logistical purposes, the Town of Plymouth Police Department is the primary law enforcement and safety agency that responds to calls for service at this location. Students, faculty, staff, and guests that have any questions or concerns regarding their safety at our Plymouth campus should contact the:

Plymouth Police Department
20 Long Pond Road
(508) 830-4218

Emergency: 911

Massachusetts State Police
(617) 698-5840

Emergency 911

The Canton Ice House

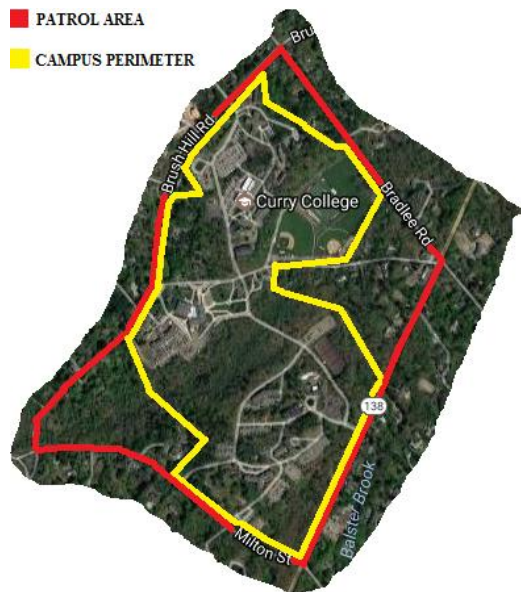
The Canton Ice House is located at 65 North Street, Canton, MA. This ice rink is utilized by the College for its hockey team practices and games throughout the hockey season. The Curry College men's hockey season is from October through March. In addition to being used by the Curry College hockey team it is also open to the public. The ice rink is owned by Canton Ice House, LLC. The following agencies have jurisdiction at this site:

The Town of Canton Police Department
1492 Washington Street
(781) 821-5090/Emergency 911

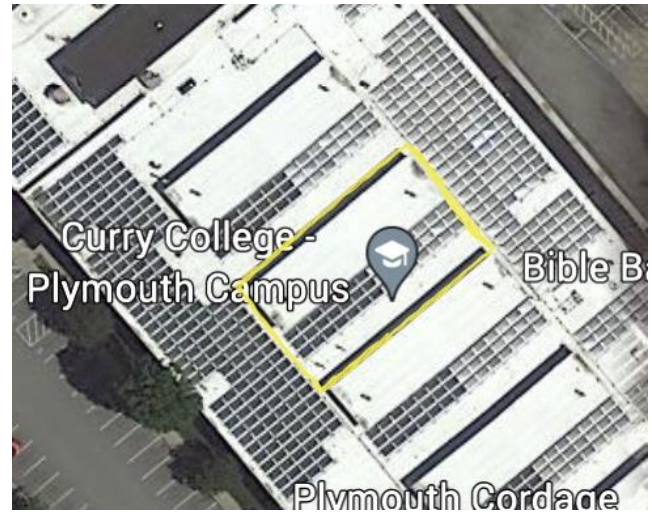
Massachusetts State Police (H-7)
685 Hillside Street
(617) 698-5840/Emergency 911

Clery Geographical Jurisdiction

Milton Campus



Plymouth Campus



Non-Campus Locations The Canton Ice House



Curry College's Clery Act geographic boundaries include all campus, and non-campus buildings or property controlled by an officially recognized student organization, along with all public property that is immediately adjacent to and accessible from campus.

**Note: All areas within the YELLOW zones are considered Curry's Clery Geographical zone. The area within the RED zone of the Milton Campus is patrolled by The Curry College Department of Public Safety*

Interagency Cooperation and Information Sharing

During the time covered by this report the Curry College Department of Public Safety had a signed Memorandum of Understanding or Mutual Aid pacts with Milton Police Department. In addition, the College has built close working partnerships with the following State and Local Agencies:

Milton Police Department

Canton Police Department

Boston Police Department (District E18)

Local Emergency Planning Committee: (Milton Police & Fire, Milton Board of Health, Beth Israel Deaconess Hospital - Milton, Milton Public Schools, and Milton Academy)

Massachusetts State Police

Norfolk County Sherriff's Department

Norfolk County District Attorney's Office

Plymouth Police Department

The Department of Public Safety also receives/shares safety, security, and intelligence information with the following agencies:

Boston Police Department

Massachusetts State Police

Milton Police Department

Department of Homeland Security

Department of Justice

Massachusetts Emergency Management Agency

Norfolk County Sherriff's Department

Norfolk County District Attorney's Office

Plymouth Police Department

Emergency Services - Reporting a Crime or Incident

In the event of an emergency or to report a crime on the Milton campus, members of the campus community should call the Department of Public Safety at **ext. 2222** from any campus telephone. From a cell phone, dial **(617) 333-2222**. The Curry College Department of Public Safety (CCDPS) encourages the accurate and prompt reporting of all crimes and emergency incidents. Please remember that timely reporting leads to the best outcomes in any situation.

Emergency Numbers:

On Campus, POLICE\FIRE\EMS:	ext. 2222
On Campus, POLICE\FIRE\EMS: (via Cell)	(617) 333-2222
Off Campus POLICE\FIRE\EMS:	911
Plymouth Campus, POLICE\FIRE\EMS:	911
Canton Ice House, POLICE\FIRE\EMS:	911

Other Numbers:

On Campus CCDPS Non-Emergency Line:	ext. 2232
On Campus CCDPS Non-Emergency Line: (via Cell Phone)	(617)-333-2232
Anonymous Tip Line:	(617) 391-5280
Counseling Services:	(617) 333-2182
Health Clinic:	(617) 333-2182
Student Affairs:	(617) 333-2289
A New Day (Sexual Assault & Domestic Violence 24 Hour Hotline)	(508) 588-8255
Beth Israel Deaconess Hospital – Milton	(617) 696-4600
Milton Police Department	(617) 698-3800
Title IX & Equity Compliance	(617) 333-2212

Emergency Services - Reporting a Crime or Incident (Continued)



On-Campus Emergency Telephones

Emergency telephones are located throughout the Milton campus. They can be identified by the blue light directly above them. The telephones are simple to operate and may be used as a direct line to the Public Safety or may be utilized as a campus phone. *(See Appendix on page 91 for locations)*

To operate in an emergency, simply press the “emergency” button at the lower right corner of the panel. You will hear a dial-tone and then dialing. The call will ring directly to a Public Safety Dispatcher and the call will be taken as an emergency service request.

Elevator Emergency Buttons

Like the emergency phones throughout campus, each elevator also has an emergency button that can be activated in case of an emergency. To activate simply press the “emergency” button and a light will come on. You will then hear a dial-tone followed by dialing. The call will ring directly to a Public Safety Dispatcher and the call will be taken as an emergency service request.

Panic Buttons

There are several “panic buttons” throughout campus that are typically located in Academic and Administrative buildings. The exact locations of these buttons are not made public; however, staff and faculty are made aware of their locations.

Response to Reports

Dispatch services are available 24 hours a day to answer calls for service. Priority response is given to crimes against persons, medical emergencies, and fire safety hazards. In the case of a non-emergency, CCDPS will take the required action, either dispatching an officer or asking the caller to report the incident in person during business hours. Special services include experienced investigators as well as the availability of local, state, and federal law enforcement agencies in providing support and assistance. CCDPS incident reports may be forwarded to local police, the Norfolk County District Attorney’s Office, the Office of Community Standards and Accountability as well as Health Services when appropriate.

Campus Security Authorities

Aside from CCDPS officers, the Clery Act defines a Campus Security Authority as: “An official of an institution who has significant responsibility for student and campus activities, including, but not limited to, student housing, student discipline and campus judicial proceedings. An official is defined as any person who has the authority and the duty to take action or respond to particular issues on behalf of the institution.” (U.S. Department of Education, 2016) CSAs are responsible for reporting allegations of Clery Act crimes that are reported to them in their capacity as a CSA to the official or office designated by the institution to collect crime report information. Curry CSAs may report to

either the Title IX coordinator or the Department of Public Safety. A benefit of CSAs is that some individuals may be hesitant to report crimes to the police but may be more inclined to report incidents to other campus-affiliated individuals. It is noteworthy that CSAs are not required to confirm or investigate reports made to them.

The Curry College Campus Security Authorities include but are not limited to:

- All police and public safety staff
- Resident Assistants and Community Directors
- Dean of Students Office (Leaders in Student Affairs and Housing)
- Athletic Directors and coaches (including Assistant ADs and assistant coaches)
- Faculty or Staff advisors to student organizations on Campus
- Access Monitors (any professional or student staff members who monitor access into campus)
- Staff in the Student Activities Office (handling co-curricular activities)
- Administrators at Branch/Satellite/Separate Campuses
- Study Abroad Coordinators
- Off Site Trip Coordinators
- Title IX Coordinator(s)
- Director of Student Health Center

Counselors and Confidential Reporting

Campus Pastoral Counselors and campus Professional Counselors, when acting as such, are not considered campus security authorities and are not required to report crimes for inclusion into the Annual Security Report. The Curry College Counseling Center counselors determine on a case-by-case basis when and how to encourage patients to report crimes voluntarily to law enforcement for investigation and when and how to confidentially report crimes solely for inclusion in the College's annual security report.

The Clery Act defines Counselors as:

Pastoral Counselor: An employee of an institution, who is associated with a religious order or denomination, recognized by that denomination as someone who provides confidential counseling and who is functioning within the scope of that recognition as a pastoral counselor.

Professional Counselor: An employee of an institution whose official responsibilities include providing psychological counseling to members of the institution's community and who is functioning within the scope of his or her license or certification.

Timely Warnings & Emergency Notifications

The Clery Act mandates two different kinds of notifications to the community based on specific information regarding an incident; these are known as a Timely Warning and an Emergency Notification.

A Timely Warning will be issued when a specific Clery crime has been reported to a Campus Security Authority or local law enforcement and poses a serious or ongoing threat to the community and has occurred within the Clery geography outlined previously in this report.

An Emergency Notification will be issued when there is **confirmation** of an *immediate* threat to the health and safety of the community and this threat occurred on campus.

The guiding principle in issuing either a Timely Warning or Emergency Notification is to keep you properly informed, along with preserving the safety and security of the Curry community.

CCDPS is responsible for preparing and issuing Timely Warnings and Emergency Notifications on the Milton campus. Every decision will be made on a case-by-case basis considering the facts surrounding the incident. These factors include but are not limited to the severity and nature of the incident, the continuing danger to the campus community, and the possible risk of compromising law enforcement efforts.

The issuance of a Timely Warning will be made for Clery specific crimes that have occurred within Clery specific geography. Clery crimes include all of the following:

- Criminal Homicide Murder, Non-Negligent Manslaughter, and Negligent Manslaughter
- Aggravated Assault
- Arson
- Burglary
- Robbery
- Motor Vehicle Theft
- Sex Offenses (Rape, Fondling, Incest, Statutory Rape)
- Weapons Violations
- Liquor Law Violations
- Drug Law Violations
- Hate Crimes (Larceny-Theft, Simple Assault, Intimidation, Destruction/Damage/Vandalism of Property)
- Hazing
- Domestic Violence
- Dating Violence
- Stalking

Warnings or Notifications may also be posted for other crime classifications, as deemed necessary. There may be instances where the issuance of a warning/notification may not be practical. For example, if an assault occurs between two students who have a disagreement but there is no ongoing threat to other community members. In cases involving sexual assault, they

are often reported long after the incident occurred, thus it would be difficult to distribute a “timely” warning notice to the community. Sex offenses will be considered on a case-by-case basis depending on when and where the incident occurred, whether the suspect(s) are known or have been apprehended and when the crime was reported.

Information for Warnings or Notifications may also come from other law enforcement agencies. Warnings or Notifications will be issued to the campus community as soon as pertinent information about the incident is available. All Warnings and Notifications will be delivered using the RAVE Mobile Safety platform. This platform automatically enrolls students, faculty, and staff and sends alerts via text message, email, and or phone call. The end user can select and determine their preferred method of contact, and their contact information should be updated regularly.

Timely Warning/Emergency Notification Issuance Protocol

Timely Warnings and Emergency Notifications will be sent to all students, faculty and staff via the RAVE Mobile Alert platform and will be posted on the [myCurry portal](#) page and the main Curry website. Alternative methods for distributing Warnings and Notifications may include media releases, campus newspapers, flyers posted in campus buildings, emails, and message boards.

Whenever local authorities make the CCDPS aware of an off-campus crime or incident that represents an ongoing threat to the safety of students, faculty, and staff, the College will issue a Timely Warning or Emergency Notification.

Information included in a Timely Warning may contain but is not limited to:

- The date the incident occurred
- The nature of the incident
- The location of the incident
- Prevention tips
- How to report a similar incident

A Timely Warning will be distributed to the entire campus community.

Information included in an Emergency Notification may contain but is not limited to:

- Information about the emergency
- Actions one needs to take immediately because of the emergency
- Evacuation procedures if necessary
- Assurance that an all clear will be sent when the emergency is over

An Emergency Notification may only be sent to a segment of the entire campus community, if appropriate.

Timely Warnings and Emergency Notifications may be updated if new and relevant information becomes available.

Emergency Alerts from Curry College

Text, Email, Website, and Phone Alerts

All students, faculty, and staff are automatically enrolled in the RAVE Mobile Alert platform which is responsible for sending alerts via text message, email, and phone call. The RAVE Mobile Alert system sends information in real time and can be updated as needed. A test of the RAVE Mobile Alert system will happen on an annual basis at a minimum to remain in compliance with the Clery Act.

Emergency Alerts Protocol

Emergency Alerts will primarily be sent out by the CCDPS as soon as an emergency is confirmed. However, there may be times where these alerts may be sent in conjunction with the College's Public Relations liaison. CCDPS will without undue delay, and considering the safety of the community, determine the content of the alert and initiate the notification. (Unless issuing a notification will, in the professional judgment of the responsible authorities, compromise efforts to assist a victim or to contain/respond to or otherwise mitigate the emergency) Alerts will normally be sent to all phones and email addresses provided to the College. Curry College may also disseminate emergency information through the [College's website](#), social media, radio, and local TV news.

If you would like to receive emergency alerts, you will need to make sure your most recent contact information has been provided.



Other Emergency Alert Measures

In addition to text, email and phone alerts, Curry College will notify the community of a potential or significant emergency and or dangerous situation through other methods including:

- **Outdoor Speaker Arrays (Milton Only)**

There are two Siren/Public Announcement arrays located on the Milton campus. One array is located on the North side of campus and the other is located on the South side of campus. The arrays are capable of producing emergency siren tones as well as audible voice communication.

- **Curry College Radio WMLN-FM 91.5 & Curry TV CC8 (Milton Only)**

Curry College owns and operates its own FM band radio station on the Milton campus. In addition, Curry College also operates its own TV studio and is viewable on all Milton campus televisions. During an emergency both WMLN and Curry TV CC8 will broadcast emergency notifications if staff are available at these locations.

- **Face-to-Face**

In some situations, direct contact between emergency responders and members of the campus community can serve as another means of communicating information, particularly when other systems fail or are unavailable.

Emergency Management and Evacuation Procedures

The Curry College Department of Public Safety, in conjunction with the Emergency Management Committee, provides emergency management response and guidance. Emergency response and evacuation procedures are identified in the Curry College *Emergency Management Guide (EMG)*. The EMG outlines how the Curry College community (students, faculty, staff, and visitors) should react in case of an emergency or disaster.

Curry College believes well-established comprehensive preparedness in emergency management procedures and training are vital to the successful response by the Curry College community in the case of an emergency or disaster. Curry College and the CCDPS provides seminars and resources in dealing with emergency preparedness to all members of the community. Every classroom on both the Milton and Plymouth campus has an Emergency Management Guide that is clearly identifiable by its red plastic cover. The guide explains what individuals should do in the following situations: Evacuations, Administration of CPR, Fires, Lockdown/Active Shooter, Intruder/Suspicious Person/Hostage Taker, Hazmat, Accident/Serious Injury/Illness or Allergic Reaction, and Bomb Threats. A copy of the guide- is also available on the College's website. The Plymouth Campus follows the same guidelines as the Milton campus but rather than calling Public Safety students, faculty and staff are instructed to dial 911.

Residence Hall Fire/Evacuation drills are also conducted at least annually on the Milton campus. The purpose of evacuation drills is to prepare residents for an organized evacuation in case of fire or another emergency. These drills are used to educate and train occupants on how to successfully leave their specific building during an emergency.

Emergency Response

CCDPS will respond to emergencies and disasters on the Milton campus by utilizing the National Incident Management System (NIMS) and Incident Command System (ICS) developed by the Federal Emergency Management Agency. In addition, CCDPS will reach out to local and state agencies for mutual aid. For particularly large incidents affecting the entire campus, the CCDPS and local agencies will set up an Incident Command Post (ICP). The ICP will provide support and coordination, to identify resource issues, gather and provide information, and implement multi-departmental decisions.

The NIMS\ICS will be activated to a level appropriate to the scope of the emergency when:

- There is an actual or potential emergency that only affects Curry College or when the Town of Milton declares a State of Emergency that could affect the College.
- When the Governor has proclaimed a state of emergency in an area that includes Curry College.
- When the U.S. President declares a national emergency in an area that includes Curry College.

Emergency Classification Levels

An emergency classification is a description of conditions, which indicate a level of risk to the College. Curry utilizes a three-level emergency classification system to classify the severity of and response to an incident. The levels are:

Level 1 (Minor Emergency): A Level 1 incident is any incident, potential or actual, that does not seriously affect the overall functional capacity of the college. These incidents normally can be resolved with existing Curry College resources or limited outside help and are typically handled at the department level.

Level 2 (Major Emergency): A Level 2 incident is any incident, potential or actual, that affects an entire building or buildings, and which may disrupt all or a portion of the operations of the College. These would be campus emergencies that require a coordinated response beyond normal operating capabilities of the College. Outside emergency services may be required.

Level 3 (Disaster): A Level 3 incident is any event or incident that has the potential or does seriously impair or halt all College operations. Such major campus disasters require a coordinated response by all campus resources and outside emergency service agencies.

Emergency Communications Receiving Point

The College's primary emergency communication capabilities are located at the Department of Public Safety Communications Center on the Milton campus. The Communications Center operates 24 hours a day, 365 days a year and serves as a centralized receiving point for all information that may require emergency notification. Information received from reports made by the campus community as well as information/intelligence that is reported from various local, state, and federal law enforcement agencies help coordinate the appropriate emergency response.

Once a significant emergency or dangerous situation posing an immediate threat to the health or safety of students, faculty, staff, and guests is confirmed, the CCDPS will notify the campus community, unless the department determines that such notification would place the community at a greater risk or would compromise efforts to contain the emergency.

Evacuations

In certain circumstances, the CCDPS or other public safety agencies may deem it necessary to evacuate a building or portion of campus to a safer area. In the event of a single building evacuation, occupants should proceed to a designated meeting area as directed by first responders. When orders are given to evacuate multiple buildings or large areas of the campus, all students, faculty, staff, and visitors should proceed to evacuate as directed by first responders. In such cases, emergency notification systems will be used in conjunction to officers on the ground to help instruct the campus community. The following two types of evacuation may occur:

- **Limited Evacuation**

Curry College policy requires the immediate evacuation of a building when a fire alarm sounds within a building. All students, faculty, staff, and any other individuals within the building must immediately depart the building using available exit routes if safe. All building occupants will follow instructions issued by first responders or the building administrators. Additionally, conditions for temporary evacuation of a building or area also include, but are not limited to, incidents of mechanical, electrical, or other utility related failures; health, safety and or environmental issues such as hazardous spills and other emergency conditions.

- **Campus-wide Evacuation**

In the rare event, that a significant incident threatens the safety of the entire campus, CCDPS, in consultation with the appropriate college authorities and external public safety agencies, will determine if a campus-wide evacuation is warranted.

Shelter in Place/Lockdown Order

Shelter in place/lockdown orders mean to seek immediate shelter and remain there during an emergency rather than evacuate the area. Taking shelter inside may be in response to an external hazard such as a chemical release from an industrial or transportation accident, hazardous weather, police, fire, public health emergencies, or acts of violence. Each situation is unique and shelter in place techniques may vary based on the incident. The decision to shelter in place may be made by CCDPS or by other public safety agencies. There may be some situations, where you may have to decide for yourself to shelter in place based on your assessment of the incident.

Regardless of who decides when to shelter in place, your goal is to seek shelter in the nearest building (preferably in a room with no windows), if it is safe to do so. Make sure to listen to the outdoor warning sirens/PA system, or emergency personnel on the ground.

Special Considerations for Sheltering in Place/Lockdowns

1. Severe Weather (Tornado, Severe Thunderstorm, or Hurricane)

- Immediately, go to a safe location inside a building. The National Weather Service recommends occupants go to the lowest level of the building. If you are unable to get to a lower level, go to the center of the building and stay away from windows.
- If you encounter an individual with special needs attempt to provide assistance if possible.
- Wait for an all clear by the National Weather Service or from public safety authorities.

2. Hazardous materials (HAZMAT)

- Immediately go to a safe location inside a building and close all windows and doors.
- Do not go outside or attempt to leave unless you are specifically instructed to evacuate.
- If you encounter an individual with special needs attempt to provide assistance if possible.
- Wait for further instructions from public safety authorities.

3. Active shooter, Building Intruder or Civil Disturbance

- Immediately go to a safe location inside a building if you cannot safely leave the area or building.
- If possible, take refuge in a room that can be locked. If unable to lock the door, secure and barricade it by any means possible. For inward opening doors pile furniture against it. For outward opening doors pull the handle by using a belt, or bag strap.
- The room should provide limited visibility to anyone that is outside of it. Silence all phones, mobile devices, and computers, turn off the lights, and close blinds.
- After getting to a safe location and without jeopardizing your safety, try to obtain additional clarifying information by all possible means (e.g., text message, e-mail, etc.)
- Wait for instructions from public safety authorities.

Meetings, Seminars, Drills, and Exercises

Curry College believes that emergency drills and exercises are vital to emergency preparedness and response. Drills and exercises allow practitioners to develop the necessary skills and strategies to succeed in a real emergency. Curry College has and will continue to offer meetings, trainings, seminars, drills, and exercises to the community to better prepare students, faculty, and staff to make the best decisions when seconds count.

The following chart shows meetings, seminars, drills, and exercises held by Curry College at the Milton Campus for years 2023-2025:

Date	Activity	Announced or Unannounced	Description
Aug. 2023	Training (Online)	Announced	Curry College hired Synergy Solutions Inc., a leader in Workplace Violence training to conduct Active Shooter Training for current students. Participants learned the key concepts of the “4Ls”: Locate, Lockdown, Leave, and Live.
Nov. 15, 2023	Drill	Unannounced	Curry College along with Milton Fire Department conducted Fire Alarm drills at each residence hall. This ensures that students understand how to exit the building and where to gather in case of a true emergency.
Nov. 29, 2023 1:25 PM	Exercise	Unannounced	An exercise of the Emergency Alert and Siren Test. This is in conjunction with the Town of Milton Police and Fire departments. The test delivers a notification using text, e-mail, phone, video displays and two emergency loudspeakers on campus. To be used in case of a disaster, campus demonstration, or active shooter.
August 2024	Training (Online)	Announced	Curry College hired Synergy Solutions Inc., a leader in Workplace Violence training to conduct Active Shooter Training for current students. Participants learned the key concepts of the “4Ls”: Locate, Lockdown, Leave, and Live.

Fall 2024	Drill	Unannounced	Curry College along with Milton Fire Department conducted Fire Alarm drills at each residence hall. This ensures that students understand how to exit the building and where to gather in case of a true emergency.
Fall 2024	Exercise	Unannounced	An exercise of the Emergency Alert and Siren Test. This is in conjunction with the Town of Milton Police and Fire departments. The test delivers a notification using text, e-mail, phone, video displays and two emergency loudspeakers on campus. To be used in case of a disaster, campus demonstration, or active shooter.
Spring 2025	Exercise	Unannounced	An exercise of the Emergency Alert and Siren Test. This is in conjunction with the Town of Milton Police and Fire departments. The test delivers a notification using text, e-mail, phone, video displays and two emergency loudspeakers on campus. To be used in case of a disaster, campus demonstration, or active shooter.
Spring 2025	Training- In Person	Announced	Deputy Chief Bevilacqua and Chief Foley conducted several sessions of CRASE to members of the Curry Community to prepare for an active shooter.
Summer 2025	Training- Online	Announced	Curry College contracted with Vector Solutions to offer online training for new and incoming students about active shooter and emergency preparedness.
Fall 2025	Exercise	Unannounced	An exercise of the Emergency Alert and Siren Test. This is in conjunction with the Town of Milton Police and Fire departments. The test delivers a notification using text, e-mail, phone, video displays and two emergency loudspeakers on campus. To be used in case of a disaster, campus demonstration, or active shooter.

Mass Notification & Emergency Communication System Tests

CCDPS is responsible for testing all emergency communications systems on the Milton Campus. At least once a year the College tests the functionality of each of the emergency alert systems including the RAVE Mobile Alert platform, notifications on the [College website](#) and [myCurry portal](#) as well as the siren/public announcement speaker on the Milton Campus.

The College makes every effort to notify all students, faculty, staff, and neighbors of the Milton campus well in advance of the test. Any questions regarding the Mass Notification & Emergency Communication System Tests may be directed to the CCDPS office at (617) 333-2232.

Missing Student Notification

Every Curry student has the option to identify a designated contact person who they wish to be contacted by the College, if they are ever determined to be missing for 24 hours or more by CCDPS or local law enforcement. Students may register their contacts confidentially by visiting [myCurry portal](#).

If a student is determined by CCDPS or local law enforcement to be missing for 24 hours, the confidential contact information will be accessible only to authorized campus officials and will not be disclosed by Curry, except to law enforcement personnel in furtherance of a missing person investigation. Students under 18 years of age who are not emancipated are advised that Curry is required by law to notify a custodial parent or guardian within 24 hours of a determination that the student is missing in addition to notifying any additional contact person designated by the student.

If a member of the Curry College community has reason to believe that a student is missing or otherwise receives a report of a missing Curry student, he or she must immediately notify Public Safety at 617-333-2222. CCDPS will generate a missing person report and initiate an investigation. After receiving the report, should CCDPS determine that the student is missing, they will notify the Milton Police Department (unless the Milton-Police Department notified Curry that the student was missing) and provide the student's registered contact, if any, no later than 24 hours after the student has been determined to be missing.

If a member of the Curry College Community has reason to believe that a student is missing, whether the student resides on campus or not, Curry College will initiate efforts to locate the student to determine his or her state of health and well-being through the collaboration of the CCDPS and the Office of Student Affairs. If the student is an on-campus resident, the CCDPS will collaborate with the Office of Student Affairs to make a welfare check into the student's room.

If the student is a commuter or a continuing education or graduate student, the CCDPS will enlist the aid of the police agency having jurisdiction over the matter. Concurrently, College officials will endeavor to determine the student's whereabouts through contact with friends, associates, and/or employers of the student. College officials will endeavor to determine whether the student has been attending classes, scheduled organizational or academic meetings, or appearing for scheduled work shifts. If the student is not located within 24 hours of receiving the initial report, the College may notify the student's family, in addition to any additional emergency contacts the student has registered, to determine if they know of the whereabouts of the student. If the student is an off-campus resident, appropriate family members or associates are encouraged to make an official missing person report to the law enforcement agency with jurisdiction over the matter. The CCDPS will cooperate, aid, and assist the primary investigative agency in all ways prescribed by law.

Publication of the Annual Security and Fire Report

The Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act commonly referred to as the “Clery Act,” requires all institutions of higher education receiving federal financial aid to report specified crimes statistics on their campuses and to provide other safety and crime information to members of the campus community. Each institution must publish an Annual Security Report detailing statistics regarding reported crimes committed on campus and at affiliated locations for the previous three calendar years. In addition, the report must describe specified policies, procedures and programs regarding safety and security. The Clery Act is intended to provide students, potential students and their families, with accurate, complete and timely information about the safety of the institution so that they can make informed decisions.

The Clery Act requires the collection and reporting of annual crime statistics reflecting reports of specified crimes that occur on and adjacent to the institution’s campus and all properties owned or controlled by such institutions and used for educational purposes. The statistics for Curry College are gathered from reports made to the CCDPS, Residence Life and Housing, the Office of Community Standards and Accountability, Division of Student Affairs, Campus Security Authorities, and local police agencies. The statistical compilation must be broken down by specified types of crimes and campus disciplinary referrals. The report must indicate if a specified crime is a hate crime. Another requirement of the Clery Act is the institution must provide a geographic breakdown of the crime statistics per the following define geographic areas: “on campus” (including a further breakdown of the number of crimes that occurred in campus student residential facilities), “in or on a non-campus building or property” and “on public property.”

Policy for Reporting the Annual Disclosure of Crime Statistics

The Curry College Department of Public Safety prepares an Annual Security Report to comply with the Jeanne Clery Disclosure of Campus Security Policy and Crime Statistics Act. The report is prepared in cooperation with Residence Life and Housing, the Office of Community Standards and Accountability, Student Affairs, the Title IX coordinator, and local law enforcing agencies. Each of these departments provides updated information on their educational efforts and programs to comply with the Act.

CCDPS officers enter all crime and safety incidents that are reported directly into a case management software system. At the time of this report the department currently utilizes ARMS computer aided dispatch and records management software system. Additionally, the College utilizes Ellucian Company’s “Banner” software and Maxient LLC software. Once an officer enters the report in the program, a department administrator reviews the report to ensure it is appropriately classified in the correct crime category. The department periodically examines the data to ensure that all crimes that have been reported are recorded in accordance with the crime definitions outlined in the FBI Uniform Crime Reporting (UCR) Handbook and the FBI National Incident Based Reporting System (NIBRS) Handbook. At the end of the year, crime statistics are gathered from the filed incident reports. The Annual Security Report and Annual Fire Safety Report are updated each year, and they are available on our website and also in-person and available to all students, employees, prospective students, prospective employees, and the public as required by the Jeanne Clery Disclosure of Campus Security Policy and Crime Statistics Act.

Daily Crime Log

A daily crime log is available for review 24 hours a day and can be reviewed upon request at the Public Safety Building on the Milton campus or by calling (617) 333-2232. The purpose of the daily crime log is to record all criminal incidents that are reported to or identified by CCDPS and to show department transparency.

Disclosure of Campus Safety Policies

The Annual Security Report must describe specified campus policies concerning:

- Reporting criminal activity or other emergencies on campus
- Security of, maintenance of and access to campus facilities
- Authority of campus Security Officers and or Police Officers
- Monitoring and recording through local police agencies of off-campus criminal activities by students
- Alcohol and drug Policies

In addition, the report must describe:

- The type and frequency of campus programs to inform students and employees about campus security procedures and precautions and the prevention of crimes
- Available drug and alcohol abuse prevention education programs
- Campus programs to prevent sexual assaults, including procedures to be followed when such an assault occurs
- Where information concerning registered sex offenders may be obtained

Clery Act Location Definitions

Campus:

Any building or property owned or controlled by an institution within the same reasonably contiguous geographic area and used by the institution in direct support of, or in a manner related to, the institution's educational purposes, including residence halls; and any building or property within the same reasonably contiguous geographic area of the institution that is owned by the institution but controlled by another person, is frequently used by students and supporters for institutional purposes (such as food or other retail vendor).

Non-Campus Building or Property:

Any building or property owned or controlled by a student organization officially recognized by the institution; or any building or property (other than a branch campus) owned or controlled by an institution that is used in direct support of or relation to the institution's educational purposes, is frequently used by students and is not within the same reasonably contiguous geographic area of the institution. Non-campus buildings or property includes locations where "Official" College sponsored extended trips occur.

Public Property:

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

Separate Campus:

In broad terms, the Clery Act defines separate locations as other institution-owned or controlled locations that may include satellite, extension or similar types of non-contiguous sites that have an organized program of study and administrative personnel on-site.

Crime Statistics Summary Report

Curry College is required by the Clery Act to publish a Crime Statistics Summary Report on an annual basis. The yearly report covers the previous three calendar years and the information contained within is submitted to the U.S. Department of Education and can be viewed at [The Office of Postsecondary Educations website](#). When viewing this site click on the "Get Data for One School" and search using "Curry College"

Definitions of Reportable Crimes Under the Clery Act

Primary Crimes

Criminal Homicide- Murder & Non-Negligent Manslaughter: the willful (non-negligent) killing of one human being by another human being

Criminal Homicide- Negligent Manslaughter: the killing of another person through gross negligence

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

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

Note that only fires determined through investigation to have been willfully or maliciously set are classified as arson. Arson is therefore the only Clery Act offense that must be investigated before it can be disclosed. If other Clery Act offenses were committed during the arson incident, the most serious is counted in addition to the arson.

Burglary: The unlawful entry of a structure to commit a felony or a theft. For reporting purposes this definition includes unlawful entry with intent to commit a larceny or felony; breaking and entering with intent to commit a larceny; housebreaking; safecracking; and all attempts to commit any of the aforementioned

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

Motor Vehicle Theft: The theft or attempted theft of a motor vehicle. A motor vehicle is self-propelled and runs on the surface and not on rails. Motorboats, construction equipment, airplanes, and farming equipment are specifically excluded from this category.

Sex Offenses

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

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

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

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

Alcohol, Drug, & Weapons Violations

Liquor Law Violations: The violation of state or local laws or ordinances prohibiting: the manufacture, sale, transporting, furnishing, possessing of intoxicating liquor; maintaining unlawful drinking places; bootlegging; operating a still; furnishing liquor to a minor or intemperate person; using a vehicle for illegal transportation of liquor; drinking on a train or public conveyance; and all attempts to commit any of the aforementioned. (Drunkenness and driving under the influence are not included in this definition.)

Drug Law Violations: Violations of State and local laws relating to the unlawful possession, sale, use, growing, manufacturing, and making of narcotic drugs. The relevant substances include Opium or Cocaine and their derivatives (Morphine, Heroin, Codeine); Marijuana; synthetic narcotics (Demerol, Methadone); and dangerous non-narcotic drugs (Barbiturates, Benzedrine).

Weapons Possession Violations: The violation of laws or ordinances prohibiting the manufacture, sale, purchase, transportation, possession, concealment, or use of firearms, cutting instruments, explosives, incendiary devices, other deadly weapons.

Hate Crimes

The Clery Act defines a Hate Crime as a criminal offense that manifests evidence that the victim was intentionally selected because of the perpetrator's bias against the victim. Under the Clery Act, Hate Crimes include any of the following offenses motivated by bias: Murder and Non-negligent Manslaughter, Sexual Assault, Robbery, Aggravated Assault, Burglary, Motor Vehicle Theft, Arson, Larceny-Theft, Simple Assault, Intimidation, Destruction/Damage/Vandalism of Property. Hate Crimes may be motivated by an offender's bias against a race, religion, gender, disability, sexual orientation, ethnicity/national origin, and/or gender identity.

Race: A criminal act preformed due to the negative opinion or attitude toward a group of persons who possess common physical characteristics (e.g., color of skin, eyes, and/or hair; facial features, etc.) genetically transmitted by descent and heredity which distinguish them as a distinct division of humankind (e.g., Asians, blacks, whites, etc.).

Gender Bias: A criminal act performed due to the negative opinion or attitude toward a person or group of people based on their actual or perceived gender. e.g., male or female.

Gender Identity Bias: A criminal act preformed due to the negative opinion or attitude toward a person or group of persons based on their actual or perceived gender identity. e.g., bias against transgender or gender non-conforming individuals.

Religion: A criminal act preformed due to the negative opinion or attitude a group of persons who share the same religious beliefs regarding the origin and purpose of the universe and the existence or nonexistence of a supreme being (e.g., Catholics, Jews, Protestants, atheists, etc.).

Sexual Orientation: A criminal act preformed due to the negative opinion or attitude a group of persons based on their sexual attraction toward, and responsiveness to, members of their own sex or members of the opposite sex (e.g., gays, lesbians, heterosexuals, etc).

Ethnicity/National Origin Bias: A criminal act preformed due to the negative opinion or attitude a group of people whose members identify with each other, through a common heritage, often consisting of a common language, common culture (often including a shared religion) and/or ideology that stresses common ancestry. The concept of ethnicity differs from the closely related term race in that “race” refers to grouping based mostly upon biological criteria, while “ethnicity” also encompasses additional cultural factors.

Disability: A criminal act performed due to the negative opinion or attitude a group of people has based on their physical or mental impairments/challenges, whether such disability is temporary or permanent, congenital or acquired by heredity, accident, injury, advanced age or illness.

Note: Larceny-Theft, Simple Assault, Intimidation, and Destruction/Damage/Vandalism of Property are included in your Clery Act statistics only if they are Hate Crimes.

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

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

Intimidation: To unlawfully place another person in reasonable fear of bodily harm using threatening words and/or conduct, but without displaying a weapon or subjecting the victim to actual attack. Includes cyber-intimidation if victim is threatened within Clery geography.

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

Violence Against Women Act (2013) Offenses

Domestic Violence: The term “domestic violence” means:

1. Felony or misdemeanor crimes of violence committed
 - (i) By a current or former spouse or intimate partner of the victim.
 - (ii) By a person with whom the victim shares a child in common.
 - (iii) By a person who is cohabitating with or has cohabitated with the victim as a spouse or intimate partner.

- (iv) By a person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction in which the crime of violence occurred; or
- (v) 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 jurisdiction in which the crime of violence occurred*.

For the purposes of complying with the requirements of this section and section 668.41 Code of Federal Regulations, any incident meeting this definition is considered a crime for the purposes of Clery Act reporting.

**Note: Massachusetts General Laws expands the definition of Domestic Violence to include violence between family or household members. (e.g., roommates) M.G.L. c. 209A § 1. However, The Clery Act never intended to include this expanded definition of Domestic Violence and thus any offenses meeting the Massachusetts definition are not included in this report.*

Dating Violence: The term “dating violence” means violence committed by a person:

1. Who is or has been in a social relationship of a romantic or intimate nature with the victim and
2. The existence of such a relationship shall be based on the reporting party's statement and consideration of the length of the relationship, the type of relationship, and the frequency of interaction between the people involved in the relationship.

For the purposes of this definition-

- (i) Dating violence includes, but is not limited to, sexual or physical abuse or the threat of such abuse.
- (ii) Dating violence does not include acts covered under the definition of domestic violence.

For the purposes of complying with the requirements of this section and section 668.41 Code of Federal Regulations, any incident meeting this definition is considered a crime for the purposes of Clery Act reporting.

Stalking: The term “stalking” means

1. Engaging in a course of conduct directed at a specific person that would cause a reasonable person to:
 - (i) Fear of the person's safety or the safety of others; or
 - (ii) Suffer substantial emotional distress.
 - (iii) For the purposes of this definition “Course of Conduct” means two or more acts, including, but not limited to, acts which the stalker directly, indirectly, or through third parties, by any action, method, device, or means follows, monitors, observes, surveils, threatens, or communicates to or about, a person, or interferes with a person's property.

- (iv) “Substantial Emotional Distress” means significant mental suffering or anguish that may, but does not necessarily, require medical or other professional treatment or counseling.
- (v) “Reasonable Persons” means a reasonable person under similar circumstances and with similar identities to the victim.

For the purposes of complying with the requirements of this section and section 668.41, any incident meeting this definition is considered a crime for the purposes of Clery Act reporting.

Stop Campus Hazing Act

Hazing: Intentional, knowing, or reckless act committed by a person (whether individually or in concert with other persons) against another person or persons regardless of the willingness of such other person or persons to participate, that is committed in the course of an initiation into, an affiliation with, or the maintenance of membership in, a student organization; and causes or creates a risk, above the reasonable risk encountered in the course of participation in the institution of higher education or the organization (such as the physical preparation necessary for participation in an athletic team), of physical or psychological injury including: (1) whipping, beating, striking, electronic shocking, placing of a harmful substance on someone’s body, or similar activity; (2) causing, coercing, or otherwise inducing sleep deprivation, exposure to the elements, confinement in a small space, extreme calisthenics, or other similar activity; (3) causing, coercing, or otherwise inducing another person to consume food, liquid, alcohol, drugs, or other substances; (4) causing, coercing, or otherwise inducing another person to perform sexual acts; any activity that places another person in reasonable fear of bodily harm through the use of threatening words or conduct; (5) any activity against another person that includes a criminal violation of local, State, Tribal, or Federal law; and any activity that induces, causes, or requires another person to perform a duty or task that involves a criminal violation of local, State, Tribal, or Federal law.

Student Organization *An organization at an institution of higher education (such as a club, society, association, varsity or junior varsity athletic team, club sports team, fraternity, sorority, band, or student government) in which two or more of the members are students enrolled at the institution of higher education, whether the organization is established or recognized by the institution*

Hierarchy Rule: A requirement in the FBI’s UCR program that, for purposes of reporting crimes in that system, when more than one criminal offense was committed during a single incident, only the most serious offense be counted.

Campus Accessibility and Security

Curry College's Milton campus is open to the public when classes and events are in session. The Department of Public Safety operates a Front Gate House with vehicular traffic gates at the College's Main Entrance on Route 138. The Front Gate is manned 24 hours a day, 365 days a year and acts as a sentry post and communication center.

The gates at this location remain open Monday through Friday 7:00 AM – 7:00 PM. In addition to the Main Entrance, there are seven other gated entrances; two separate locations on Milton Street, three separate locations on Brush Hill Road, one location on Bradlee Road, and one location on Atherton Street. The primary gate located on Brush Hill Road is open Monday through Friday 6:00 AM - 6:00 PM; all other gates remain closed and locked except in case of emergencies or campus events. These gates are all accessible by Milton Fire and Police Department using Knox Boxes.

During all other hours, vehicular traffic must stop at the Main Gate, speak to the sentry, and state their business. All Academic buildings are open to members of the campus community. When classes are in session these buildings are open Monday through Thursday 8:00 AM - 10:00 PM. On Fridays, weekends, and holidays, Academic buildings are only open for a limited number of hours. Institutional support buildings that house offices such as Admissions, Financial Aid, and Human Resources etc. are only open during the hours those offices operate.

Residence Hall doors are always locked and are only accessible through a computerized electronic access card system. Only residents of their own building and certain members of Residence Life, Buildings and Grounds and Public Safety may swipe into residence halls. All guests must be registered through the Residence Life Guest Registration system and guests must display an active guest pass on their phone during their stay.

Curry College also practices the concept of Crime Prevention through Environmental Design (CEPTED). Buildings and Grounds (B&G) with assistance from the Department of Public Safety and the Office of Residence Life surveys the campus for any issues that may pose a safety risk. This includes making sure that all lighting is in working order; trees and bushes are trimmed; and that door locks, emergency phones, surveillance cameras and windows are in good working order. Curry College encourages students and staff to report any malfunctions or issues to either B&G, CCDPS or Residence Life.

In addition to the measures above, the campus is patrolled by CCDPS officers 24/7. The College has installed surveillance cameras in areas on campus that are difficult to be adequately monitored by conventional campus patrols. At present, there are over 100 cameras installed on campus. All cameras are monitored by Public Safety staff at the Communication Center located at 940 Brush Hill Road.

Crime Prevention and Security Awareness Programs

The Curry College Department of Public Safety places particular emphasis on security awareness and crime prevention. A primary vehicle for accomplishing this goal is the College's comprehensive security awareness and crime prevention programs. These programs are based upon dual concepts of eliminating or minimizing criminal opportunities whenever possible and encouraging students and staff to be responsible for their own safety/security and the security of others. The following is a listing of the security awareness and crime prevention programs and projects offered by Curry College Department of Public Safety.

Community Policing

CCDPS practices Community Policing to stay connected and involved in the community. Officers regularly participate in and host seminars, and events. CCDPS is active in all aspects of student life including but not limited to: Athletic Events, New Student Orientation, Homecoming Weekend, Accepted Students Day, Open Houses, New Employee Orientation, Spring Weekend, Commencement Week, and more.

New Student Family Orientation Presentation

The CCDPS attends all New Student Orientation dates and presents on a variety of topics during the sessions for families and friends. This presentation covers an overview of the department, safety and security services, law enforcement function, crime prevention and education, and allows for questions from the audience.

C.R.A.S.E. Workshops

Deputy Chief Bevilacqua is certified through the Advanced Law Enforcement Rapid Response Training (ALERRT) as an instructor in Civilian Response to Active Shooter Events (CRASE). This training teaches valuable skills and information to our community members about how to prepare for and respond to active shooter events and instills the industry standard, Avoid, Deny, Defend which replaced Run, Hide, Fight. These workshops are available on a consistent basis to faculty, staff, and students and can also be requested on demand.

Safety Escorts

Curry College Department of Public Safety will provide escort services for students from one end of the campus to another. Students are instructed to first use the Curry College shuttle system during hours of operation. Once the shuttle service has ended, a student should call the CCDPS at 617-333-2222 for an escort or may utilize any of the campus emergency call boxes. CCDPS make every effort to respond to the location in a timely manner; however, an escort response may be delayed if officers are responding to an emergency on campus.

Anonymous Reporting

The CCDPS strongly advocates members of the campus community to call Public Safety directly to report any incident or crime. However, the department realizes some people are reluctant to do so out of fear of retaliation. Thus, the CCDPS has established a mechanism for Anonymous Reporting that is done in good faith. The department telephone (617) 333-2222 or email pubsaf@curry.edu may be used to report anonymously. However, the CDDPS takes the intentional reporting of false incidents seriously. Specifically Massachusetts General Laws, Part IV, Title I, Chapter 269, Section 13A

states; “Whoever intentionally and knowingly makes or causes to be made a false report of a crime to police officers shall be punished by a fine of not less than one hundred nor more than five hundred dollars or by imprisonment in a jail or house of correction for not more than one year, or both.”

Social Media and Community Bulletins

Crime prevention and security awareness information is continually posted on the CCDPS Facebook Instagram and Twitter accounts. In addition, literature and other printed material are posted in residence halls on a regular basis.

Residence Life Training Seminars

Public Safety and Community Standards and Accountability staff, along with senior members from Residence Life and the Dean of Students Office, present security and safety information to Resident Assistants and Community Directors (RAs & CDs) each year in August during a training workshop.

Campus Forums

Throughout the year representatives from CCDPS attend forums hosted by the student body as well as staff and faculty. During these forums, CCDPS presents students, faculty and staff with information on campus security and safety. These forums also allow the department to receive feedback from the campus community.

Wellness Education

The Curry College Office of Wellness Education offers the community programs and prevention initiatives around wellness, including sexual assault prevention and substance abuse education through many programs including but not limited to:

BASICS

Brief Alcohol Screening and Intervention for College Students (BASICS) is a one-on-one prevention program for college students who drink alcohol heavily and have experienced or are at risk for alcohol-related problems. BASICS follows a harm reduction approach, aiming to motivate students to reduce alcohol use to decrease the negative consequences of drinking.

Online Alcohol/Marijuana Education

The e-CHECKUP TO GO programs are personalized, evidence-based, online prevention interventions for alcohol & marijuana developed by counselors and psychologists at San Diego State University. This program provides accurate and personalized feedback about student individual patterns of use, risk patterns, aspirations and goals and provides helpful resources that students can access through Curry College and the community.

Curry Consent

Curry’s Sexual Assault Prevention Peer Educator Group responsible for educating the Curry campus on sexual assault prevention and awareness and bystander intervention.

Alcohol and Other Drug Education Classes/Modules

These classes are a brief alcohol and marijuana-use-prevention program aimed to help students identify the risks associated with substance use and equip them with effective strategies and education to reduce the risk and harm associated with drinking and smoking.

Bicycle Patrol Program

The Curry College Department of Public Safety utilizes bicycle patrols throughout the spring, summer, and fall months on campus and during large scale events. Officers assigned to this unit have attended a three-day police mountain bicycle patrol school called C.O.B.W.E.B. These officers provide high visibility for the safety of the College community and can patrol areas of campus that are difficult to patrol by vehicle.

Facilities Survey

Comprehensive surveys of exterior and interior lighting, emergency telephones, doors and grounds are conducted by Public Safety and Buildings & Grounds monthly. All recommendations are documented and submitted to Buildings & Grounds for corrective action.

Crime Prevention Through Environmental Design (CPTED)

A less obvious safety program is Crime Prevention through Environmental Design. The principles of CPTED are: Natural Surveillance, Access Control, Territorial Reinforcement, and Maintenance. Following these principles enhances the community and aesthetic qualities of the campus and increases overall safety.

Behavioral Intervention Team (BIT)

The purpose of the Behavioral Intervention Team (BIT) is to proactively identify students whose behavior raises health or safety concerns for themselves or others and to make recommendations for a course of action to the Vice President of Student Affairs/Dean of Students Office or other campus official as appropriate. The goal of the team is to promote student health, safety, and success.

Sexual Assault and Dating/Domestic Violence Education

Curry College offers a variety of different courses, classes and events regarding the subjects of Sexual Assault and Dating/Domestic Violence. More information on these programs can be found on page 40 of this report.

Monitoring of Off Campus Student Organizations

Curry College requests information from local police jurisdictions in relation to criminal activity by students at non-campus locations that are used by officially recognized by the College. At this time, the College recognizes The Canton Ice House located at 65 north St. Canton MA.

Curry SAFE App

The Curry SAFE App is a free mobile app available in both the Apple App Store and Google Play Store. Unlike our emergency notification system, RAVE, users must download and install the app on their own. Parents, family, and friends are also able to download and use the app. The app has some

great safety features such as Mobile Blue Light, Friend Walk, Virtual Escort, Chat, and other safety resources. The app is monitored in real time in our dispatch center 24/7/365.

Mobile Blue Light

This function serves as a mobile blue light or panic button right on your phone. Ensure you have GPS location services turned on and a single press will connect you instantly with Dispatch. Your location will pop up on the monitor and public safety resources will respond to your location immediately.

Virtual Escort

The virtual escort feature allows you to set a start and end point for any destination on campus. Using the GPS location of your device it will calculate how long the journey should take and your location will be monitored live. If you go past the predetermined time limit public safety resources will respond to your location, so be sure to click end when you have completed your journey.

Friend Walk

Similar to the virtual escort except instead of dispatch monitoring your location, you choose your own contact to watch you in real time.

Chat Feature

The app allows you to chat directly with dispatch discreetly from your device. Need to report something anonymously? Can't pick up the phone and call but want to connect with Public Safety? Or maybe you just have a safety related question. No AI, or bots, you will chat live with a member of Public Safety 24/7/365.

Safety & Emergency Resources

The app also contains links to helpful resources about safety and emergency preparedness on campus that can be found in one concise location.

Residence Hall Safety

The College's policy is that all exterior doors to student residence halls are to remain locked 24 hours a day. An electronic computerized card access system allows access through exterior doors. Cards are issued to resident students and are programmed to allow access into the residence halls. In addition, certain personnel, including designated staff members from Buildings and Grounds, Public Safety, and Student Affairs, may have access to the residence halls. Students should report all missing and lost cards as soon as possible to the Department of Public Safety. All reported missing and lost cards are removed from the card access system and a replacement card will be issued. All overnight guests of students must register with Residence Life through the Residence Life Guest Registration Program.

Although the residence halls at Curry College are generally very safe environments, they are not without crime. Most crimes within residence halls involve Larceny/Theft of personal property.

Very few of these crimes involve forced entry/Burglary into a room, and most offenses are "crimes of opportunity." Although residence halls are restricted to residents and authorized guests, not everyone respects the law. Therefore, CCDPS strongly encourages students to always be security conscious.

We recommend you follow these tips to help you from falling victim to crime both on campus and at home:

- Do not prop open locked residence doors.
- Lock your door when sleeping or using the bathroom.
- Lock your room when leaving a roommate asleep inside.
- Lock your door when you leave, regardless of the length of time you plan to be gone.
- Beware of "Tailgating." Tailgating is when a person follows closely behind a resident/person into a secured or locked facility without permission and without being identified. Report any of these incidents to Public Safety.
- Keep small items of value, such as wallets, money, jewelry, electronics etc. out of plain view. Engrave all valuable items with a personal identifying code (your own lettering/numbering system). Keep a record and photograph of all valuables noting descriptions and serial numbers.
- Mark all clothing with a laundry pencil or permanent markers, in a place other than the label.
- Do not leave notes on your door announcing that no one is present.
- Do not place decals on your door announcing your full name or phone number.
- Do not sign in overnight guests whom you do not know.
- Do not allow strangers into your room.
- Request identification and authorization from maintenance staff requesting to remove furniture or to make repairs in your room.
- Never lend your room key, Curry I.D. card to anyone, and never have your room keys duplicated.
- Report all thefts immediately to Public Safety at (617) 333-2222.
- Report any lock, door, or windows that need repair to Residence Life staff.

- Be suspicious of unknown persons loitering or checking doors in your hall. Note their descriptions and call Public Safety immediately.
- Do not invite people you “meet” on the Internet to your room or to stay overnight in your room.

To find out more about Curry Colleges residence halls, refer to [The Office of Residence Life website](#).

Curry College Alcohol Policy

All people on Curry College property are expected to comply with federal, state, and local laws regarding possession, use, and distribution of alcohol. The possession or use of alcoholic beverages is restricted to those persons age 21 or older. People under the age of 21 regardless of the age of other people present, may not possess, use or distribute alcoholic beverages or be in attendance where alcohol is present.

The possession or presence of empty alcohol containers is prohibited in rooms where people are under the age of 21 and will be viewed as evidence of possession or consumption of alcoholic beverages. People of legal drinking age may have in their possession no more than the following amounts of alcohol at any given time: twelve, 12oz. cans of beer, or one 750ml. bottle of wine, or one pint of hard liquor up to 80 proofs. The amount of alcohol in a room is limited to the number of occupants present in the room (e.g., a suite with six occupants, each resident of that suite may possess 12 beers limiting the total amount of alcohol allowed in the suite at any given time to 72 beers regardless of the number of guests).

Common source alcohol containers and paraphernalia (kegs, beer balls, funnels, etc.) are prohibited. Open containers and/or consumption of alcohol in public areas (bathrooms, hallways, lounges, outside, etc.) is prohibited. Public intoxication on the Curry College campus or at Curry College sponsored activities is prohibited. Intoxicated persons will not be permitted entrance to college sponsored activities. Intoxicated people may be transported to the hospital for emergency care if deemed necessary. All costs for transportation and treatment will be borne by those people who are intoxicated, people who are disorderly or disrespectful to Curry College staff, or who fail to comply with the directives of same, may be subject to disciplinary actions.

Providing alcohol to people who are not of legal age is prohibited. The commercial delivery of alcoholic beverages to the College mailroom is prohibited. Participation in drinking games as well as the use of funnels, beer bongs, and similar products is prohibited. Possession and/or consumption of alcoholic beverages is prohibited on the North and Center side of campus as well as on any South side residences that are designated as "dry." Driving under the influence of alcohol on campus is prohibited and offenders are subject to arrest because of this conduct.

Curry College Drug Policy

All people on Curry College property are expected to comply with federal, state, and local laws concerning controlled substances and the possession and use of all prescription medication.

All prescription medication must be stored in the original container with the original label affixed by the pharmacist showing all details as described in M.G.L Chapter 94 Section 21, including patient's name, name of medication, and directions for use. Any other method of storage of prescription drugs may be considered to constitute abuse of the medication or intent to distribute.

Curry College prohibits the possession and or use of a controlled substance and or the misuse of prescription medication or being in the presence of such activity. Curry College is subject to the Drug-Free Workplace Act of 1988 and the Drug-Free Schools and Communities Act amendment of 1989, which prohibit controlled substances on campus.

In 2016, Massachusetts legalized the growth, possession and personal recreational use of marijuana by adults 21 years of age or older. As a recipient of federal funding, however, Curry College must comply with current federal drug laws that still classify marijuana as a controlled substance and prohibit use and possession. Federal law classifies marijuana as an illegal controlled substance and, therefore, all uses of marijuana, including medicinal marijuana, are a violation of federal law and thus possession and use of medical or recreation marijuana is prohibited on campus. Accordingly, Curry College continues to prohibit the use, possession, cultivation and sale of marijuana on all College property and at all College-sponsored activities, whether on or off-campus.

Additionally, a prescription for the use of medical marijuana does not serve as an exemption from this policy. If a student has a written medical certification from a qualified physician pertaining to the prescribed use of medical marijuana, the student may schedule an appointment with the Office of Disability Services to engage in an interactive process regarding reasonable alternatives to a request to use marijuana.

The possession and or use or attempted use of prescription drugs by persons for purposes other than those prescribed by a licensed physician or being in the presence of such activity is prohibited. The sale, attempted sale, distribution and/or attempted distribution of controlled substances including prescription medications or being in the presence of such activity is prohibited. The possession and/or use of drug paraphernalia or being in the presence of such activity is prohibited.

Health Risks of Alcohol and Drugs

ALCOHOL: Loss of concentration and judgment, slowed reflexes, disorientation leading to higher risk of accidents and problem behavior, risk of liver and heart damage, malnutrition, cancer and other illnesses, and can be highly addictive to some people.

AMPHETAMINES: Can cause rushed, careless behavior – pushing beyond your physical capacity, leading to exhaustion; tolerance increases rapidly; causes physical and psychological dependence; withdrawal can result in depression and suicide; continued high doses can cause heart problems, infections, malnutrition, and death.

CANNABIS: Causes permanent damage to lungs, reproductive organs and brain function; slows reflexes; increases forgetfulness; alters judgment of space and distance.

COCAINE: Causes damage to respiratory and immune systems; induces malnutrition, seizures and loss of brain function. Some forms (such as “crack”) are highly addictive.

HALLUCINOGENS: (PCP, LSD, Ecstasy) Causes extreme distortions of what’s seen and heard; induces sudden changes in behavior, loss of concentration and memory; increases risk of birth defects in user’s children; overdose can cause psychosis, convulsions, coma, and death. Frequent use can cause permanent loss of mental function.

NARCOTICS: (Heroin, Morphine, Opium, Codeine) Tolerance increases rapidly; causes physical and psychological dependence; overdose can cause coma, convulsions, respiratory arrest, and death; leads to malnutrition, infection and hepatitis; sharing needles is a leading cause of the spread of HIV and Hepatitis; highly addictive.

SEDATIVES: Tolerance increases rapidly; produces physical and psychological dependence; causes reduced reaction time, and confusion; overdoses can cause coma, respiratory arrest, convulsions, and death; withdrawal can be dangerous; in combination with other controlled substances can quickly cause coma and death.

Medical Amnesty Policy (*Curry Can Call!*)

The health, safety, and wellbeing of community members are a primary concern of the College. The College strongly encourages community members to call for help if they or another individual needs medical assistance for any reason. Please contact Public Safety at (617) 333-2222 (or 911 if off campus) and remain with the individual who needs medical assistance until help arrives. This includes situation where individual needs medical assistance because of consumption of alcohol or other drugs and is exhibiting signs of potential alcohol poisoning or overdose.

As a community of care, we value the action of students positively intervening towards others. We do not want students to be reluctant to call for help due to the fact they themselves are under the influence of alcohol or other drugs. If a student is under the influence of alcohol or other drugs and calls for help and remains with the individual until help arrives, the Office of Community Standards and Accountability will recognize the importance of the call, and the caller will not typically receive a conduct record for being under the influence or in possession of alcohol or other drugs.

Such situations will be handled on a case-by-case basis and determined by the Office of Community Standards and Accountability.

All members of the CCDPS are trained in the use of and carry with them Naloxone (Narcan) which can reverse an overdose caused by opioids if given to the individual in a timely manner. The CCDPS encourages community members to also get trained in the use of Narcan and obtain free doses to increase our community of care.

Alcohol and Drug Abuse Treatment Services Available

The college helps with confidential counseling. Students, faculty, and staff are encouraged to refer students who appear to be affected by drug or alcohol use to one of these resources. For students, counseling is available through the [Counseling Center](#) (617-333-2182) as well as for referrals for off-campus resources. Students who are concerned about their own or other's use of such substances may seek advice and counsel from appropriate college resources without fear of breach of normal rules of confidentiality or fear of punishment. In addition to the services mentioned above, several national hotlines can provide information and referral:

Information on Local 12-Step Meetings and Self-Help Programs:

- [Alcoholics Anonymous, Eastern MA Central Service](#) (617) 426-9444
- Al-Anon and Ala-teen, Massachusetts (888)-425-2666
- Narcotics Anonymous (800) 481-6871
- Marijuana Anonymous (800) 766-6779
- National Alcohol and Drug Abuse 24-Hour Helpline (800) 252-6465
- Smart Recovery (866) 951-5357
- Addiction Center (877) 671-1439

Sanctions for Violations of Alcohol and Drug Policies/Laws

College Sanctions

The violation of Curry College policies and rules regarding alcohol and drugs will be subject to campus disciplinary review and action as follows:

➤ Faculty and Staff

Disciplinary action will be taken as per applicable collective bargaining agreements and College policy up to and including termination of employment.

➤ Students

Disciplinary action will be taken by the Office of Community Standards and Accountability. Sanctions range from counseling and/or referral to a substance abuse educational/intervention programs up to Expulsion. A full list of sanctions can be found in the [Student Handbook](#)

Legal Sanctions

In severe cases, violations of laws and ordinances may result in misdemeanor or felony convictions accompanied by the imposition of legal sanctions which include, but are not limited to, the following:

- Imprisonment
- Forfeiture of personal and real property.
- Denial of federal benefits such as grants, contract, and student loans. Loss of driving privileges.

- Required attendance at substance abuse education or treatment programs.

A full description of federal sanctions for drug felonies can be found here:

www.fas.org/sgp/crs/misc/RL30722.pdf

[Massachusetts Liquor laws and penalties.](#)

[Massachusetts controlled substance laws and penalties.](#)

[Massachusetts Marijuana Laws](#)* **Applies to off campus only. Curry College is subject to the Drug-Free Workplace Act of 1988 and the Drug-Free Schools and Communities Act amendment of 1989.*

Employee Reporting Requirement

Under the Drug Free Schools and Communities Act Amendments of 1989, a faculty or staff member employed under a federal grant or contract must notify the Curry College Human Resources Department in writing, of his or her arrest or conviction for violation of any criminal drug statute occurring in the workplace or while conducting business related to the College no later than five days after such arrest or conviction.

Restrictions on Weapons/Dangerous Items

The possession of firearms, ammunition and any weapons including but not limited to knives, martial arts weapons, guns (including BB, pellet and paintball), police defensive equipment, slingshots, and launching devices, and all firearms and other weapons prohibited by M.G.L. c.269, §10 are prohibited on any College owned property. This definition also extends to any projectile objects, gunpowder and other explosives or potentially dangerous objects.

The above prohibitions shall not apply under the following exemptions:

1. Curry College employees who are authorized by the College to possess and or use such weapons, devices or substances in relation to their official duties
2. Law Enforcement officials or other non-College employees who are authorized by their employers to possess or use such weapons, devices or substances in the performance of their official duties. (e.g., Armored truck driver)
3. People who possess or use such weapons, devices or substances in connection with a scheduled educational, recreational or training program authorized by the College
4. A special waiver signed by the Director and Chief of Public Safety based on extraordinary circumstances. Any such waiver must be in writing and must define its scope and duration.

This policy applies to all Curry College employees, students and campus visitors.

The Department of Public Safety and the Office of Community Standards and Accountability have overall responsibility for implementing and enforcing this policy. Offenders of this policy are subject to the Community Standards process and or arrest.

Robbery Prevention

The crime of robbery can be a very frightening ordeal as a victim. Robbery is the act of larceny to a person using or threat of using violence/force. A key component to this crime is that the victim is in fear that he or she may be subject to bodily harm or death. Should you ever find yourself falling victim to robbery the most important thing you can do, if possible is to prevent any violence. Always assume- that the offender is armed and willing to use force. There are some steps you can take to make yourself less of an attractive target to potential offenders.

The following list of tips below has been adopted from the Town of [Wellesley Police Department](#). These tips offer great preventive and response measures you can take.

Prevention Tips

- ✓ Be aware of your surroundings. Walk with a purpose, head up, and looking around. Stay in lighted areas at night. The robber doesn't want to be seen.
- ✓ Stay with the crowd — there is safety in numbers.
- ✓ Women should carry their wallet in their pocket, not their purse. If you carry a purse, carry it close to your body, like a football player carries a football. Do not place the strap across your body or over your shoulder. When the robber grabs your purse, you may be pulled along with the robber until the strap breaks and you are injured.
- ✓ Don't leave a purse on a counter or in a shopping cart unattended.
- ✓ Be cautious when wearing "flashy" jewelry.
- ✓ Be conscious of people just "hanging around" anywhere, especially near pay phones, public restrooms, building entrances and garages.
- ✓ Notify the police of strangers who are hanging around your home, apartment or place of business for no apparent reason.
- ✓ Take the profit out of robbery by not carrying large sums of money, or credit cards on your person whenever possible.
- ✓ Vary your routine — don't do the same thing at the same time every day.
- ✓ Be aware of people around you when you are using your automatic teller machine (ATM) card. When possible, use an ATM that is located inside a business such as a grocery store.
- ✓ Have your pay, social security, or retirement checks directly deposited into your bank account.
- ✓ When you go to the bank, don't flash your cash.

- ✓ Lock your car doors when your vehicle is unattended even if you will only be out of it for a "minute." This action may prevent a robber from hiding in your back seat awaiting your return.
- ✓ While driving, keep your vehicle doors locked.
- ✓ If you are walking and a vehicle is following you, reverse directions or cross the street.
- ✓ If someone acts suspiciously, looks at you closely or follows you, head for bright lights and people and call the police.
- ✓ Carry a whistle or other noise making device. Use it to call attention to yourself if threatened.

What Should I Do if I am a Robbery Victim?

- DO NOT PANIC — get a grip on yourself and stay calm. Take some deep breaths.
- DO NOT RESIST — the robber wants your valuables, not you. "Things" can always be replaced ... you cannot.
- OBEY THE ROBBER'S INSTRUCTIONS — listen closely to what the robber says and do not argue. Try to remember the exact words spoken by the robber as it may help with the police investigation.
- BE ALERT — notice what is happening.
- LOOK FOR DISTINGUISHING CHARACTERISTICS — look for things that cannot be changed such as scars, marks, tattoos, limps, accents, etc.
- WEAPONS — take careful note of any weapons. You will have to describe it later to the police. If the robber indicates that there is a weapon in his pocket, assume it is a gun. If the robber has a gun, assume it is loaded.
- DESCRIPTION OF ROBBER — compare the robber to your own height and weight to estimate the size of your attacker.
- COOPERATE WITH THE POLICE — if you are robbed, or see someone else being robbed, report it to the police *immediately*.

What Should I Do After the Robbery?

- Notify the police immediately and be prepared to tell them:
 1. The address, with an exact location in the building.
 2. As complete a description as possible of the robber(s).

3. Whether or not a weapon was implied or used. If you saw the weapon, a good description including the type, for example, if it was a handgun what style (revolver or semi-automatic), or other weapons such as knives, crowbars, etc.
 4. A description of any vehicle used and the number of people in the vehicle; The direction of travel; and, any words spoken by the robber(s).
- While waiting for the police to arrive, lock the doors and *do not touch anything*. Keep everyone away from the hold-up area and guard anything that may have been touched by the robber(s).
 - Save anything left behind by the robber(s) such as a note, weapon, bag, clothing and do not handle any of these items.
 - While waiting for the police, *do not discuss the crime with other witnesses*. All those involved should make individual notes of the information they have while it is fresh in their minds.

Sexual Assault and Dating Violence Prevention & Education Programs

Curry College prohibits dating violence, domestic violence, sexual assault and stalking, as they are defined for purposes of the *Clery Act*. New students and new employees are provided with primary prevention and awareness programming aimed at preventing sexual assault, dating violence, domestic violence, and stalking through online education programs and in-person orientation sessions.

The College provides programs and opportunities to educate students, staff, and faculty about sexual violence, dating violence, domestic violence, and stalking prevention. This is done within the context of wellness-based education and intervention. Through collaboration with students, faculty, and staff, a comprehensive prevention program is offered focusing on the health and safety of Curry College students.

Institutional prevention and awareness campaigns for students and employees include strategically branded print and electronic materials, including resource cards, posters, a robust website, social media posts and extensive in-person programming. Ongoing prevention and awareness programs and educational opportunities identify domestic violence, dating violence, sexual assault and stalking as prohibited conduct; define what behavior constitutes domestic violence, dating violence, sexual assault, stalking, and consent to sexual activity; provide safe and positive options for bystander intervention that may be carried out by an individual to prevent harm or intervene when there is a risk of dating violence, domestic violence, sexual assault or stalking; and provide information on risk reduction to help individuals and communities address conditions that facilitate violence, decrease perpetration and increase empowerment for victims in order to promote safety.

Such programs include: in-person training and education, educational outreach during campus-wide events, such as a large-scale “Consent Day” program; bystander intervention training for students, including student leaders and all resident assistants, and new students at fall orientation through an interactive theater production; and risk-reduction strategies designed to promote healthy decision-making; classroom-based presentations; residence hall passive and active programming, educational meetings, courses, and workshops for students who may be sanctioned as part of the Community Standards process.

Massachusetts Sex Offender Registry

The Sex Offenders Registration and Notification Act (SORNA) required the Commonwealth of Massachusetts to establish sex offender registration and notification programs. Sex offender registration is used for monitoring and tracking sex offenders after they are released back into the community. The Sex Offender Registry provides important information about convicted sex offenders to local, state and federal authorities as well to the public. The registry contains names, current residences and past offenses of registered offenders and can be found at [The Massachusetts Sex Offender Registry website](#).

Sexual Misconduct Policy

(Section Revised and Effective August 2026)

I. PREAMBLE

Curry College (“Curry”) commits itself to providing a community of mutual trust and respect for students, faculty, and staff. Therefore, sexual misconduct will not be tolerated. Such behavior seriously undermines the achievement of Curry’s mission and its effectiveness as an educational institution and workplace. As a community dedicated to the care and respect of all its members, Curry expects every person to play a vital role in the creation and maintenance of an environment free from sexual misconduct. In addition to taking a strong stance against such conduct, a community of care and respect promotes and encourages appropriate attitudes and practices among its members. The purpose of this policy is to promote an environment free of sexual misconduct by educating the community, vigorously investigating reports of such behavior in a manner that is expeditious and sensitive to the needs and rights of both parties, and taking steps to prevent recurrence and correct any discriminatory effects on members of the Curry community.

II. DEFINITIONS

Complainant: an individual who is alleged to be the victim of conduct that could constitute a violation of this policy.

Employee: any person, whether or not also incidentally a student, who is currently employed by Curry but does not include independent contractors. The term employee will also include:

- Applicants for employment
- Employees currently on paid or unpaid leave, whether administrative leave, sabbatical, or other type of approved leave

Reporter: means a person who reports a potential policy violation to the Title IX Coordinator and can be a person other than the Complainant.

Respondent: means an individual who has been reported to be the perpetrator of conduct that could constitute a violation of this policy.

Sexual Misconduct: Prohibited Conduct that is defined in Section IX of this policy.

Student: means any individual who has applied for admission, paid a deposit, registered,

or entered any other contractual relationship with Curry College for any form of instruction, whether for credit, including those in the undergraduate, graduate, and certificate programs. For purposes of this policy, “student” status begins at the time of such application, payment, registration, or contractual undertaking, even if the student has not yet arrived on campus or commenced instruction and continues until such time as the student graduates or otherwise completes the relevant program, formally and permanently withdraws, or is expelled. A student who has taken a leave of absence, is on a medical leave, or has been suspended continues to be considered a “student” for purposes of this policy.

III. SCOPE

This policy prohibits sexual misconduct committed by a member of the Curry community. Curry community members include students, trustees, alumni, faculty, administration, staff, visitors, volunteers, independent contractors, and any individual regularly or temporarily employed, studying, living, visiting, conducting business, or having any official capacity at Curry.

This policy applies to conduct occurring on Curry College property, or at or within college sanctioned events or programs that take place off-campus, including study abroad, community-based learning, and internship programs. This policy also applies to off-campus conduct, including the use of technology off-campus, that violates this policy if such conduct may have substantial adverse effect on any member of the Curry community.

This policy applies to conduct by a student, even if it occurs outside of an academic term or when the student is not otherwise enrolled in a course at Curry College (e.g., during summer or holiday break, or participating in a non-Curry study away program).

Moreover, Curry College continues to administer the policy with respect to any such conduct by a student even if the student subsequently graduates, withdraws, takes leave, or is otherwise absent from Curry College, and even if Curry College does not learn of such conduct until after the student graduates, withdraws, takes leave, or is otherwise absent from Curry.

Curry College also continues to administer the policy with respect to any conduct by an employee if the employee subsequently leaves the college, even if Curry College does not learn of such conduct until after the employee leaves the college.

Any Curry employee who is also taking a class or classes at the college will be considered an employee for the purposes of this policy.

Questions about this policy should be directed to Curry College's Director of Title IX and Institutional Equity (office located in the King Administration building, G04):

TitleIX@curry.edu 617-333-2394

IV. CURRY'S STATEMENT OF COMPLIANCE WITH TITLE IX AND THE VIOLENCE AGAINST WOMEN REAUTHORIZATION ACT OF 2013

Curry College is subject to the provisions of Public Law No. 92-318, Title IX of the Education Amendments of 1972, 20 U.S.C. §§ 1681 et seq., and the regulations promulgated thereunder (34 C.F.R. Subtitle A, Part 106), which prohibit discrimination on the basis of sex in any education program or activity receiving federal financial assistance. Sexual and gender-based harassment, which includes sexual violence, is a form of sex discrimination. Curry will not tolerate any type of sexual harassment, sexual violence, relationship violence, or stalking. Section 304 of the Violence Against Women Reauthorization Act of 2013 prohibits sexual assault, dating violence, domestic violence, and stalking. These behaviors are sometimes a form of sex discrimination or harassment but will always be resolved under this policy even where not based on sex or gender.

V. EDUCATION

Education and training are a key component of creating an environment free from sexual misconduct. Curry College is therefore committed to providing effective educational and training programs implementing this policy to all students, faculty, and staff.

This policy is located online and described in other informational brochures as appropriate. Such materials are available in the offices of Student Affairs, the Provost, Residence Life, Public Safety, Human Resources, and the Student Health and Counseling centers.

Educational programs on sexual misconduct and this policy will be provided for all new students, including transfer, graduate, post-baccalaureate, continuing education, and certificate program students. Whenever possible, this will occur within the first four weeks of each semester.

Sessions for first-year students will occur during orientation or in other first-year programs. Educational sessions will also be included in Residence Life programs. Training and education in this policy will be provided for all new faculty and staff, and for resident assistants (RAs). Periodic refresher programs will also be provided for all faculty, staff, and RAs. Individuals with specific responsibilities described in this policy will receive additional training as required to fulfill those responsibilities effectively.

Curry's programs to prevent dating violence, domestic violence, sexual assault, and stalking are described in more detail in Appendix C to this policy.

VI. CLASSROOM MATERIALS AND CONTENT

Complaints under this policy that classroom materials, projects, or classroom discussions are offensive because they include references to sexual terms are to be evaluated with due regard to principles of academic freedom.

Consistent with those principles, course content and Updated August 2026 Sexual Misconduct Policy 6 teaching methods remain the province of individual faculty members. However, content or methods that focus attention on sexual terms or characteristics not germane to the academic discussion or on sexual characteristics of individual students, faculty, or staff are inappropriate, and may constitute sexual harassment and a violation of this policy. In such situations, Curry would investigate the matter in accord with its policies.

VII. PRIVACY AND CONFIDENTIALITY

A. Privacy

Curry is committed to protecting the privacy of all individuals involved in making a report or complaint under this policy and will make every effort to protect the privacy

interests of all such individuals in a manner consistent with the need for a thorough review of the allegations. Privacy generally means that information related to a report of misconduct will only be shared with a limited circle of individuals.

The use of this information is limited to those college employees who “need to know” in order to assist in the active review, investigation, or resolution of the report or complaint. While not bound by confidentiality, these individuals will be discreet and respect the privacy of all individuals involved in the process. Reporters should also be aware that Curry may be required to disclose information in response to legal process or when Curry’s need to protect the safety of others outweighs privacy concerns.

B. Confidentiality

Often a person reporting or otherwise concerned about sexual misconduct wants a discussion to be confidential or off the record. Confidential discussions may be available from persons who, by law, have special professional status, which at Curry include Curry’s Director of Spiritual Life, and all staff at within Health Services and the Counseling center.

The level of confidentiality depends on what legal protections are held by the specific people receiving the information and should be addressed with them before specific facts are disclosed.

C. Other Employees’ Reporting Obligations

All College employees (faculty and staff) must promptly notify the Title IX Coordinator, or designee, about possible sexual or gender-based harassment, with limited exceptions. On-campus resources who can maintain confidentiality and are therefore not required to report discrimination or harassment to the Title IX Coordinator are Curry’s Chaplain and all staff at within Health Services and the Counseling Center.

Adherence to this reporting obligation ensures that Curry can connect affected individuals with appropriate resources and services; track incidents and identify patterns; and, where appropriate, take steps to protect the Curry community. Updated August 2026 Sexual Misconduct Policy 7 All actions taken to investigate and resolve

complaints shall be conducted with as much privacy and discretion as possible without compromising the thoroughness and fairness of the investigation. Curry will not disclose the identity of a complainant or respondent, except as necessary to carry out a disciplinary process or as permitted under state or federal law.

All persons involved are to treat the situation with respect and as confidentially as possible. To conduct a thorough investigation, the Investigator(s) and/or Title IX Coordinator may discuss the complaint with witnesses and those persons involved in or affected by the complaint, and those persons necessary to assist in the investigation or to implement appropriate remedial action

VII. EFFECTIVE CONSENT

Effective consent is informed, knowing and voluntary. Curry defines effective consent as mutually understandable words or actions which indicate willingness to participate in mutually agreed-upon sexual activity.

Effective Consent cannot be given by minors (in Massachusetts, those not yet sixteen (16) years of age). Effective Consent cannot be given by individuals who have a mental disability that results in them being unable to provide informed, knowing and voluntary consent. Effective Consent cannot be given by those who are unconscious, unaware or otherwise physically helpless.

Consent obtained as a result of physical force, threats, intimidation (implied threats), duress or coercion is not Effective Consent. A person who knows or should reasonably have known that another person is incapacitated may not engage in sexual activity with that person, and there can be no Effective Consent in such situations.

Effective Consent cannot be given by those who are incapacitated as a result of alcohol or other drug consumption (voluntary or involuntary). In addition, incapacitation may result from mental disability, sleep, or involuntary physical restraint, and there can be no Effective Consent in such situations.

A. Force

Force is the use or threat of physical violence to overcome an individual's freedom of will to choose whether or not to participate in sexual activity. There is no requirement that a party resists the sexual advance or request, but resistance will be viewed as a clear demonstration of non-consent. Examples of force or a threat of harm include using physical force or a threat, express or implied, that would place a reasonable person in the Complainant's situation in fear of physical harm to themselves or another person.

B. Coercion

Coercion is the use of pressure to compel another individual to initiate or continue sexual activity against an individual's will. Coercion can include a wide range of behaviors, including intimidation, manipulation, threats, and blackmail. A person's words or conduct are sufficient to constitute coercion if they wrongfully impair another individual's freedom of will and ability to choose whether or not to engage in sexual activity. Examples of coercion:

- Threatening to "out" someone based on sexual orientation, gender identity, or gender expression if the person does not engage in sexual activity
- Threatening to harm oneself if the other party does not engage in the sexual activity
- Repeatedly pressuring someone to engage in sexual activity after the person has indicated that they do not want to engage in such activity

C. Incapacitation

Under this policy, a person is considered incapable of giving consent, or "incapacitated," if their judgment is substantially impaired by drugs, alcohol, or some other physical or mental condition.

Indications of consent are irrelevant if the person is incapacitated. Engaging in sexual activity with someone who a reasonable person would determine to be incapacitated constitutes sexual misconduct and violates this policy.

Examples of incapacitation include, but are not limited to, being passed out, asleep, unable to communicate, or intoxicated at a level that substantially impairs judgment.

Physical indicators of incapacitation may include:

1. Slurred speech
 2. Unsteady gait or stumbling
 3. Vomiting
 4. Unfocused or bloodshot eyes
 5. Outrageous or unusual behavior
 6. Expressed memory loss
 7. Disorientation
 8. Unresponsiveness
- Consumption of drugs or alcohol by the Respondent does not relieve a party of responsibility to obtain ongoing consent.

IX. PROHIBITED CONDUCT

Prohibited Conduct includes the following:

A. Title IX Sexual Misconduct

Title IX Sexual Misconduct is conduct on the basis of sex against a person in the United States, occurring within the context of an education program or activity, which satisfies one or more of the following definitions:

1. Quid Pro Quo Harassment: A Curry employee conditions the provision of an aid, benefit, or service of the Curry on a person's participation in unwelcome sexual conduct.

2. Sexual Harassment: Unwelcome conduct that a reasonable person would determine to be so severe, pervasive, and objectively offensive that it effectively denies a person equal access to the Curry's education program or activity.

3. Sexual Assault: Any sexual act directed against another person, without that person's consent (including instances where the victim is incapable of giving consent), and includes each of the following:

- a. Forcible Rape: (i) sexual intercourse, or (ii) oral or anal sexual intercourse, or (iii) use of an object or instrument to unlawfully penetrate, however

slightly, the genital or anal opening of the body of another person, either (A) forcibly and/or against that person's will, or (B) against the person's will in instances where the victim is incapable of giving consent because of his/her youth or because of his/her temporary or permanent mental or physical incapacity;

b. Fondling: touching of the private body parts of another person for the purpose of sexual gratification, forcibly and/or against that person's will or not forcibly or not against the person's will in instances where the victim is incapable of giving consent because of his/her youth or because of his/her temporary or permanent mental or physical incapacity.

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

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

4. Dating Violence: Violence committed by a person who is or has been in a social relationship of a romantic or intimate nature with the victim; and where the existence of such a relationship shall be determined based on a consideration of (a) the length of the relationship, (b) the type of relationship, and (c) the frequency of interaction between the persons involved in the relationship.

5. Domestic Violence: Felony or misdemeanor crimes of violence committed by a current or former spouse or intimate partner of the victim, by a person with whom the victim shares a child in common, by a person who is cohabitating with or has cohabitated with the victim as a spouse or intimate partner, by a person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction receiving grant monies, 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 jurisdiction.

5. **Stalking:** Engaging in a course of conduct directed at a specific person that would cause a reasonable person to (a) fear for his, her or their safety or the safety of others; or (b) suffer substantial emotional distress.

B. Non-Title IX Sexual Misconduct

“Non-Title IX Sexual Misconduct” is a broad, non-legal term that encompasses a wide range of behaviors that are prohibited by this Policy or federal and state law, including but not limited to, sexual harassment, sexual assault, rape, acquaintance rape, stalking, and relationship violence (including dating and domestic violence). Non-Title IX Sexual Misconduct includes conduct occurring both on-campus and off-campus, if the conduct was in connection with a College or College-recognized education program or activity, or if the conduct may have the effect of creating a hostile environment for a member of the Curry community.

It is a violation of College Policy and/or applicable law to commit or to attempt to commit any of the acts listed below.

1. Sexual Assault: Actual or attempted sexual contact with another person without that person’s consent that includes, but is not limited to:

- Intentional touching of another person’s intimate parts without that person’s consent; or
- Other intentional sexual contact with another person without that person’s consent; or
- Coercing, forcing, or attempting to coerce or force a person to touch another person’s intimate parts without that person’s consent; or
- Rape, which is penetration, no matter how slight, of (1) the vagina or anus of a person by any body part of another person or by an object, or (2) the mouth of a person by a sex organ of another person, without that person’s consent.

See Section III for the definitions of consent, incapacitation, and force.

2. Sexual Harassment: Unwelcome conduct of a sexual nature that has the effect of creating a hostile or stressful living, learning, or working environment, or whenever toleration of such conduct or rejection of it is the basis for an academic or employment decision affecting an individual. Conduct is considered “unwelcome” if the person did not request or invite it and considered the conduct to be undesirable or offensive.

Sexual harassment includes any conduct or incident that is sufficiently serious that it is likely to limit or deny a student's ability to participate in or benefit from Curry's educational program or activity or a faculty or staff member's ability to work, which may include a single incident of sexual assault or other serious sexual misconduct.

Examples of Sexual Harassment. Sexual harassment can take many forms, and can:

- Occur between equals, such as student to student, faculty member to faculty member, staff to staff, or visitor/contracted employee to staff.
- Occur between persons of unequal power status, such as supervisor to subordinate, faculty member to student, coach to student-athlete, student leader to first-year student. Although sexual harassment often occurs in the context of an exploitation of power by the person with the greater power, a person who appears to have less power in a relationship can also commit sexual harassment (such as a student harassing a faculty member).
- Be committed by an acquaintance, a stranger, or someone with whom the complainant has or has had a personal, intimate, or sexual relationship.
- Occur by or against a person of any sex, gender identity or expression, or sexual orientation

The following non-exhaustive list includes examples of behavior that could be considered sexual harassment:

- Unwelcome sexual innuendo, propositions, sexual attention, or suggestive comments and gestures.
- Unwelcome physical contact of a sexual nature, such as touching, hugging, kissing, patting, or pinching, that is uninvited and unwanted or unwelcome by the other person.
- Humor and jokes about sex or gender-specific traits; sexual slurs or derogatory language directed at another person's sexuality or gender.
- Insults and threats based on sex or gender; and other oral, written, or electronic communications of a sexual nature that a person communicates are unwelcome.
- Written graffiti or the display or distribution of sexually explicit drawings, pictures, or written materials; sexually charged name-calling; sexual rumors

or ratings of sexual activity/performance; the circulation, display, or creation of e-mails or Web sites of a sexual nature.

- Non-academic display or circulation of written materials or pictures degrading to a person(s) or gender group.
- Unwelcome attention, such as repeated inappropriate flirting, inappropriate or repetitive compliments about clothing or physical attributes, staring, or making sexually oriented gestures.
- Change of academic or employment responsibilities (increase in difficulty or decrease of responsibility) based on sex, gender identity, gender expression, or sexual orientation.
- Use of a position of power or authority to: (i) threaten or punish, either directly or by implication, for refusing to tolerate harassment, for refusing to submit to sexual activity, or for reporting harassment; or (ii) promise rewards in return for sexual favors.
- Acts of verbal, nonverbal, or physical aggression, intimidation, or hostility based on sex or sex-stereotyping

Hostile Environment: Unwelcome conduct based on sex that is objectively offensive to a reasonable person and is severe or pervasive.

A hostile environment exists when sexual or sex-based harassment is sufficiently serious to deny or limit a student's ability to participate in or benefit from Curry's programs or activities or has the effect of unreasonably interfering with an employee's work performance or altering the terms and conditions of the employee's employment. A hostile environment can be created by anyone involved in a College program or activity (e.g., administrators, faculty members, students, and campus visitors).

In determining whether sex-based harassment has created a hostile environment, Curry considers the conduct in question from both a subjective and objective perspective. It will be necessary, but not enough, that the conduct was unwelcome to the student who was harassed. Curry will also need to find that a reasonable person in the student's position would have perceived the conduct as undesirable or offensive in order for that conduct to create or contribute to a hostile environment.

To determine whether a hostile environment exists for a student or employee, Curry will consider a variety of factors related to the severity, persistence, or pervasiveness of the sex based harassment, including: (1) the type, frequency, and duration of the conduct; (2) the identity and relationships of persons involved; (3) the number of individuals involved; (4) the location of the conduct and the context in which it occurred; and (5) the degree to which the conduct affected the student's education or the employee's employment.

The more severe the sex-based harassment, the less need there is to show a repetitive series of incidents to find a hostile environment. Indeed, a single instance of sexual assault may be sufficient to create a hostile environment. Likewise, a series of incidents may be sufficient even if the sex-based harassment is not particularly severe.

3. Sexual Exploitation: Occurs when a person takes sexual advantage of another person for the benefit of anyone other than that person, without that person's consent.

Examples of sexual exploitation:

- Prostituting another person;
- Recording images (e.g., video, photograph) or audio of another person's sexual activity, intimate body parts, or nakedness without that person's consent;
- Distributing images (e.g., video, photograph) or audio of another person's sexual activity, intimate body parts, or nakedness, if the individual distributing the images or audio knows or should have known that the person depicted in the images or audio did not consent to such disclosure and objects to such disclosure; and,
- Viewing another person's sexual activity, intimate body parts, or nakedness in a place where that person would have a reasonable expectation of privacy, without that person's consent, and for the purpose of arousing or gratifying sexual desire.

4. Stalking: A course of conduct involving more than one instance of inappropriate and unwanted attention, harassment, threatening or intimidating physical or verbal contact, or any other course of conduct directed at a person that could be reasonably regarded as likely to alarm or place that person in fear of harm or injury, including physical, emotional, or psychological harm. This includes the use of technology to pursue, harass, threaten, intimidate, or otherwise make unwelcome contact with

another person. Stalking may involve people who are known to one another or have an intimate or sexual relationship or may involve people not known to one another.

Stalking is prohibited by Massachusetts law. Stalking can also constitute a violation of this Policy when the conduct involves a Curry student or employee and is gender-based.

Examples of Stalking: The following persistent, unwanted, and repeated harassing conduct may constitute stalking:

- Every time Natalie went to class, Ben, another student, would sit next to her. Ben kept trying to talk to Natalie even though she told him she was not interested in him. Ben then started showing up everywhere that Natalie went — in the lobby of her residence hall, in the Student Center, and at her work-study job. Ben was persistent and threatened to “make” Natalie go out with him. If Ben continues to pursue this conduct, his action may constitute stalking in violation of this Policy.
- David dated Ellen, a graduate student, a couple of times but eventually stopped seeing her. Then Ellen began sending David several e-mails a day, messaging him on Instagram, and sending text messages to his cell phone. David changed his email address and cell phone number, but somehow Ellen discovered his new address and cell phone number and began sending even more e-mails and texts. David really wants Ellen to stop contacting him, but he is not sure what to do. Ellen’s conduct toward David may constitute stalking in violation of this Policy.

5.Relationship Violence (Dating and Domestic): Abuse, violence, or intentionally controlling behavior between partners or former partners involving one or more of the following elements: (i) battering that causes bodily injury; (ii) purposely or knowingly causing reasonable apprehension of bodily injury; (iii) emotional abuse creating apprehension of bodily injury or property damage; (iv) repeated telephonic, electronic, or other forms of communication — anonymously or directly — made with the intent to intimidate, terrify, harass, or threaten. Relationship violence can occur in all types of relationships (e.g., heterosexual, same sex, or any other type of relationship). Relationship violence may constitute a violation of this Policy when it involves a Curry College student, faculty or staff member, and the conduct is gender-based.

Examples of Relationship Violence:

- Tracey's boyfriend Mark yelled at her today because she was late meeting him for lunch. Mark grabbed Tracey's arm and pulled her out of the dining hall. Tracey was embarrassed. Later Mark said he was so sorry for humiliating her. Tracey says things are okay now, but she wonders when it will happen again.
- Zach and James have been dating for a month. Zach, a student, has always been jealous, but now he becomes angry when he does not know where James is. He tells James that he will kill him if he ever cheats on him. Zach also told James that he would kill himself if James ever left him. The other day, Zach slapped James when he was mad at him. James is becoming more and more afraid of Zach, but he feels trapped and does not know what to do.

6.Complicity: Complicity means any act that knowingly aids, facilitates, promotes, or encourages another person to commit any other form of conduct prohibited by this policy.

7. Prohibited or Inappropriate Intimate and Sexual Relationships

A. General

- Persons in positions of power or authority over others should be aware of and sensitive to the problems that may arise from seemingly consensual relationships with their subordinates. The power differential inherent in such relationships may compromise free choice. Any perceived abuse of authority diminishes trust and respect among members of the Curry community. For example, others not involved in the relationship may believe they are being treated or evaluated unfairly as a result of the relationship. Claims of sexual harassment may emerge from the subordinate person in the relationship or from third parties. Accordingly, all members of the Curry community are expected to maintain appropriate professional relations with one another.

B. Relationship with Students

- Curry College specifically prohibits consensual sexual or physically intimate relationships between faculty and students and between staff and students. Such relationships undermine significant educational goals of Curry. Subject to the appropriate approvals, an individual department or office within Curry may

implement more restrictive policies for its employees, according to the special nature and requirements of their employment.

- There may be occasions when a sexual or physically intimate relationship exists before one or both of the individuals in the relationship becomes a faculty member, staff member, or student, such as to violate the prohibition on consensual relationships with students. In such cases, the faculty or staff member in the pre-existing relationship is required to disclose the relationship promptly to either the provost in the case of faculty, or the director of human resources in the case of staff. With the assistance of the provost or director, and in a manner that causes the least detrimental effect for the student, the faculty or staff member shall take steps to remove themselves from the position of power or authority.

C. Relationships Between Faculty and Staff

- Professional Influence or Authority: An individual may be found to have professional influence or authority over a faculty or staff member when that individual supervises or evaluates performance, or recommends or awards salary, reappointment, or promotion, of the faculty or staff member. The existence of professional influence or authority is determined on a case-by-case basis.
- Subject to the appropriate approvals, an individual department or office within Curry may implement more restrictive policies for its employees, according to the special nature and requirements of their employment.
- When a consensual sexual or physically intimate relationship exists or develops between a faculty or staff member and a member of the faculty or staff over whom the faculty or staff member has professional influence or authority, the person with professional influence or authority shall promptly report the existence of the relationship to either the provost in the case of faculty, or the Vice President of Human Resources in the case of staff. With the assistance of the provost or director, and in a manner that causes the least detrimental effect for the other person, the faculty or staff member shall take steps to remove themselves from the position of power or authority. Because such steps may adversely affect the other person in the relationship, may jeopardize the position at Curry of the person with influence or authority, and may inconvenience or cause undue hardship to other members of Curry

community, both parties should be mindful of the potential consequences before entering into a sexual or physically intimate relationship.

- Discipline: Failure to comply with this policy or to self-report the existence of a relationship as required by this policy is in itself considered sexual misconduct and will be subject to the procedures referenced in this policy.

8. Retaliation: Retaliation occurs when Curry or a person intimidates, threatens, coerces, or discriminates against any individual for the purpose of interfering with any right or privilege secured by Title IX or this policy, or because the individual has made a report or complaint, testified, assisted, or participated or refused to participate in any manner in an investigation, proceeding, or hearing relating to a title IX complaint.

Charging an individual with a code of conduct violation for making a materially false statement in bad faith in the course of a grievance proceeding under this part does not constitute retaliation prohibited under paragraph (J) of this section, provided, however, that a determination regarding responsibility alone is not sufficient to conclude that any party made a materially false statement in bad faith.

An example of potential retaliation could be the violation of a supportive measure such as a violation of a “no-contact” order. This will be added as an allegation of misconduct in an updated Notice of Allegations & Investigation.

X. APPLICABILITY OF COMPLAINT PROCEDURES

A. Jurisdiction

The United States Department of Education’s Title IX Regulations, published on May 19, 2020, 85 FR 30026, mandate that Curry use certain procedures in a narrow category of sexual misconduct cases. Reports of Prohibited Conduct under this policy meeting the definitions and jurisdictional requirements of the regulations will follow those procedures—Procedures for the Resolution of Reports Alleging Sexual Misconduct Conduct Falling Within the Scope of Title IX (“Title IX Procedures”). The Title IX Procedures describe the nature of complaints that will be considered under those procedures.

Complaints that fall outside of the jurisdiction of the Title IX Procedures will be addressed as follows:

- All complaints that meet the definition of Prohibited Conduct under the Sexual Misconduct Policy but do not meet the jurisdictional requirements of the Title IX Procedures will be addressed through the Procedures for the Resolution of Reports Alleging Sexual Misconduct Outside the Scope of Title IX (“Non-Title IX Procedures”).
- Complaints that do not meet the definition of Prohibited Conduct under the Sexual Misconduct Policy will be adjudicated through the Student Code of Conduct process (for student Respondents), or an employee or faculty discipline process (for employee and faculty Respondents).

This does not mean that any case is more or less important than another case, but instead a reflection of that fact that federal regulations apply only to a specifically identified set of cases.

B.Making a Report vs. Filing a Complaint

A report is defined as a notification of an incident of a policy violation to the Title IX Coordinator by any reporting person. A report may be accompanied by a request for supportive measures, no further action, and/or to initiate a formal complaint process by filing a complaint. By contrast, the filing of a complaint initiates Curry’s formal investigation process. At the time a report is made, a reporting party does not have to decide whether to file a complaint. Curry recognizes that not every individual will be prepared to file a complaint with Curry and individuals are not expected or required to pursue a specific course of action.

Choosing to make a report and deciding how to proceed after making the report can be a process that unfolds over time. To the extent possible, Curry will respect an individual’s autonomy in making these important decisions and provide support that will assist each individual in making that determination. A report may become a formal complaint, initiated by either the reporting party or Curry, as more fully described in this policy.

To file a complaint, please contact the Title IX Coordinator. Note: Prompt filing of a complaint facilitates a timely resolution of the matter. An individual, such as a former student or former employee who has since left the Curry community, may bring a complaint at any time for alleged

behavior that occurred while the individual was a member of the Curry community, although a significant delay in filing a complaint may limit Curry's ability to conduct a thorough investigation. Similarly, students and employees may also be found responsible under this policy for conduct that is not discovered until after a degree is awarded or employment has terminated.

C.Initial Assessment

Upon receipt of a report from any person of alleged Prohibited Conduct by any person, the Title IX Coordinator will make an initial assessment of the reported information to (1) determine proper jurisdiction and complaint procedures; and (2) respond to any immediate health or safety concerns raised by the report.

The complaint procedures referenced in this policy may be utilized by any Curry employee or student who believes they have been the victim of sexual misconduct as defined in this policy, if such conduct is committed by a Curry employee or student. It is not available for certain complaints for which other procedures exist, specifically, complaints of discrimination, including gender discrimination, that do not constitute sexual misconduct or harassment. Such complaints shall be addressed under the Nondiscrimination Policy and may not be brought under this policy. They should be reported to the Title IX Coordinator.

Curry recognizes, however, that harassment related to an individual's sex, sexual orientation, gender identity, or gender expression can occur in conjunction with conduct related to an individual's race, color, ethnicity, national origin, religion, age, or disability. Targeting individuals because of these characteristics is also a violation of Curry's Non-Discrimination Policy. Under these circumstances, Curry will address such cases together with allegations under this policy, including allegations related to the targeted individual's race, color, ethnicity, national origin, religion, age, or disability. Coordination of the investigation will not delay the prompt and equitable resolution of a report under this policy.

Except as noted below, the following provisions apply to the resolution of complaints under both Title IX and non-Title IX procedures.

XI. PRIVACY OF PROCEEDINGS

Individuals who participate in a proceeding under this policy may share information that they provide or learn during the process with advisors, family members, and other supporters as the individual participant deems necessary. Note, however, that this does not allow individuals to unreasonably share private information in a manner that has the purpose or effect of harming or embarrassing another individual. Such sharing of information may constitute retaliation, which may result in separate charges under this policy or the Student Code of Conduct.

XII. AMNESTY FOR DRUG OR ALCOHOL USE

Curry College encourages reporting of incidents of sexual misconduct. Curry recognizes that a student who has been using drugs or consuming alcohol during or near the time of an incident may be hesitant to make a report or to respond fully during an investigation because of potential consequences under the Code of Conduct for their own behavior. A student involved in informal or formal complaint procedures under this policy, either as reporting party, responding party, or witness, will not be subject to disciplinary action under Curry's Code of Conduct for their own personal consumption of alcohol or drugs at or near the time of the incident, provided that any such violations were not reasonably likely to place the health or safety of any other person at risk. Curry may initiate an educational discussion or pursue other educational remedies regarding alcohol or other drugs to protect the health and well-being of the student.

XIII. CONSULTANTS, ADVISORS, AND LEGAL COUNSEL

- A. Confidential Consultants:** individuals who are concerned about a possible incident of Prohibited Conduct but are unsure of their options and whether or not to report the incident may consult section VII of this policy for information about persons to whom they can speak in confidence. Appendix A also has information regarding sources of support on and off-campus.
- B. Advisors:** Both parties are entitled to be accompanied at any meeting or part of the informal or formal proceedings by an advisor of their choice. This individual may be from inside or outside the Curry community. Parties may choose an attorney as an advisor. Except as may be provided in the Title IX Procedures, advisors may not speak on behalf of the party but may ask to suspend any meetings, interviews, or hearings briefly to provide consultation. Parties may seek assistance

from advisors in preparing written statements. Advisors should consult with the Title IX Coordinator on any questions that arise during the process.

The Title IX Coordinator maintains a list of staff and faculty advisors who have been specifically trained in this policy and process, including available support services related to sexual misconduct, relationship violence, and stalking. This list is available to any party who would prefer to use a trained advisor. Parties who wish to retain an attorney should be aware that Curry does not recommend particular attorneys.

XIV. ACCOMMODATIONS FOR INDIVIDUALS WITH DISABILITIES AND SPEAKERS OF LANGUAGE OTHER THAN ENGLISH

Any individual who, because of a disability, may require special arrangements in order to fully participate in the complaint process should inform the Title IX Coordinator. Upon receiving a request for and documentation of such disability, and in consultation with Curry's Director of Accessibility Services, the Title IX Coordinator will arrange appropriate accommodations for such individual.

Individuals for whom English is a second language may request the assistance of an interpreter and/or translator during the process.

XV. CURRY'S OBLIGATION TO ADDRESS ALLEGATIONS

There may be situations or circumstances when a student or employee is subjected to sexual misconduct but does not wish to come forward or pursue a complaint, or when a person observes such behavior directed at another member of the Curry community.

Curry College will do all it can to respect the reporting party's wishes, but may proceed to address allegations if and when college administrators become aware of such allegations, especially where the circumstances present a threat of harm or injury to the reporting party or other members of the community. This may include, but is not limited to, Curry bringing a complaint under the Title IX Procedures, or serving as Complainant under the Non-Title IX Procedures, and taking appropriate action based on an investigation of the complaint. Curry may also impose sanctions or take other remedial action when a person accepts responsibility for violating the policy. Any such action will be documented and such documentation will be maintained by the Title IX Coordinator.

There may be cases when a member of the community is subject to the policies of another entity with respect to conduct that may violate this policy. For example, a student participating in an internship program or a study abroad program may be adjudicated by the host institution for conduct that violates the sexual misconduct policy of that institution. This would not prevent Curry from also addressing the same conduct under this policy if it receives a report or complaint about such conduct.

There may also be cases in which an individual who is not a member of the Curry community (i.e., is not a student or employee) makes a report that a Curry community member has engaged in conduct that would violate this policy if directed toward a community member; e.g., an on campus vendor of Curry may report that a current student or employee has engaged in sexual harassment of the vendor's employee. In such cases, Curry may proceed to address allegations if and when college administrators become aware of such allegations, especially where the circumstances present a threat of harm or injury to the reporting party or members of the community.

This may include, but is not limited to, Curry taking appropriate action, including disciplinary action, based on a formal or informal investigation of the complaint. Any such action will be documented and such documentation will be maintained by the Title IX Coordinator.

Once informal or formal procedures are initiated, the persons charged with investigating or otherwise handling a complaint may consult with the Title IX Coordinator and/or the general counsel of Curry at any point during the process.

XVI. NON-INVESTIGATORY MEASURES AVAILABLE UNDER THE TITLE IX AND NON-TITLE IX PROCEDURES

A. Supportive Measures

Complainants (as defined above) who report allegations that could constitute covered sexual misconduct under this policy have the right to receive supportive measures from Curry regardless of whether they desire to file a complaint. Supportive measures are non-disciplinary and non-punitive and may not unreasonably burden the Respondent in the absence of a finding of responsibility for conduct prohibited by this policy. The Title IX Coordinator is responsible for the issuance of supportive measures. Any supportive measures put in place will be kept confidential, except to extent that doing so impairs ability of Curry to provide the supportive

measures. For example, in order to effectuate a housing change, Residence Life staff may be informed of the need to assist with a housing change as directed by the Title IX Coordinator, but will not be provided with any of the details of any complaint.

Supportive measures include, but are not limited to:

1. Counseling
2. Extensions of deadlines or other course-related adjustments
3. Modifications of work or class schedules
4. Campus escort services
5. Restrictions on contact between the parties (no contact orders)
6. Changes in work or housing locations
7. Leaves of absence
8. Increased security and monitoring of certain areas of the campus

Curry will document the supportive measures that are provided, as well as those that were requested but not provided, and must also document the reasons why the supportive measures were or were not provided. In the latter case, Curry will document the reasons why the denial of a requested supportive measure was not clearly unreasonable in light of known circumstances.

B. Emergency Removal Provisions

Curry reserves the right to issue an emergency removal of a student or employee (staff or faculty) prior to the commencement or conclusion of the Title IX or Non-Title Procedures. At all times, Curry reserves the right to determine which policies and procedures apply and which actions may be taken. Except as otherwise noted, proceedings under the Title IX or Non-Title IX Procedures do not preclude separate and additional proceedings under one or more other Curry policies or procedures.

- i) Upon receipt of Notice or knowledge of an allegation, or at any time during the resolution process, the Title IX Coordinating Committee may conduct an individualized risk assessment and may remove the Respondent from its education program or activities or employment, partially or entirely, on an emergency basis when the Title IX Coordinating Committee has determined that there exists an immediate threat to the physical health or safety of any student,

employee, or other Curry community member arising from the allegation in the report or complaint . If applicable, Respondent will not be subject to an emergency removal without full and appropriate consideration of applicable disability laws, including an individualized assessment of whether academic adjustments, auxiliary aids/service, reasonable accommodations, supportive measures, or other modifications are appropriate.

- ii) If an Emergency Removal is deemed necessary
 - (1) a student Respondent will receive communication of the Emergency Removal through the Office of Institutional Equity and Compliance which will be sent through the Maxient conduct database to the Respondent's Curry email address. A hold will be placed on the student's record.
 - (2) an employee Respondent will receive communication of the Emergency Removal through the Office of Institutional Equity and Compliance which will be sent through the Maxient conduct database to the Respondent's Curry email address. Human Resources and the Office of the Provost will be notified. The Office of the Provost will work with the Department Chair to ensure proper coverage.
 - (3) The communication to the Respondent will explain that
 - (a) The Respondent is not allowed on any College property, cannot attend classes, or any College sponsored activities both on and off campus
 - (b) The Respondent will need to make advance arrangements with the Office of Institutional Equity and Compliance for approval any time they may need to be on campus to take care of College-related business during the period of emergency removal;
 - (c) The Respondent has an opportunity to submit an online request to challenge the decision of the emergency removal.
- iii) If the Respondent wishes to challenge the emergency removal, they will submit an online appeal within five (5) business days explaining in detail the reasons for why they are challenging the Emergency Removal. Grounds to challenge the Emergency Removal are:
 - (1) The reliability of the information concerning the Respondent's alleged conduct, including the matter of their identity; or

- (2) Whether the alleged conduct and surrounding circumstances reasonably indicate that the continued presence of the Respondent on College property or within Curry programs poses an immediate threat to the physical health or safety of any student or other individual arising from the allegations of the allegations or complaint
- iv) The appeal for student Respondents will be reviewed by the Vice President of Student Affairs, or their designee, and the Emergency Removal will remain in effect during the appeal process. The appeal for employee Respondents will be heard by the Vice President for Human Resources, or their designee and the Emergency Removal will remain in effect during the appeal process. The appeal for faculty Respondents will be heard by the Provost and Executive Vice President for Academic Affairs, or their designee and the Emergency Removal will remain in effect during the appeal process.
- v) The Vice President for Student Affairs (for student Respondents), the Vice President for Human Resources (for staff Respondents), the Provost and Executive Vice President for Academic Affairs (for faculty Respondents) or their designees, will review the appeal, the incident report(s), and the original individualized safety and risk analysis.
 - (1) A Respondent can later request a meeting with the Title IX Coordinator to show why they no longer present an immediate threat to the physical health or safety because conditions related to imminence or seriousness have changed. A Complainant and their Advisor may be permitted to participate in this meeting if the Title IX Coordinator determines it is equitable to do so.
 - (2) The Vice President for Student Affairs, the Vice President for Human Resources, the Provost and Executive Vice President for Academic Affairs, or their designee, can request to meet with the Respondent in person or virtually, if deemed necessary to obtain any additional information or clarification.
 - (a) This meeting will not replace the Resolution process, which shall proceed in accordance with procedures identified in the Policy.
 - (b) This meeting is an administrative process intended to determine solely whether the Emergency Removal is appropriate, should be modified, or lifted based on the grounds of the appeal.

- (c) Respondent may provide information or other documentation for consideration prior to or during the meeting. When applicable, a Complainant may provide information to the Appeal Officer for review.
- vi) A final decision to either (1) uphold the Emergency Removal, (2) modify, or revoke it will be provided to the student within two (2) business days of receiving the student's appeal request or within two (2) business days of the date of the meeting between the Vice President for Student Affairs and the Student Respondent or the Vice President of Human Resources and the Employee Respondent.
 - (1) There will be no further appeals to the decision rendered upon review
 - (2) At any point in a Resolution Process of an allegation of a Prohibited Offense, Curry has the discretion to impose, lift, reassess, and modify an Emergency Removal as circumstances may warrant and as new information becomes available. If the Emergency Removal is modified or revoked, other supportive, remedial and protective measures may be assigned until the resolution of any related Resolution Option through the Office of Institutional Equity and Compliance is completed.
- vii) If the Emergency Removal is upheld, the Office of Institutional Equity and Compliance will send a memo to campus colleagues regarding the emergency removal.

C. Administrative Leave Provisions

Curry reserves the right to place an employee (staff or faculty) on administrative leave, with or without pay, during the pendency of a Title IX or Non-Title Procedures if it is determined that the employee poses an immediate threat to the physical health or safety of any individual arising from the allegations in the complaint. The Vice President of Human Resources, or the Provost (or designee), will consult with the Director of Public Safety, or designee, to determine whether such leave is advisable and the Vice President of Human Resources, or Provost, shall make the final decision. Appeals of these decisions shall be handled in the same manner as appeals of sanctions under the Title IX and non-Title IX Procedures. If applicable, Respondent will not be subject to an administrative leave without full and appropriate consideration of applicable disability laws, including an individualized assessment of whether reasonable accommodations or other modifications are appropriate.

XVII. COMPLAINTS AGAINST PERSONS OUTSIDE THE CURRY COMMUNITY

Faculty, staff, and students who have experienced policy violations committed by members outside of the Curry community may be entitled to supportive measures under Title IX, as determined by the Title IX Coordinator.

- A. Complaints against students from other institutions or other campus visitors should be reported to the Title IX Coordinator, or designee, who will take appropriate action. This may include forwarding the report, with the reporting party's permission, to the responding party's institution for adjudication.'
- B. Complaints against employees of entities that do business with Curry should be reported to the Title IX Coordinator, or designee, who, in coordination with the campus liaison for the vendor, will investigate the complaint and take appropriate action.
- C. Complaints against individuals at internship sites should be reported to the Title IX Coordinator, or designee, who will investigate the complaint and take appropriate action.
- D. Complaints against individuals at international study sites should be reported to the Title IX Coordinator, or designee, who will investigate the complaint and take appropriate action.
- E. Complaints by and against alumnae/i should be reported to the Title IX Coordinator, or designee, who will investigate the complaint and take appropriate action.

XVIII.COMPLAINTS AGAINST CERTAIN ADMINISTRATORS

If the President is the subject of a complaint under this policy, the Title IX Coordinator shall inform the Chair of the Board of Trustees, or designee, who will oversee the investigation process, which shall be carried out, to the extent practicable, in accordance with the procedures referenced in this policy. A confidential report will be made to the entire Board of Trustees at the conclusion of every investigation of the President. The Board will recommend appropriate corrective and/or disciplinary action.

If a member of the President's Executive Team is the subject of a complaint under this policy, the Title IX Coordinator, or designee, shall inform the President, or designee. A confidential report will be made to the President, or designee, at the conclusion of every investigation of a member of the Executive Team. The Title IX Coordinator, or designee, will recommend appropriate corrective

and/or disciplinary action.

XIX. MISUSE OF POLICY

The purpose of this policy is to promote and maintain an environment at Curry College that is free from sexual misconduct. Any member of the Curry community who believes that the member has been subjected to such behavior is encouraged to use the procedures provided in this policy, for the benefit and protection not only of that individual but ultimately of the entire Curry community. However, fabricated reports of charges of misconduct undermine the purpose and effectiveness of this policy.

Accordingly, as is the case with any Curry policy, persons who knowingly fabricate reports or complaints under this policy may be subject to disciplinary action. Allegations of fabricated complaints must be reported within 90 calendar days of the date of the final written decision. Such allegations may be reported to the Title IX Coordinator, who shall investigate the allegations and refer the individual to the appropriate administrator for disciplinary action, if warranted.

XX. INFORMATION CONCERNING REGISTERED SEX OFFENDERS

The Sex Offender Registry Board promotes public safety by educating and informing the public to prevent further victimization. They register and classify convicted sex offenders according to their risk of re-offense and the degree of danger they pose.

The Curry community is advised that law enforcement agency information provided by the state of Massachusetts concerning registered sex offenders may be obtained at the following web site:
https://sorb.chs.state.ma.us/sorbpublic/recaptcharEntry.action?_p=52NKe1fjeiDNxABtISO4J 0-Q9JhnnGCPtgS7bCH0l5DZIZj9TgcBm5UYKGfjjhBJ5EsW6UAYWZe2szxxWcnoZaRyVdBJnl392rW2o-Udzy

In addition, the Milton Police Department provides Curry's Office of Public Safety with notice of registered child sex offenders who reside in Milton. This information is available for review upon request by all members of the Curry community.

XXI. RESPONSIBLE OFFICE

For any questions regarding this policy, please contact the Office of Institutional Equity and Compliance.

XXII. HISTORY

The effective date of this policy is August 2026 and it supersedes any and all previous Title IX policies that may have been in effect previously in any written or electronic format.

APPENDIX A: RESOURCES AND REPORTING OPTIONS

A. What To Do After An Assault or Other Policy Offense

Victims of sexual assault or other policy offense are strongly encouraged to take the following steps soon after the assault:

1. Seek support. Call a friend, family member, or have someone else nearby contact a campus consultant or outside source of support, as described below
2. Report the assault to Public Safety, at 617-333-2222. Reporting the assault is important for your protection and to pursue any legal remedy related to the assault, such as prosecution, should you decide to do so. Reporting the assault can also help you regain a sense of personal power and control and can help promote the safety of other potential victims
3. If you feel unsafe, lock the door if possible and call Public Safety at 617-333-2222. Wait for your support person or a Public Safety officer to arrive
4. If the alleged perpetrator was unknown to you, try to remember any helpful details that may lead to their identification, such as scars or other marks, jewelry, dress, language, approximate height and weight in comparison to your own, vehicle description, tag number. Write these down as soon as you can and include the date and time of writing
5. At this moment, or later, you will need to decide whether to pursue legal remedy. To support legal remedies, do the following:
 - a) Do not disturb the area, room, or vehicle where the assault was committed
 - b) Do not bathe, shower, douche, brush your teeth, or eat or drink
 - c) Please see below about forensic examinations and preservation of physical evidence.

B. On Campus Sources of Support

If you have been sexually assaulted or experienced any other policy violation, you may choose to seek support from other members of the Curry community, such as fellow students, RAs, or faculty. Be aware that RAs and faculty members are required to disclose information concerning the incident.

Persons who by law can offer a greater level of confidentiality because of their special professional status, such as Curry's Chaplain, and staff from the Counseling Center and Health Services, may also be required to disclose personally identifiable information in cases that threaten imminent danger to a member of the Curry community. If you are concerned, please discuss confidentiality with the person to whom you wish to speak before disclosing the assault.

Counseling

If you are sexually assaulted or experience any other policy violation, it is important that you talk with a counselor who is trained to assist victims with the emotional and physical impacts of such conduct. This expertise is available in the Counseling Center, and at many off campus resources.

- (1) On-campus: Students may receive confidential counseling during work hours, free of charge, from Curry's counselors by contacting the Student Counseling Center: i. Appointments may be made by calling the office at 617-333-2182

C. Off Campus Sources of Support

If you have been sexually assaulted, or experienced any other policy violation, you may choose to receive assistance from a non-Curry source.

The following resources are available off campus:

- 1. Domestic Violence Ended (DOVE)
 - a. DOVE Hotline: 617-471-1234
- 2. A New Day
 - a. 24/7 Hotline. Trained staff are available to talk and provide resources.
 - b. 508-588-8255

3. Rape, Abuse, and Incest National Network includes a 24-hour online chat hotline and a 24-hour phone hotline to access comprehensive services and referrals to local agencies.
4. LoveisRespect.org includes a 24-hour online chat, text, or phone hotline to access comprehensive services for intimate partner violence and stalking and referrals to local agencies.
5. 1 in 6.org is an organization dedicated to the needs of male victim-survivors of sexual misconduct. Their services include an online chat hotline.

Contact information for off-campus resources may change, and other resources may become available over time. Curry College will periodically update this list as appropriate.

D. Medical Attention

Even if you think you do not have any physical injuries, you are strongly encouraged to have a medical examination and discuss with a health care provider the risk of exposure to sexually transmitted infection and the possibility of pregnancy resulting from the sexual assault. If you suspect that someone gave you a rape drug, such as Rohypnol (“roofies”), ask the hospital or clinic where you receive medical care to take a urine or blood sample.

You may choose to be seen at Health Center (617-333-2182) for injuries, testing for sexually transmitted infections, emergency contraception, and counseling. Please note that the Health Center does not collect evidence or perform forensic medical exams. The Health Center and the Counseling Center provide medical care and counseling, respectively, for all survivors of sexual assault, regardless of gender.

You may prefer to be taken to a local hospital for medical attention:

1. To be examined for injuries
2. To have evidence collected
3. To receive immediate counseling and referral service
4. To receive emergency contraception
5. To be tested and treated for STIs

If you desire transportation to the hospital, please contact Public Safety at 617-333-2222. If you are a student, please know that the on-call staff will accompany and assist you at the hospital. You will receive full and prompt cooperation from campus personnel in obtaining appropriate medical attention, including providing transportation to the nearest designated hospital.

E. Preservation of Evidence and Forensic Examinations

If you believe that you may choose to pursue a legal remedy related to a sexual assault at any time in the future, please request that the hospital perform a free Sexual Assault Forensic Examination (SAFE). Agencies vary as to the exact length of time, but physical evidence is most effectively obtained within 48 to 72 hours of a sexual assault, however it can be collected up to 120 hours post-assault.

If you are planning to have a SAFE examination, please preserve all physical evidence of the assault. Please do not bathe, shower, douche, brush your teeth, or eat or drink (this can be done after the examination). If you think you may want to pursue legal remedy related to the assault, it is important to preserve other evidence as well. Please do not wash or throw away any articles of clothing worn during the assault. Please place the items in a paper bag (plastic may break down the evidence), with each separate item in a separate bag if possible.

If you suspect that you have been the victim of a drug-facilitated sexual assault, please proceed immediately to Public Safety.

F. Obtaining Protective Orders

If you are the victim of relationship violence, you may be entitled to obtain a protective order against your abuser in the state of Massachusetts.

A protective order (also known as a “domestic violence protective order,” or “DVPO”) is available for incidents of domestic abuse, which occur when someone you have a specific relationship with (current/former spouse; cohabitant, which is someone with whom you have had a sexual relationship and lived with for at least 90 days in past year and includes same-sex partners; relative; someone you have a child in common with; or an individual with

whom you have had a consensual or nonconsensual sexual relationship within one year before the filing of the petition) commits one of the following offenses against you:

1. Assault
2. An act that places you in fear of immediate serious bodily harm or actually causes you serious bodily harm
3. Attempted or actual rape or sexual offense
4. Stalking
5. False imprisonment, such as holding you somewhere against your will

You may also be eligible for a protective order if you are a “vulnerable adult” (an adult who lacks the physical or mental capacity to provide for their daily needs).

Note: If you are NOT eligible for a protective order (because you do not have the specific relationship with the abuser described above), but you have been the victim of abuse and need protection, you may be eligible to file for a peace order.

Information about how to file for a protective order or a peace order can be found on the website of the Massachusetts Judiciary system. Protective orders can require the abuser to stay away from you, leave your home, provide emergency family maintenance to you, and attend counseling. They can be valid for up to one year and can be renewed. Peace orders can provide only a stay away order and require counseling and are effective for up to six months but can be renewed.

APPENDIX B: SANCTIONS FOR POLICY VIOLATIONS

A. Faculty

For faculty violations, sanctions may include a referral to the Provost for determination of employment status-related issues. This referral may result in imposition of a written warning, a letter of reprimand, mandatory attendance at an educational program on discrimination or harassment, mandatory referral for psychological assessment and compliance with any resulting treatment plan, restriction of responsibilities, restriction of activities and/or access to campus facilities, reassignment, denial of salary increase or salary decrease, suspension with or without pay, or dismissal.

B. Staff

For violations by employees other than faculty members, sanctions may include a referral to the Vice President for Human Resources, in consultation with a supervisor, for determination of employment status-related issues. This referral may result in imposition of a written warning, a letter of reprimand, mandatory attendance at an educational program on discrimination or harassment, mandatory referral for psychological assessment and compliance with any resulting treatment plan, restriction of responsibilities, restriction of activities and/or of access to campus facilities, reassignment or transfer to another department, denial of salary increase or a salary decrease, suspension with or without pay, final written warning, or termination.

C. Students

For student violations, sanctions may include a referral to the Assistant Vice President for the Student Experience & Dean of Students for determination of student status-related issues. This referral may result in the imposition of a written letter of warning, a letter of reprimand, mandatory attendance at an educational program on sexual harassment or sexual assault, mandatory referral for psychological assessment and compliance with any resulting treatment plan, change in room assignment, restriction of activities and/or on access of campus facilities, probation, expulsion from the residence halls and/or from nonacademic campus activities, suspension or expulsion from Curry and revocation of a degree. Students found responsible for sexual assault involving intercourse and/or penetration are likely to receive a sanction of suspension or expulsion upon referral for determination of student status related issues. In determining sanction, the sanctions panel or decisionmaker should consider:

1. the responding party's prior disciplinary history;
2. the nature and violence of the conduct at issue;
3. the impact of the conduct on the reporting party;
4. the impact of the conduct on the community, its members, or its property;
5. whether the responding party is likely to engage in the conduct in the future; and
6. any other mitigating or aggravating circumstances, including Curry's community principles. Alcohol and drug use are not considered mitigating circumstances.

The sanctions described in this policy are not exclusive of, and may be in addition to, other actions taken or sanctions imposed by outside authorities.

APPENDIX C: PROGRAMS TO PREVENT DATING VIOLENCE, DOMESTIC VIOLENCE, SEXUAL ASSAULT, AND STALKING

Education and training are a key component of maintaining an environment free from sexual misconduct, relationship violence, and stalking. Curry College is therefore committed to providing effective educational and training programs implementing its Sexual Misconduct Policy to all students, faculty, and staff. These are programs to prevent dating violence, domestic violence, sexual assault, and stalking. The programs are culturally relevant, inclusive of diverse communities and identities, sustainable, responsive to community needs, and informed by research or assessed for value, effectiveness, or outcome. They also consider environmental risk and protective factors as they occur on the individual, relationship, institutional, community, and societal levels. Curry programs are designed to provide the following information:

1. a statement that the institution prohibits the crimes of dating violence, domestic violence, sexual assault, and stalking;
2. the definition of “dating violence,” “domestic violence,” “sexual assault,” and “stalking” in the state of Massachusetts;
3. the definition of “consent,” in reference to sexual activity, in the state of Massachusetts;
4. a description of safe and positive options for bystander intervention;
5. information on risk reduction to recognize warning signs of abusive behavior and how to avoid potential attacks; and
6. information contained in Curry’s policy regarding disciplinary procedures and procedures to follow if individuals are the victim of a sexual offense, relationship violence, or stalking, and information about the rights of reporting parties and responding parties under the policy, including resources that are available to them.

A. Primary Prevention and Awareness Programs

1. Primary Prevention Programs: These include programming, initiatives, and strategies informed by research or assessed for value, effectiveness, or outcome that are intended to stop dating violence, domestic violence, sexual assault, and stalking before they occur through the promotion of positive and healthy behaviors that foster healthy, mutually respectful relationships and sexuality, encourage safe bystander intervention, and seek to change behavior and social norms in healthy and safe directions.

2. Awareness Programs: These are community-wide or audience-specific programming, initiatives, and strategies that increase audience knowledge and share information and resources to prevent violence, promote safety, and reduce perpetration.

3. At Curry, these programs include the following:

- a. Mandatory online training. Curry's primary prevention and awareness programs include a mandatory online educational program that all staff, faculty, and undergraduate students must take. Employees of Curry typically take the course within 30 days of employment, and thereafter as required by Curry. When initially implemented, all upper-class and transfer students were required to take the course in order to register for classes. Thereafter, the course is required of all incoming students. The online package also allows for the option of refresher courses that can be assigned to students and employees.
- b. Orientation program for first-year students. Curry's planned programming for first-year orientation includes comprehensive coverage of all information included in this policy, specifically emphasizing consent, bystander intervention, disciplinary policies and procedures, and available on- and off campus resources.
- c. Graduate student information program. Graduate students receive the information identified above through the distribution of written materials and through the Curry learning management system.

B. Primary Prevention and Awareness Programs

These programs and trainings offer safe and positive options that may be carried out by an individual or individuals to prevent harm or intervene when there is a risk of dating violence, domestic violence, sexual assault, or stalking. They include recognizing situations of potential harm, understanding institutional structures and cultural conditions that facilitate violence, overcoming barriers to intervening, identifying safe and effective intervention options, and taking action to intervene. Curry provides bystander intervention training through the programming described above and presents special programming on the topic.

C. Ongoing Prevention and Awareness Program

Ongoing prevention and awareness programs include programming, initiatives, and strategies that are sustained over time and focus on increasing understanding of topics relevant to and skills for addressing dating violence, domestic violence, sexual assault, and stalking, using a range of strategies with audiences throughout Curry and including information provided in

campus education programs, publications and Curry website. Throughout the academic year, Curry provides ongoing prevention and awareness programs that include the same information covered by Curry's primary prevention and awareness programs and is provided in the following formats:

1. Ongoing social media campaigns, including a Facebook page and Instagram account
2. Guest speakers for targeted audiences
3. Resource tables and bulletin boards
4. Panel discussions Updated August 2026 Sexual Misconduct Policy 34
5. Recognition of violence awareness months (i.e., Domestic Violence Awareness Month—October; Sexual Assault Awareness month—April).
6. Curry's website, which provides comprehensive information regarding all of the information listed above

D. Risk Reduction Programs

These programs present options designed to decrease perpetration and bystander inaction, and to increase empowerment for victims in order to promote safety and to help individuals and communities address conditions that facilitate violence. All of the training identified above promotes the reduction of risk on campus.

E. Training for Individuals with Specific Responsibilities

Individuals with specific responsibilities relating to Curry's Sexual Misconduct Policy will receive additional training as required to fulfill those responsibilities effectively. These individuals include the campus Title IX Coordinator, investigators, decision and appeals panel members, advisors, and campus safety officers. This training includes annual training on how to conduct an investigation and the dynamics of sexual misconduct, relationship violence, and stalking. This training is delivered through in-person sessions, attendance at conferences and presentations by experts, and online courses.

Training is also provided to all responsible employees regarding their reporting obligations under Title IX, including their obligation to report incidents of sexual misconduct, relationship violence, and stalking to the Title IX Coordinator and how to handle requests for

confidentiality. This training will be provided through in-person information sessions that will be made available to all employees.

APPENDIX D: RECORDKEEPING

Curry will retain records related to incidents processed under this policy in either secure data systems and/or in locked storage areas in the office(s) of the Title IX Coordinator. Curry will retain such records for a minimum period of seven (7) years, regardless of case outcome. Curry will destroy all case records after the applicable retention period.

Records to be retained include the investigators' report, the final decision, recordings of interviews and hearings, sanction decisions, the appeal decisions, and all supporting documentation, including investigation exhibits. Drafts of any formal documents shall not be retained.

The private notes of investigators, and of decision and appeals panel members, are considered by Curry to be sole possession records within the meaning of FERPA and are to be used by such individuals only as a personal memory aid in preparing the investigation report and decisions; are not to be made accessible or revealed to any other person; and shall be maintained by the investigator, hearing officer or panel member in a confidential file for a period of seven years.

In addition, the following record maintenance practices will be followed:

If the person is found responsible, the final decision will be maintained as described below for a period of seven years after the individual's employment has terminated at Curry, or the student has ceased attendance at Curry. All documentation related to these cases will be maintained by the Office of Institutional Equity and Compliance for at least 7 (seven) years. In addition:

- 1) Faculty: The final decision will be kept on file in the Office of the Provost in the faculty member's file.
- 2) Staff: The final decision will be kept on file in the Office of Human Resources with the personnel file of the employee.
- 3) Student: The final decision will be kept on file in the Office Community Standards and Accountability with the student's disciplinary file.

Non-Discrimination Policy

(Section Revised and Effective August 2026)

I. STATEMENT OF NONDISCRIMINATION

The College seeks to comply with all federal, state, and local laws, regulations, and ordinances prohibiting discrimination in post-secondary education institutions. The College does not discriminate against any employee, applicant for employment, student, or applicant for admission on the basis of actual or perceived

- Age (40 years and over in the employment context)
- Citizenship status
- Color
- Creed
- Disability (physical or mental)
- Domestic violence victim status
- Ethnicity
- Family responsibilities
- Gender expression
- Gender identity
- Genetic information (including family medical history)
- Marital status
- National origin (including shared ancestry)
- Political belief or affiliation
- Pregnancy or related conditions
- Race, (including traits associated with race such as hair texture, afro hairstyles, and protective hairstyles)
- Religion
- Sex
- Sexual orientation
- Veteran or military status

This Policy covers nondiscrimination in both employment and access to educational opportunities. Therefore, any member of the College community whose acts deny, deprive, unreasonably interfere with or limit the education or employment, residential, and/or social access, benefits, and/or opportunities of any member of the College community, guest, or visitor on the basis of that person's actual or perceived protected characteristic(s), is in violation of this Policy.

II. DEFINITIONS

Complainant means an individual who has been subjected to conduct that could constitute a violation of this policy

Employee means any person, whether or not also incidentally a student, who is currently employed by the college, and does not include independent contractors. The term employee will also include:

- Applicants for employment
- Employees currently on paid or unpaid leave, whether administrative leave, sabbatical, or other type of approved leave

Reporter means a person who reports a potential policy violation to the Title IX Coordinator and can be a person other than the Complainant.

Respondent means an individual who has been reported to be the perpetrator of conduct that could constitute a violation of this policy.

Student means any individual who has applied for admission, paid a deposit, registered, or entered any other contractual relationship with Curry College for any form of instruction, whether for credit, including those in the undergraduate, graduate, and certificate programs. For purposes of this policy, “student” status begins at the time of such application, payment, registration, or contractual undertaking, even if the student has not yet arrived on campus or commenced instruction and continues until such time as the student graduates or otherwise completes the relevant program, formally and permanently withdraws, or is expelled. A student who has taken a leave of absence, is on a medical leave, or has been suspended continues to be considered a “student” for purposes of this policy

III. SCOPE OF POLICY

This policy prohibits discrimination committed by a member of the college community. College community members include students, trustees, alumni, faculty, administration, staff, visitors, volunteers, independent contractors, and any individuals regularly or temporarily employed, studying, living, visiting, conducting business, or having any official capacity at the college.

This policy applies to conduct occurring on Curry College property, or at or within college sanctioned events or programs that take place off-campus, including study away, community-based learning, and internship programs. This policy also applies to off-campus conduct, including the use of technology off-campus, that violates this policy if such conduct may have substantial adverse effect on any member of the Curry College community.

This policy applies to conduct by a student, even if it occurs outside of an academic term or when the student is not otherwise enrolled in a course at Curry College (e.g., during summer or holiday break, or participating in a non-Curry study abroad program). Moreover, Curry College continues to administer the policy with respect to any conduct engaged in by the student while a “student” as defined by this policy, even if the student subsequently graduates, withdraws, takes leave, or is otherwise absent from Curry College, and even if Curry College does not learn of such conduct until after the student graduates, withdraws, takes leave, or is otherwise absent from the college.

Curry College also continues to administer the policy with respect to any conduct by an employee with respect to any conduct engaged in by the employee while an “employee”

as defined in this policy if the employee subsequently leaves the college, even if Curry College does not learn of such conduct until after the employee leaves the college.

Any Curry employee who is also taking a class or classes at the college will be considered an employee for the purposes of this policy.

Complaints of sexual misconduct, relationship violence, or stalking shall be addressed under the Sexual Misconduct Policy and may not be brought under this policy. Such complaints should be reported to the Title IX Coordinator. The College recognizes, however, that sexual misconduct can occur in conjunction with conduct related to an individual's race, color, ethnicity, national origin, religion, age, or disability. Under these circumstances, the College reserves the right, in the sole discretion of the Title IX Coordinator, to coordinate the investigation and resolution efforts of such cases under the Sexual Misconduct Policy.

Complaints concerning denials of student requests for accommodation are heard pursuant to the college's Student Disability Grievance Policy and Procedure.

Questions about this policy should be directed to Curry's Director of Title IX and Institutional Equity: TitleIX@curry.edu.

IV. PROHIBITED CONDUCT

Discrimination

Discrimination under this policy is defined as conduct directed at individuals because of their race (including traits associated with race such as hair texture, afro hairstyles, and protective hairstyles), color, national origin (including shared ancestry), citizenship status, ethnicity, sexual orientation, gender identity, gender expression, religion, creed, sex, marital status, pregnancy or related conditions, family responsibilities, status as a domestic violence survivor, age (except when sex or age is a bona fide qualification), veteran or military status, disability (when the person is otherwise qualified), political belief or affiliation, or genetic information that subjects the individual to different treatment so as to adversely affect the individual's employment or educational experience at the college. Discrimination includes retaliation against an individual for reporting instances of discrimination or harassment under this policy.

Harassment

Harassment is: (1) unwelcome conduct (2) directed at an individual (3) because of their race, color, national origin, ethnicity, sexual orientation, gender identity, religion, sex, marital status, age (except when sex or age is a bona fide qualification), disability (when the person is otherwise qualified), veteran status, genetic information or other protected status (4) that has the effect of unreasonably interfering with an individual's work or academic performance. Harassment may include, but is not limited to, use of racial, ethnic, or religious, slurs or epithets, or other threatening, intimidating, hostile or abusive conduct directed at a person because of characteristics protected by this policy.

Harassment, however, must include something beyond the mere expression of views, words, symbols or thoughts that some person finds offensive. Harassment creates a

hostile environment when unwelcome conduct based on the totality of circumstances, is subjectively and objectively offensive and is so severe or pervasive that it limits or denies a person's ability to participate in or benefit from a school's education program or activity. Harassment creates a hostile work environment when the conduct is severe or pervasive enough to create a work environment that a reasonable person would consider intimidating, hostile, or abusive.

V. EDUCATION

Education and training are a key component of maintaining an environment free from discrimination and harassment. Curry College is committed to providing effective educational and training programs for students, faculty, and staff about this policy and the issues it addresses.

The College also maintains a Bias Incident Response Team that has within its mandate the provision of educational, as well as the development of programming that fosters a climate of inclusion, equity and respectful discourse.

This policy is included in the Employee Handbook and is also available online.

VI. CONFIDENTIALITY AND PRIVACY OF PROCEEDINGS

Curry College recognizes that confidentiality is important in matters involving complaints of discrimination or harassment. All persons responsible for implementing this policy will respect the confidentiality and privacy of the individuals involved, to the extent reasonably possible. Those individuals reporting, accused of, or otherwise involved in a discrimination or harassment complaint are also required to keep the matter as confidential as is reasonably possible. Absolute confidentiality may not be maintained in all circumstances, including when the college is required to disclose information in response to legal process or when the college's need to protect the rights of others must outweigh confidentiality concerns.

Often a person reporting or otherwise concerned about discrimination or harassment wants a discussion to be confidential or "off the record." The level of confidentiality depends on what legal protections are held by the specific persons receiving the information, and should be addressed with them before specific facts are disclosed. Confidential discussions about discrimination or harassment may be available from persons who, by law, have special professional status. At Curry those individuals are the college chaplain, the counselors at the Student Counseling Center and staff in the Student Health Center. All other Curry employees, including faculty, staff, and resident assistants (RAs), are required to report to the college's Title IX Coordinator incidents of discrimination and harassment of which they become aware.

College employees who wish to engage in confidential discussions about discrimination or harassment may also choose to use Curry's Employee Assistance Program (EAP), if eligible for that program. Discussions are confidential and are not reported to the college.

Individuals who participate in a proceeding under this policy may share information that they provide or learn during the process with advisors and family members. The sharing of information beyond these parameters may constitute retaliation, which may result in separate charges under this policy or the Student Code of Conduct or employee disciplinary proceedings.

VII. COURSE MATERIALS AND CONTENT

Complaints under this policy that course materials, projects, or classroom discussions are offensive because they discriminate against individuals on an impermissible basis and/or create a hostile environment in the classroom are to be evaluated with due regard to principles of academic freedom. Consistent with those principles, course content and teaching methods remain the province of individual faculty members. However, course content or teaching methods that focus attention on characteristics protected by this policy, or on such characteristics of individual students, faculty, or staff, are inappropriate and may constitute a violation of this policy.

VIII. ADVISORS

Both parties in the informal resolution process or the formal complaint process of this policy may have an advisor of their choice present throughout those processes. The advisor shall not be a practicing attorney and must be a member of the college community (employee or student). The college places restrictions on advisors of both parties regarding the extent of their participation in the investigation process. Advisors may assist a party with understanding the investigation process and preparing for interviews and meetings; attend interviews and meetings with the party; provide emotional support; and otherwise assist, support and provide guidance and advice as the party moves through the process. Advisors may not speak on behalf of the party at any interviews or meetings or through any written documents. Advisors should consult with the Title IX Coordinator about any questions that arise during the process. Since an Advisor is not required in matters being adjudicated by the College's Non-TIX Procedures, the College is not required to provide an Advisor for matters related to the College's Nondiscrimination Policy.

IX. PROCEDURES: GENERAL

Curry College wishes to protect the rights and the integrity of all members of its community. This includes the right of individuals to be free from discrimination and harassment. Any person who feels they have been subjected to discrimination or harassment, as defined in this policy, may choose to initiate either the informal or formal procedures described below. These procedures should be followed in as confidential and sensitive a manner as possible to protect all of the individuals involved.

A. Reporting Deadline

Prompt reporting of a complaint of discrimination or harassment as defined in this policy is strongly encouraged because it facilitates a timely resolution of the matter. However, there may be instances when the person making a complaint is reluctant or unable to report the alleged discrimination or harassment and delayed reporting may

result. The Title IX Coordinator is authorized to process a complaint of discrimination or harassment at any time, but delayed reporting may negatively impact the ability of the Title IX Coordinator to conduct a thorough investigation.

B. Accommodations

For individuals with disabilities and speakers of languages other than English. Any individual who, because of a disability, may require special arrangements to fully participate in the complaint process should inform the Title IX Coordinator. Upon receiving a request for and documentation of such disability, and in consultation with the college's Office of Accessibility Services, the Title IX Coordinator will arrange appropriate accommodations for such individual. Individuals for whom English is a second language may request the assistance of an interpreter and/or translator during the process.

C. Curry's Obligation to Address Allegations

There may be situations or circumstances when a member of the college community is subjected to discrimination or harassment but does not wish to come forward, pursue a complaint under this policy, or when a person observes discrimination or harassment directed at another member of the college community. Curry College will do all it can to respect the Complainant's wishes, but it may proceed to address allegations of discrimination or harassment if and when the college becomes aware of such allegation, especially where the circumstances present a threat of harm or injury to the Complainant or other members of the community. In circumstances where the college is on notice of a hostile environment, the college will also take prompt and effective steps reasonably calculated to end the harassment, eliminate any hostile environment and its effect, and prevent the harassment from recurring. This may include the college initiating an investigation and taking appropriate action based on an investigation of the complaint. The college may also impose sanctions or take other remedial action when a person self-reports and/or accepts responsibility for violating the policy. Any such action will be documented, and such documentation will be maintained by the Title IX Coordinator.

D. Supportive Measures

Complainants (as defined above) who report allegations that could constitute covered violations of this policy have the right to receive supportive measures from the college regardless of whether they desire to file a complaint. Supportive measures are non-disciplinary and non-punitive and may not unreasonably burden the Respondent in the absence of a finding of responsibility for conduct prohibited by this policy. The Title IX Coordinator is responsible for the issuance of supportive measures. Any supportive measures put in place will be kept confidential, except to extent that doing so impairs ability of the college to provide the supportive measures. For example, in order to effectuate a housing change, Residence Life staff may be informed of the need to assist with a housing change as directed by the Title IX Coordinator, but will not be provided with any of the details of any complaint.

Supportive Measures include, but are not limited to:

- 1) Counseling
- 2) Extensions of deadlines or other course-related adjustments
- 3) Modifications of work or class schedules

- 4) Campus escort services
- 5) Restrictions on contact between the parties (no contact orders)
- 6) Changes in work or housing locations
- 7) Leaves of absence

The college will document the supportive measures that are provided, as well as those that were requested but not provided, and must also document the reasons why the supportive measures were or were not provided. In the latter case, the college will document the reasons why the denial of a requested supportive measure was not clearly unreasonable in light of known circumstances.

Every effort will be made to grant requests for supportive measures if they are reasonably available, and both parties will be notified in writing of any supportive measures that are implemented. Supportive measures may become permanent sanctions as an outcome of the informal or formal process.

E. Emergency Removal Provisions

Curry reserves the right to issue an emergency removal of a student or employee (staff or faculty) prior to the commencement or conclusion of the Non-Title Procedures.

Except as otherwise noted, proceedings under the Non-Title IX Procedures do not preclude separate and additional proceedings under one or more other Curry policies or procedures.

1. Upon receipt of Notice or knowledge of an allegation, or at any time during the resolution process, the Non-Title IX Coordinating Committee may conduct an individualized risk assessment and may remove the Respondent from its education program or activities or employment, partially or entirely, on an emergency basis when the Non-Title IX Coordinating Committee has determined that there exists an immediate threat to the physical health or safety of any student, employee, or other Curry community member arising from the allegation in the report or complaint. If applicable, Respondent will not be subject to an emergency removal without full and appropriate consideration of applicable disability laws, including an individualized assessment of whether academic adjustments, auxiliary aids/service, reasonable accommodations, supportive measures, or other modifications are appropriate.
2. If an Emergency Removal is deemed necessary
 - a. A student Respondent will receive communication of the Emergency Removal through the Office of Institutional Equity and Compliance which will be sent through the Maxient conduct database to the Respondent's Curry email address. A hold will be placed on the student's record.
 - b. An employee Respondent will receive communication of the Emergency Removal through the Office of Institutional Equity and Compliance which will be sent through the Maxient conduct database to the Respondent's Curry email address. Human

Resources and the Office of the Provost will be notified. The Office of the Provost will work with the Department Chair to ensure proper coverage.

- c. The communication to the Respondent will explain that
 - i. The Respondent is not allowed on any College property, cannot attend classes, or any College sponsored activities both on and off campus;
 - ii. The Respondent will need to make advance arrangements with the Office of Institutional Equity and Compliance for approval any time they may need to be on campus to take care of College-related business during the period of emergency removal; and
 - iii. The Respondent has an opportunity to submit an online request to challenge the decision of the emergency removal.
3. If the Respondent wishes to challenge the emergency removal, they will submit an online appeal within five (5) business days explaining in detail the reasons for why they are challenging the Emergency Removal.

Grounds to challenge the Emergency Removal are

- a. The reliability of the information concerning the Respondent's alleged conduct, including the matter of their identity; or
 - b. Whether the alleged conduct and surrounding circumstances reasonably indicate that the continued presence of the Respondent on College property or within Curry programs poses an immediate threat to the physical health or safety of any student or other individual arising from the allegations of the allegations or complaint.
4. The appeal for student Respondents will be reviewed by the Vice President of Student Affairs, or their designee, and the Emergency Removal will remain in effect during the appeal process. The appeal for employee Respondents will be heard by the Vice President for Human Resources, or their designee and the Emergency Removal will remain in effect during the appeal process. The appeal for faculty Respondents will be heard by the Provost and Executive Vice President for Academic Affairs, or their designee and the Emergency Removal will remain in effect during the appeal process.
 5. The Vice President for Student Affairs (for student Respondents), the Vice President for Human Resources (for staff Respondents), the Provost and Executive Vice President for Academic Affairs (for faculty Respondents) or their designees, will review the appeal, the incident report(s), and the original individualized safety and risk analysis.

The Vice President for Student Affairs, the Vice President for Human Resources, the Provost and Executive Vice President for Academic Affairs, or their designee, can request to meet with the Respondent in person or virtually, if deemed necessary to obtain any additional information or clarification.

- a. This meeting will not replace the Resolution process, which shall proceed in accordance with procedures identified in the Policy.
 - b. This meeting is an administrative process intended to determine solely whether the Emergency Removal is appropriate, should be modified, or lifted based on the grounds of the appeal.
 - c. Respondent may provide information or other documentation for consideration prior to or during the meeting. When applicable, a Complainant may provide information to the Appeal Officer for review.
6. A final decision to either (1) uphold the Emergency Removal, (2) modify, or revoke it will be provided to the student within two (2) business days of receiving the student's appeal request or within two (2) business days of the date of the meeting between the Vice President for Student Affairs and the Student Respondent or the Vice President of Human Resources and the Employee Respondent.
 - a. There will be no further appeals to the decision rendered upon review.
 - b. At any point in a Non-Title IX process of an allegation in the report or complaint, Curry has the discretion to impose, lift, reassess, and modify an Emergency Removal as circumstances may warrant and as new information becomes available. If the Emergency Removal is modified or revoked, other supportive, remedial and protective measures may be assigned until the resolution of any related Resolution Option through the Office of Institutional Equity and Compliance is completed.
7. If the Emergency Removal is upheld, the Office of Institutional Equity and Compliance will send a memo to campus colleagues regarding the emergency removal.
8. A Respondent can later request a meeting with the Title IX Coordinator to show why they no longer present an immediate threat to the physical health or safety because conditions related to imminence or seriousness have changed. A Complainant and their Advisor may be permitted to participate in this meeting if the Title IX Coordinator determines it is equitable to do so.

F. Administrative Leave Provisions

Curry reserves the right to place an employee (staff or faculty) on administrative leave, with or without pay, during the pendency of Non-Title Procedures if it is determined that the employee poses an immediate threat to the physical health or safety of any individual arising from the allegations of the complaint. The Vice President of Human Resources, or the Provost (or designee), will consult with the Director of Public Safety, or designee, to determine whether such leave is advisable and the Vice President of Human Resources, or Provost, shall make the final decision. Appeals of these decisions shall be handled in the same manner as appeals of sanctions under the Title IX and non-Title IX Procedures. If applicable, Respondent will not be subject to an administrative leave without full and appropriate consideration of applicable disability laws, including an individualized assessment of whether reasonable accommodations or other modifications are appropriate.

X. MAKING A REPORT VS. FILING A COMPLAINT

A report is defined as a notification of an incident of a policy violation to the Title IX Coordinator by any reporting person. A report may be accompanied by a request for supportive measures, no further action, and/or to initiate a formal complaint process by filing a complaint. By contrast, the filing of a complaint initiates the college's formal investigation process.

At the time a report is made, a reporting party does not have to decide whether to file a complaint. The college recognizes that not every individual will be prepared to file a complaint with the college and individuals are not expected or required to pursue a specific course of action. Choosing to make a report and deciding how to proceed after making the report can be a process that unfolds over time. To the extent possible, the college will respect an individual's autonomy in making these important decisions and provide support that will assist each individual in making that determination. A report may become a formal complaint, initiated by either the reporting party or the college, as more fully described in this policy.

To file a complaint, please contact the Title IX Coordinator. Note: Prompt filing of a complaint facilitates a timely resolution of the matter. An individual, such as a former student or former employee who has since left the Curry community, may bring a complaint at any time for alleged behavior that occurred while the individual was a member of the Curry community, although a significant delay in filing a complaint may limit the college's ability to conduct a thorough investigation. Similarly, students and employees may also be found responsible under this policy for conduct that is not discovered until after a degree is awarded or employment has terminated.

XI. COMPLAINTS AGAINST PERSONS OUTSIDE THE CURRY COLLEGE COMMUNITY

Faculty, staff, and students who have experienced policy violations committed by members outside of the Curry College community may be entitled to supportive measures under Title IX, as determined by the Title IX Coordinator.

1. Complaints against students from other institutions or other campus visitors should be reported to the Title IX Coordinator who will take appropriate action. This may include forwarding the report, with the reporting party's permission, to the responding party's institution for adjudication.
2. Complaints against employees of entities that do business with Curry should be reported to the Title IX Coordinator, who, in coordination with the campus liaison for the vendor, will investigate the complaint and take appropriate action.
3. Complaints against individuals at internship sites should be reported to the Title IX Coordinator, who in consultation with the Executive Director of Career & Experiential Learning will investigate the complaint and take appropriate action.

4. Complaints against individuals at international study sites should be reported to the Title IX Coordinator, who in consultation with the Executive Director of Career & Experiential Learning, will investigate the complaint and take appropriate action.
6. Complaints by and against alumnae/i should be reported to the Title IX Coordinator will investigate the complaint and take appropriate action.

XII. COMPLAINTS AGAINST CERTAIN ADMINISTRATORS

If the president is the subject of a complaint under this policy, the Title IX Coordinator shall inform the Chair of the Board of Trustees, who will oversee the investigation process, which shall be carried out, to the extent practicable, in accordance with the procedures referenced in this policy. A confidential report will be made to the entire Board of Trustees at the conclusion of every investigation of the President. The Board will recommend appropriate corrective and/or disciplinary action.

If a member of the President's Executive Team is the subject of a complaint under this policy, the Title IX Coordinator shall inform the President. A confidential report will be made to the President at the conclusion of every investigation of a member of the Executive Team. The Title IX Coordinator will recommend appropriate corrective and/or disciplinary action.

XIII. PROTECTION FOR COMPLAINANTS AGAINST RETALIATION

Threats, intimidation, and retaliation against a complainant for bringing a complaint under this policy, or against any person for participating in the informal or formal process, serving as a witness, or reporting violations of this policy are violations of this policy and thus may be grounds for disciplinary action. Complaints of retaliation may be addressed within an ongoing formal complaint process, or within a separate complaint proceeding, at the discretion of the Title IX Coordinator.

The college will take steps to protect students and employees from reprisal by the Respondent. Such protection will need to be appropriate to the individual's circumstances. For students, this may include the opportunity to change a residence hall assignment, drop a course, transfer to another section of a course, complete a course independently, have a pass/fail option, have a third party grade the student's work, have another person assigned to write recommendations or references on behalf of the student, have another person assigned as an advisor to the student, or change a work assignment. For employees, such protection may include having a third party conduct the annual evaluation, changing a work assignment of the Complainant or Respondent, or transferring the Complainant or Respondent to another department, if feasible.

XIV. MISUSE OF POLICY

The purpose of this policy is to promote and maintain an environment at Curry College that is free from discrimination and harassment. Members of the college community who believe that they have been subjected to discrimination or harassment are encouraged to use the procedures provided in this policy, for the benefit and protection not only of those

individuals but ultimately of the entire college community. However, fabricated charges of discrimination and harassment undermine the purpose and effectiveness of this policy. Accordingly, as is the case with any Curry policy, persons who knowingly fabricate complaints under this policy may be subject to disciplinary action. Allegations of fabricated charges must be reported within ninety days of the date of the final determination. Such allegations may be reported to the Title IX Coordinator, who shall investigate the allegations and take any appropriate action. The failure of a complaint to result in a finding of discrimination or harassment is not alone evidence that the charges were knowingly false.

APPENDIX A: RECORD KEEPING

The college will retain records related to incidents processed under this policy in either secure data systems and/or in locked storage areas in the office(s) of the Title IX Coordinator. The college will retain such records for a minimum period of seven (7) years, regardless of case outcome. The college will destroy all case records after the applicable retention period.

Records to be retained include the investigators' report, the final decision, recordings of interviews and hearings, sanction decisions, the appeal decisions, and all supporting documentation, including investigation exhibits. Drafts of any formal documents shall not be retained.

The private notes of investigators, and of decision and appeals panel members, are considered by the college to be sole possession records within the meaning of FERPA and are to be used by such individuals only as a personal memory aid in preparing the investigation report and decisions; are not to be made accessible or revealed to any other person; and shall be maintained by the investigator, hearing officer or panel member in a confidential file for a period of seven years.

In addition, the following record maintenance practices will be followed:

If the person is found responsible, the final decision will be maintained as described below for a period of seven years after the individual's employment has terminated at the college, or the student has ceased attendance at the college. All documentation related to these cases will be maintained by the Office of Institutional Equity and Compliance for at least 7 (seven) years. In addition:

- 1) Faculty: The final decision will be kept on file in the Office of the Provost in the faculty member's file.
- 2) Staff: The final decision will be kept on file in the Office of Human Resources with the personnel file of the employee.
- 3) Student: The final decision will be kept on file in the Office Community Standards and Accountability with the student's disciplinary file.

Procedures for the Resolution of Reports Alleging Sexual Misconduct Falling Within the Scope of Title IX (“Title IX Procedures”)

(Section Revised and Effective August 2026)

Curry College (“Curry”) adopts these procedures establish a resolution process for certain complaints defined in the Sexual Misconduct Policy (SMP). Definitions in the SMP apply to terms used in these procedures.

I. JURISDICTION AND SCOPE¹

Under the United States Department of Education’s Title IX Regulations, published May 19, 2020 (The Title IX Final Rule), the following procedures will apply only to a narrow category of complaints. Reports of Prohibited Conduct (as defined in the SMP) meeting the definitions and jurisdictional elements below will follow these Title IX Procedures. Those reports of sexual misconduct that do not meet the jurisdictional requirements of the new regulations will be handled through The Procedures for the Resolution of Reports Alleging Sexual Misconduct Outside the Scope of Title IX (Non-Title IX Procedures); this is not to suggest that any case is more or less important, but instead a reflection of federal regulations that apply only to a specifically identified set of cases.

This procedure applies to reports of Prohibited Conduct that meet the following criteria:

A. Nature of Complaint

A complaint of conduct on the basis of sex that falls into one of the following categories

- (1) a complaint of Dating Violence, Domestic Violence, Stalking, or Sexual Assault (as defined in the SMP);
- (2) unwelcome conduct determined by a reasonable person to be so severe, pervasive, and objectively offensive that it effectively denies the Complainant equal access² to an education program or activity, including employment³; or

¹ Should any portion of the Title IX Final Rule, 85 Fed. Reg. 30026 (May 19, 2020), be stayed or held invalid by a court of law, or should the Title IX Final Rule be withdrawn or modified to not require the elements of this policy, this policy or the invalidated elements of this policy will be deemed revoked as of the publication date of the opinion or order and for all reports after that date, as well as any elements of the process that occur after that date if a case is not complete by that date of opinion or order publication. Should the Title IX Procedures be revoked in this manner, any conduct covered under the Title IX Procedures shall be investigated and adjudicated under the Non-Title IX Procedures

² Whether the Complainant has been deprived of “equal access” shall be measured by the Title IX Coordinator (TIXC) against the access of a person who has not been subject to the sexual harassment. Signs of enduring unequal access may include skipping class or work to avoid a harasser, having difficulty concentrating in class or on the job, or a decline in grades or performance. However, no concrete injury is required to show unequal access.

³ The determination whether the alleged conduct meets this standard will be made by the TIXC, who will determine whether the alleged conduct was “unwelcome” based on whether the Complainant viewed the conduct as unwelcome, and whether the conduct, as alleged, is “severe, pervasive, and objectively offensive,” based on an objective reasonable person standard. The latter evaluation shall be made on a case-by-case basis, and will require

- (3) conduct by an employee conditioning the provision of an aid, benefit, or service of Curry on the Complainant's participation in unwelcome sexual conduct.

B. Location of Complaint

1. The incident(s) occurred on Curry's campus, within the United States;
2. the incident(s) occurred in a building under Curry's control, such as a classroom outside of Curry's main campus, and within the United States;
3. the incident(s) were part of one of Curry's education programs or activities within the United States, including locations, events, or circumstances over which Curry exercised substantial control over both the Respondent and the context in which the conduct occurred; or
4. the incident occurred through the use by an individual located in the United States of computer and internet networks, digital platforms, and computer hardware or software owned or operated by, or used in the operations of, Curry's programs and activities over which Curry has substantial control.

C. Identity of the Complainant

This procedure will apply to Complainants, who at the time of filing a Formal Complaint are participating in or attempting to participate in the education program or activity of Curry, regardless when the incident occurred. This includes, but is not limited to, current students, (whether applicant, admitted, currently enrolled, or on leave of absence; includes alumni or former students attempting to participate in a college activity) and current employees (applicant, hired but not yet working, or employed).

D. Identity of the Respondent

This procedure will apply to Respondents, who at the time of filing a Formal Complaint are participating in or attempting to participate in the education program or activity of Curry, regardless when the incident occurred. This includes but is not limited to current students, (whether applicant, admitted, currently enrolled, or on leave of absence; includes alumni or former students attempting to participate in a college activity) and current employees (applicant, hired but not yet working, or employed).

II. FORMAL COMPLAINTS

Formal Complaints: For the purposes of these Title IX Procedures, "Formal Complaint" means a document—including an electronic submission—filed by a Complainant with a signature or other indication that the Complainant is the person filing the Formal Complaint, or signed by the Title IX Coordinator, alleging Prohibited Conduct against a Respondent about conduct within Curry's education program or activity and requesting initiation of the procedures to investigate the allegations.

Complainants are only able to file a Formal Complaint under this policy if they meet the conditions of Section I.C above. For Complainants who do not meet these criteria, Curry

the TIXC to evaluate the facts of each case, including the Complainant's age, disability status, sex, and other characteristics.

will utilize different processes, including the Student Code of Conduct or the Non-Title IX Procedures.

Similarly, Curry will consider complaints under these procedures only if the Respondent meets the conditions of Section I.D above. Complaints against Respondents who do not meet these criteria will be processed under the Non-Title IX Procedures.

To promote timely and effective review, Curry strongly encourages Complainants and other persons with knowledge of possible violations of this policy to make reports as soon as possible. A delay in reporting may affect Curry's ability to gather relevant and reliable information, contact witnesses, investigate thoroughly, and respond meaningfully. It may also affect Curry's ability to take disciplinary action against a student or employee who has engaged in Prohibited Conduct.

If the Complainant and/or Respondent is no longer a student or employee at the time of the Formal Complaint and Curry is, thus, unable to pursue resolution under these procedures, Curry will process the complaint under the Non-Title IX Procedures, provide supportive measures for the parties and, as feasible, taking appropriate steps to end any Prohibited Conduct, prevent its recurrence, and address its effects.

If the report falls within the jurisdiction of these procedures the Investigator will take the following actions:

A. Response Where the Complainant and/or Respondent's Identity is Known

Where the identity of the Complainant and/or Respondent is known, the Title IX Coordinator will promptly contact the Complainant and/or Respondent to discuss the availability of supportive measures, inform the Complainant and/or Respondent of the availability of supportive measures with or without the filing of a Formal Complaint, and explain to the Complainant the process for filing a Formal Complaint. (See, SMP, Supportive Measures, Section XVI.A.)

Supportive measures are designed to restore or preserve the Complainant's and/or Respondent's equal access to Curry's education programs or activities without unreasonably burdening the other party, and will consider the Complainant and/or Respondent's wishes with respect to these measures.

B. Response Where the Complainant's Identity is Unknown

Where a report is filed but the identity of the Complainant is unknown, the Title IX Coordinator will assess the nature and circumstances of the report, including whether it provides information that identifies the potential Complainant, the potential Respondent, any witnesses, and/or any other third party with knowledge of the reported incident, and take reasonable and appropriate steps to respond to the report of Prohibited Conduct consistent with applicable federal and state laws and these procedures.

C. Response Where the Respondent's Identity is Unknown

Where a report is filed but the identity of the Respondent is unknown, the Title IX Coordinator will assess the nature and circumstances of the report, including whether it provides information that identifies the potential Respondent, any witnesses, and/or

any other third party with knowledge of the reported incident, and take reasonable and appropriate steps to respond to the report of Prohibited Conduct consistent with applicable federal and state laws and these procedures.

D. Curry's Actions Following an Initial Assessment With Known Complainant

- a. Where the Complainant seeks resolution under these procedures
 - i. In any case where the Complainant reports Prohibited Conduct and requests resolution under these procedures, the Title IX Coordinator will promptly initiate an investigation. This process begins with the Complainant, making a signed, written Formal Complaint. A Formal Complaint must be filed with the Title IX Coordinator, and may be filed in person, by mail, or by electronic mail, addressed to the Title IX Coordinator.
- b. Where the Complainant does not seek resolution under these procedures
 - i. Curry supports any complainant's decision not to pursue a Formal Complaint under these procedures.

Where the Complainant does not wish to pursue a Formal Complaint under these procedures, Curry will honor the Complainant's wishes unless doing so would not adequately mitigate the risk of harm to the Complainant or other members of the Curry community or when doing so materially impacts Curry's ability to provide a safe and non-discriminatory environment for all members of the Curry community, including the Complainant.

The Title IX Coordinator will consider the following factors, among others, when determining whether to honor the Complainant's wish that no resolution be pursued under these procedures:

- Whether the Respondent has a history of violent behavior or is a repeat offender
- Whether the incident represents escalation in unlawful conduct by the Respondent from previously noted behavior
- The increased risk that the Respondent will commit additional acts of violence
- Whether the Respondent used a weapon or force
- Whether the Complainant is a minor
- Whether Curry possesses other means to obtain evidence such as security footage
- Whether available information reveals a pattern of perpetration at a given location or by a particular group

Regardless of whether the Complainant chooses to file or participate in a Formal Complaint, the Title IX Coordinator will assist the Complainant with reasonable and available supportive measures, which may include academic, housing, transportation, employment, and other accommodations. (See, SMP, Supportive Measures, Section XVI.A.) Supportive measures provided to the Complainant may not unreasonably burden the Respondent.

Where no Formal Complaint has been filed and a requested supportive measure impacts the Respondent, the Title IX Coordinator will provide Respondent with written notice of the report, which includes, as known, the date, time, and location of the alleged Prohibited Conduct and the underlying factual allegations, including the identity of the Complainant. Therefore, certain supportive measures may not be available if the Complainant wishes to maintain anonymity.

Where the Complainant declines to participate in an investigation, Curry's ability to meaningfully investigate and respond to a report may be limited.

- Where Curry determines that the Complainant's request(s) can be honored
 - o Where the Title IX Coordinator determines that Curry can honor the Complainant's request that no Formal Complaint be pursued under these procedures, Curry may nevertheless take other appropriate steps designed to eliminate the reported Prohibited Conduct, prevent its recurrence, and address its effects on the Complainant and the Curry community.
 - o Those steps may include offering the Complainant reasonable and available accommodations, conducting targeted prevention and awareness training, and/or providing or imposing other supportive measures tailored to the circumstances. The Complainant may later choose to pursue a Formal Complaint. Upon receipt of new or additional information, the Title IX Coordinator may reconsider the Complainant's request that no Formal Complaint be pursued under these procedures and initiate the resolution process, as explained directly below.
- Where Curry determines that then Complainant's request(s) cannot be honored
 - o Where the Title IX Coordinator determines that Curry cannot honor the Complainant's request that no Formal Complaint be pursued under these procedures, the Title IX Coordinator will promptly initiate the resolution process under these procedures by making a signed, written Formal Complaint on behalf of Curry.
 - o The Title IX Coordinator will notify the Complainant that Curry intends to proceed with a Formal Complaint and will take immediate action as necessary to protect and assist the Complainant. The Title IX Coordinator will make reasonable efforts to protect the privacy of the Complainant. However, typically, the Complainant's identity would have to be disclosed as part of Curry's investigation.

- The Complainant is not required to participate in any proceedings that follow but will be treated as the Complainant in the process and will receive all required communications and opportunities to participate in the investigation and adjudication. However, if the Complainant declines to participate in an investigation and/or the adjudicative process under these procedures, Curry's ability to investigate meaningfully and respond to a report of Prohibited Conduct may be limited.

III. ADVISORS

At all stages under these procedures, both the Complainant and Respondent have the right to select and consult with an advisor of their own choosing. Complainants and Respondents should review the Sexual Misconduct Policy's provisions regarding consultants, advisors, and legal counsel to understand the resources available to them. (See, SMP, Section XIII.B)

Advisors and support persons may accompany the party to all meetings, such as investigative interviews and proceedings, but, except as provided in these procedures, may not speak on the party's behalf or otherwise interfere with meetings or proceedings.

During hearings, advisors may confer with the party, and on the party's behalf, at the time and in the manner prescribed by the Hearing Officer. Since Advisors will also conduct cross-examination of the opposing party(ies) and all witnesses, Advisors are required for the Hearing component of this process.

The party may choose among a panel of trained advisors to serve as the advisor in order to conduct examination and cross-examination at hearings, but can use an advisor of their choosing. If a party does not have an advisor present at the live hearing, Curry will provide, without fee or charge to that party, an advisor to question parties and witnesses and to conduct cross-examination on behalf of that party. If a party chooses not to use college-provided advisors to conduct cross-examination, Curry will not pay for the cost of other advisors retained by the party.

Throughout the proceedings, advisors and support persons may also help the party prepare written submissions

Curry will not interfere with the parties' rights to have an advisor of their choice; however, advisors and support persons must agree to adhere to these procedures. Where either the Title IX Coordinator or Hearing Officer determines that an advisor's conduct undermines the integrity of the policy or these procedures, the advisor will be prohibited from continuing to serve as advisor or support person in that case. The affected party will be permitted to obtain a substitute advisor or support person.

IV. WRITTEN SUBMISSIONS

For all written submissions permitted by these procedures, the documents must be submitted by a party. Written submissions from an advisor, or other individual made on behalf of a party, will not be included in the investigative or hearing records.

Where a form is available for a written submission, the party must use the form for the submission. Where required by these procedures, the party must sign the written submission.

V. NON-INVESTIGATORY MEASURES AVAILABLE UNDER THE TITLE IX PROCEDURES

Non-investigatory measures available under the Title IX Procedures include supportive measures, emergency removal procedures, and administrative leave. These are discussed in detail in the SMP, Section XVI.

VI. PENDING CRIMINAL INVESTIGATIONS

In cases where there is a criminal investigation, Curry process will run concurrently with such investigation. Curry may grant temporary delays reasonably requested by law enforcement for evidence gathering.

VII. NOTICE TO PARTIES UPON THE ISSUANCE OF A FORMAL COMPLAINT

The Title IX Coordinator will notify the Complainant and the Respondent, in writing, of the commencement of an investigation and provide both parties with a copy of the Formal Complaint and these procedures. The timeframe for this process begins with the filing of a Formal Complaint. The process [not including an appeal] will be concluded within a reasonably prompt manner, and no longer than one hundred and twenty (120) business days [includes Mondays-Fridays, excluding official federal and state holidays] after the filing of the Formal Complaint, provided that the process may be extended for a good reason, including but not limited to the absence or illness of a process administrator, such as the investigator or hearing officer, party, a party's advisor, or a witness; concurrent law enforcement activity; or the need for language assistance or accommodation of disabilities.

Depending on the complexity of the investigation, the severity and extent of the conduct alleged, or for other good cause, more or less time may be required to complete the process. The Director of Title IX and Institutional Equity will provide status updates either upon request or periodically throughout the formal process. Each party may request a one-time delay in the process of up to five (5) business days for good cause (granted or denied in the sole judgment of the Title IX Coordinator) provided that the requestor provides reasonable notice and the delay does not overly inconvenience other parties.

For example, a request to take a five day pause made an hour before a hearing for which multiple parties and their advisors have traveled to and prepared for shall generally not be granted, while a request for a five day pause in the middle of investigation interviews to allow a party to obtain certain documentary evidence shall generally be granted.

The notice of a Formal Complaint will include the following:

1. A notice of Curry's Title IX Procedures, including the option to participate in informal resolution procedures, and a hyperlink to a copy of the process
2. A notice of the allegations potentially constituting Prohibited Conduct, and sufficient details known at the time the notice is issued, such as the identities of the parties involved in the incident, if known, including the Complainant; the conduct allegedly constituting covered Prohibited Conduct; and the date and location of the alleged incident, if known
3. A statement that the Respondent is presumed not responsible for the alleged conduct and that a determination regarding responsibility is made at the conclusion of the Title IX procedures
4. A statement that the parties may have an advisor of their choice, who may be, but is not required to be, an attorney and who may inspect and review evidence and accompany the respective parties to meetings and proceedings
5. A statement that before the conclusion of the investigation, the parties may inspect and review evidence obtained as part of the investigation that is directly related to the allegations raised in the Formal Complaint, including the evidence upon which Curry does not intend to rely on reaching a determination regarding responsibility, and evidence that both tends to prove or disprove the allegations, whether obtained from a party or other source
6. Sanctions and remedies that may be imposed
7. The identity of the investigator
8. The range of resources available to the parties, including mental health and academic support resources
9. statement that retaliation is prohibited
10. Notice that the parties must preserve any potentially relevant evidence, whatever its form
11. The preponderance of evidence standard will be used to determine responsibility
12. Notice that the Curry Community Standards Handbook prohibits knowingly making false statements or knowingly submitting false information including during the Title IX process

If, in the course of an investigation, Curry decides to investigate allegations about the Complainant or Respondent that are not included in the Notice of Allegations and are otherwise covered Prohibited Conduct falling within these procedures, Curry will notify the parties whose identities are known of the additional allegations by their college email accounts or other reasonable means.

The parties will be provided sufficient time to review the additional allegations to prepare a response before any initial interview regarding those additional charges.

VIII. THE PARTIES' PARTICIPATION IN THE INVESTIGATION AND HEARING

Both the Complainant and the Respondent may decline to participate in the investigation and/or hearing. However, Curry may continue without a party's participation, reaching findings and issuing sanctions.

A. *Declining to Participate in the Investigation* If a party declines to participate in investigative interviews deemed necessary by the investigator, the Hearing Officer may not draw an inference about the determination regarding responsibility based solely on a party's or witness's failure to participate.

B. *Declining to Attend or Participate in the Hearing* Neither party is required to attend a hearing for the hearing to proceed. If, despite being notified of the date, time, and location of the hearing, either party is not in attendance, the hearing may proceed.

If neither a party nor their advisor appears at the hearing, Curry will provide, at Curry's expense, an advisor to appear on behalf of the non-appearing party to conduct an examination and cross-examination of a party or witness.

The Hearing Officer may not draw an inference about the determination regarding responsibility based solely on a party's or witness's absence from the live hearing or refusal to answer cross-examination or other questions. If a party or witness does not submit to cross-examination, the Hearing Officer will not rely on their statement in reaching a determination regarding responsibility.

IX. DISMISSAL OF A FORMAL COMPLAINT

A. *Mandatory Dismissal* the Title IX Coordinator must dismiss a Formal Complaint and close a case where

- a. there is no jurisdiction under these procedures because the conduct did not occur in Curry's education program or activity, or did not occur against a person in the United States; or
- b. the facts set forth in the Formal Complaint do not constitute Prohibited Conduct under these procedures even if proved.

If the alleged conduct would, if true, support a finding that another college policy has been violated, Curry may, in its sole authority, transfer the case for further handling under the appropriate policy.

If the Title IX Coordinator or the investigator determines that a Formal Complaint must be dismissed, they will provide the parties with a written decision explaining the reason for the dismissal.

B. *Discretionary Dismissal* the Title IX Coordinator may dismiss a Formal Complaint and close a case where

- a. the Complainant notifies the Title IX Coordinator in writing that the Complainant would like to withdraw the Formal Complaint or any allegations therein;
- b. the Respondent is no longer enrolled in or employed by Curry; or
- c. specific circumstances prevent Curry from gathering evidence sufficient to reach a determination as to the Formal Complaint or allegations therein. These circumstances could include, but are not limited to, the Complainant's failure or refusal to cooperate with the investigation such that the investigator is unable to investigate despite reasonable measures.

If the Title IX Coordinator determines that a Formal Complaint should be dismissed under this provision, they will provide the parties with a written decision explaining the reason for the dismissal.

C. *Review of the Title IX Coordinator's Decision to Dismiss a Formal Complaint* Both parties will be provided an opportunity to appeal. Appeals will be decided pursuant to the process described in Section XIX below. The decision on the appeal is final; there is no further right to appeal.

X. CONSOLIDATION OF REPORTS, FORMAL COMPLAINTS, AND HEARINGS UNDER THESE PROCEDURES

Generally, at the discretion of the Title IX Coordinator, multiple reports or Formal Complaints under these procedures arising out of the same factual circumstances may be joined in one investigation when

1. there is more than one Complainant or Respondent; or
2. a cross-complaint has been filed by a Respondent against a Complainant.

At the discretion of the Title IX Coordinator and in consultation with the investigator, multiple Formal Complaints, whether or not joined in one investigation, and multiple investigations under these procedures may be joined in one hearing if doing so is likely to result in reliable and more efficient outcomes without causing prejudice to a party or parties or confusion for the fact finders.

In determining whether to consolidate, the Title IX Coordinator will provide the parties with an opportunity to explain their preferences for consolidated or severed hearings. In all hearings involving multiple Respondents, the sanctions and remedies will be considered and imposed individually for each Respondent.

In the event that the allegations under the Sexual Misconduct Policy are made together with allegations of a violation of the Nondiscrimination Policy, Curry shall have the right, within its sole discretion, to consolidate those other allegations within one investigation and/or hearing.

Allegations of a violation of a separate policy are not required to be handled using the procedural requirements set forth in this policy but may be at the discretion of the Title IX Coordinator.

XI. INFORMAL RESOLUTION OF A FORMAL COMPLAINT

At any time after a Formal Complaint has been filed and before a hearing commences, the parties may seek to resolve a report of Prohibited Conduct through informal resolution, an administrative process.

Participation in an informal resolution process is entirely voluntary; the Title IX Coordinator will neither pressure nor compel either party to participate in the process or to agree to any specific terms.

In every case, the Title IX Coordinator has discretion to determine whether the matter is appropriate for informal resolution and to determine the appropriate terms. Informal resolution will not be offered to resolve allegations that an employee sexually harassed a student, and pursuant to Massachusetts law, to resolve complaints of sexual assault or sexual coercion, including rape and fondling.

If the parties agree to participate in an informal resolution process, the Title IX Coordinator will:

1. provide to the parties a written notice disclosing
 - i. the allegations;
 - ii. the requirements of the informal resolution process, including the circumstances under which it precludes the parties from resuming a Formal Complaint arising from the same allegations;
 - iii. that at any time prior to agreeing to a resolution, any party has the right to withdraw from the informal resolution process and resume the grievance process with respect to the Formal Complaint; and
 - iv. any consequences resulting from participating in the informal resolution process, including the records that will be maintained or could be shared;
2. obtain the parties' voluntary, written consent to the informal resolution process; and
3. not offer or facilitate an informal resolution process to resolve allegations that an employee sexually harassed a student.

The following additional conditions apply to this process:

1. Informal resolution will not include face-to-face meetings between the Complainant and the Respondent.
2. The parties are strongly encouraged, although not required, to consult with their advisors and any support persons during the entire informal resolution process.
3. If the process is terminated for any reason, the matter will be resolved pursuant to the Formal Complaint resolution process under these procedures. For this reason, the investigator will not participate in the informal resolution process.
4. The Title IX Coordinator will oversee the informal resolution process and will have access to all college and investigation records in the matter, including any records or reports prepared during an investigation.
5. If both parties are satisfied with the facilitator's recommendation, the matter will be resolved with a written agreement.
6. The facilitator will prepare an informal resolution agreement. Such terms may include, but are not limited to, any sanctions or remedies that could be imposed by a Hearing Officer after a hearing under these proceedings.
7. The Title IX Coordinator will provide each party, separately, with a copy of the proposed agreement for the party to review, sign, and return.
8. Once a party has returned the signed agreement to the Title IX Coordinator, the party has two (2) business days to reconsider and withdraw from the agreement by notifying the Title IX Coordinator in person or in writing.
9. Within the two (2) business days, if either party withdraws from the agreement, the matter would be returned for resolution of the Formal Complaint.

10. After the two (2) business days, if neither party withdraws, the terms of the agreement will become effective and the Title IX Coordinator will promptly notify both parties in writing that the agreement is final.

11. Once the agreement is effective, the parties may not appeal the agreement. The parties are expected to honor and comply with the terms of the informal resolution agreement. Noncompliance may be subject to proceedings under the Campus Code of Conduct or disciplinary procedures for faculty and staff.

12. If the process is terminated and the matter resolved pursuant to the Formal Complaint resolution process, neither the Title IX Coordinator nor the parties will disclose to the Hearing Officer or the Appeals Panel either the fact that the parties had participated in the informal resolution process or any information learned during the process.

XII. INVESTIGATION OF A FORMAL COMPLAINT

A. General Rules of Investigations

After the Title IX Coordinator issues a notice of complaint to the parties, a single investigator appointed by the Title IX Coordinator will perform an investigation under a reasonably prompt timeframe of the conduct alleged to be Prohibited Conduct.

Curry, and not the parties, has the burden of proof and the burden of gathering evidence, i.e., the responsibility of showing a violation of this policy has occurred. This burden does not rest with either party, and either party may decide not to share their account of what occurred or may decide not to participate in an investigation or hearing. This does not shift the burden of proof away from Curry and does not indicate responsibility.

The investigator cannot access, consider, or disclose medical records without a waiver from the party (or parent, if applicable) to whom the records belong or of whom the records include information.

The investigator will provide an equal opportunity for the parties to present witnesses, including fact and expert witnesses, and other inculpatory and exculpatory evidence (i.e., evidence that tends to prove and disprove the allegations) as described below.

Before all hearings, investigative interviews, or other meetings in which a party is invited or expected, the Title IX Coordinator will provide the party written notice of the date, time, location, participants, and purpose.

B. Investigative Interview Process

The investigator will gather information from the Complainant, the Respondent, and other individuals who have information that is directly related to the allegations in the Formal Complaint.

The parties will have the opportunity to request in writing witnesses they would like the investigator to interview and questions and topics they would like the investigator to ask witnesses, themselves, and the other party.

The investigator has the discretion to determine whether any proffered witnesses have information directly related to the allegations in the Formal Complaint, and, accordingly, the investigator will determine which witnesses to interview.

Investigative interviews with the parties and any witnesses will be audio recorded with the consent of the parties and witnesses. At the start of an interview session, the investigator will inform an interviewee that the session is being audio recorded and obtain their consent on the record.

The parties will be provided with transcripts of the interviews, and/or interview statements, but not audio recordings, of all witness and other party interviews.

All persons being interviewed, including the parties, are prohibited from recording interviews.

In the event of a failure rendering an audio recording of an interview inaudible in whole or in part, the investigator will either reconstruct the interview with input from the interviewee or re-conduct the interview, as the investigator deems necessary. The reconstructed interview statement will become part of the investigative record. The failure will not constitute grounds for appeal.

C. Evidentiary Materials

The investigator will gather relevant available evidentiary materials, including physical evidence, documents, communications between the parties, and electronic records and media as appropriate.

The parties will have the opportunity to request in writing the evidentiary materials they would like the investigator to seek to obtain.

The investigator has the discretion to determine whether the requested evidentiary materials are relevant to the allegation, and, accordingly, the investigator will determine what evidentiary materials to seek to obtain.

D. Expert Testimony and Materials

The investigator will provide an equal opportunity for the parties to present expert witnesses, including medical, forensics, technological, or other expert testimony and materials (such as writings and recordings).

The investigator has the discretion to determine the relevance and reliability of any expert testimony and materials, and, accordingly, the investigator will determine what, if any, expert testimony and materials will be included in the investigatory report.

E. Evidence to be Excluded or Redacted From the Record

Only relevant evidence (including both inculpatory and exculpatory—i.e., tending to prove and disprove the allegations—relevant evidence) will be evaluated, and irrelevant evidence will be included in the appendices to the report.

At the request of a party or witness, the investigator during the investigation or the Hearing Officer during the hearing process will exclude and, as necessary, redact content falling into one of the four categories enumerated below.

1. Records maintained by a mental health or medical professional or paraprofessional without the party's written consent: Generally, during both the investigation and any hearing to determine responsibility, participants in this process may exclude evidence of their own mental or physical health diagnosis and/or treatment.
2. Information related to a legally recognized and unwaived privilege, such as attorney client communications.

The investigator during the investigation and the Hearing Officer during the hearing process will also exclude and, as necessary, redact content that is impermissible under applicable law or these procedures.

Exclusions and redactions will be noted and thereby become part of the investigative record. Excluded or redacted content not included in the investigative record will not be considered by the Hearing Officer.

The parties should make all requests for exclusions and redactions to the investigator during the investigation prior to the issuance of the final investigative record and report.

F. Inspection and Review of Evidence

Prior to the completion of the investigation, the parties will have an equal opportunity to inspect and review the evidence obtained through the investigation. The purpose of the inspection and review process is to allow each party the equal opportunity to meaningfully respond to the evidence prior to conclusion of the investigation.

Evidence that will be available for inspection and review by the parties will be any evidence that is directly related to the allegations raised in the Formal Complaint.

It will include any:

1. evidence that is relevant, even if that evidence is not ultimately relied upon by Curry in making a determination regarding responsibility; and
2. inculpatory or exculpatory evidence (i.e., evidence that tends to prove or disprove the allegations) that is directly related to the allegations, whether obtained from a party or other source.

Curry will send the evidence made available for each party and each party's advisor, if any, to inspect and review through an electronic format. Curry is not under an obligation to use any specific process or technology to provide the evidence and shall

have the sole discretion in terms of determining format and any restrictions or limitations on access.

The investigative record shall include:

1. transcripts/statements/summaries of all interviews by the investigator with the parties and any witnesses; and
2. copies of any documents, electronic records, and media and photographs or descriptions of physical materials collected during the course of the investigation, except those that are excluded pursuant to paragraph XII.E, whether or not the investigator intends to rely on such information in the investigative report.

The parties will have ten (10) business days to inspect and review the evidence and submit a written response by email to the investigator. Parties may request a reasonable extension to this deadline.

This response may include:

1. Provision of additional evidence
2. Comments about content, including requests for redaction
3. Requests for additional meetings with the investigator
4. Requests for the investigator to conduct further investigation and/or questioning of additional witnesses
5. Any objections to the relevance of certain evidence

The Title IX Coordinator will provide copies of the parties' written responses, including any additional evidence, to the investigator, all parties, and their advisors.

Any evidence subject to inspection and review will be available at any hearing, including for purposes of cross-examination.

The parties and their advisors must sign an agreement not to disseminate any of the evidence subject to inspection and review or use such evidence for any purpose unrelated to the Title IX procedures. The parties and their advisors agree not to photograph or otherwise copy the evidence.

G. Inclusion of Evidence Not Directly Related to the Allegations

Evidence obtained in the investigation that is determined in the reasoned judgment of the investigator not to be directly related to the allegations in the Formal Complaint will be included in the appendices to the investigative report.

H. Investigative Report

The investigator will create an investigative report that fairly summarizes relevant evidence. The investigative report is not intended to catalog all evidence obtained by the investigator but only to provide a fair summary of that evidence.

Only relevant evidence (including both inculpatory and exculpatory—i.e., tending to prove and disprove the allegations—relevant evidence) will be referenced in the

investigative report, and irrelevant evidence will be included in the appendices to the report. The investigator will not render an opinion with respect to responsibility.

I. Review of the Final Investigative Record and Report

Upon completion, the final investigative record and report will be provided to the parties and their advisors to inspect and review in electronic form. The parties will have an opportunity to review and comment on the final investigative record and report at least ten (10) business days prior to the hearing and will continue to have access to such materials throughout the hearing.

The parties may submit a written response to the report that will be considered by the Hearing Officer and will become part of the final investigative record. At the hearing, the Hearing Officer will rely upon the relevant evidence in the final investigative record as well as any additional statements and information provided to the Hearing Officer pursuant to the procedures set forth below.

The investigator has discretion whether to conduct any additional requested meetings, interviews, or questioning identified in the parties' responses.

XIII. HEARINGS

A. Overview of Hearing Process

Curry will not issue a disciplinary sanction arising from an allegation of covered Prohibited Conduct within the jurisdiction of these procedures without holding a live hearing, unless the matter is otherwise resolved through an informal resolution process.

The live hearing may be conducted with all parties physically present in the same geographic location, or, at Curry's sole discretion, any or all parties, witnesses, and other participants may appear at the live hearing virtually through remote video-conferencing. This technology will enable participants simultaneously to see and hear each other. At its discretion, Curry may delay or adjourn a hearing based on technological errors not within a party's control.

All proceedings will be recorded through audio recording and/or transcript. That recording or transcript will be made available to the parties for inspection and review. Prior to obtaining access to any hearing materials, the parties and their advisors must sign an agreement not to disseminate any of the testimony heard or evidence obtained in the hearing or use such testimony or evidence for any purpose unrelated to the Title IX Procedures. Once signed, this agreement may not be withdrawn.

B. Continuances or Granting Extensions

The Title IX Coordinator may determine that multiple sessions or a continuance (i.e., a pause on the continuation of the hearing until a later date or time) is needed to complete a hearing. If so, the Title IX Coordinator will notify all participants and endeavor to accommodate all participants' schedules and complete the hearing as promptly as practicable.

C. Participants in the Live Hearing

Live hearings are not public, and the only individuals permitted to participate in the hearing are the Complainant and Respondent (the parties).

1. The parties cannot waive the right to a live hearing, except that both parties may agree to do so through a documented Informal Resolution Process.
2. Curry may still proceed with the live hearing in the absence of a party, and may reach a determination of responsibility in their absence.
3. Curry will not threaten, coerce, intimidate, or discriminate against the party in an attempt to secure the party's participation.

D. The Hearing Officer

1. The decision-maker will be a single Hearing Officer appointed by the Title IX Coordinator, who shall receive annual training as required by law.
2. No Hearing Officer will also have served as the Title IX Coordinator, Title IX investigator, or advisor to any party in the case, nor may the Hearing Officer serve on the appeals body in the case.
3. No Hearing Officer will have a conflict of interest or bias in favor of or against Complainants or Respondents generally, or in favor or against the parties to the particular case.
4. The Hearing Officer will be trained on topics that include how to serve impartially, issues of relevance, including how to apply the rape shield protections provided for Complainants, and any technology to be used at the hearing.
5. The parties will have an opportunity to raise any objections regarding a Hearing Officer's actual or perceived conflicts of interest or bias prior to the commencement of the live hearing.
6. The Hearing Officer has broad discretion.

E. Advisor of Choice

1. The parties have the right to select an advisor of their choice, who may be, but does not have to be, an attorney.
2. The advisor of choice may accompany the parties to a hearing, but may not speak for the party, except for the purpose of conducting cross-examination.
3. In addition to selecting an advisor to conduct cross-examination, the parties may select an advisor who may accompany the parties to any meeting or hearing they are permitted to attend, but may not speak for the party. Only one advisor may be present during a hearing; thus, if a second advisor is chosen to conduct cross-examination, only that advisor may be present during that portion of the hearing.
4. The parties are not permitted to conduct cross-examination; it must be conducted by the advisor. As a result, if a party does not select an advisor, Curry will select an advisor to serve in this role for the limited purpose of conducting the cross-examination at no fee or charge to the party.
5. The advisor is not prohibited from having a conflict of interest or bias in favor of or against Complainants or Respondents generally, or in favor or against the parties to the particular case.
6. The advisor is not prohibited from being a witness in the matter.
7. If a party does not attend the live hearing, the party's advisor may appear and conduct cross-examination on their behalf.

8. If neither a party nor their advisor appear at the hearing, Curry will provide an advisor to appear on behalf of the non-appearing party.

F. Witnesses

1. Witnesses cannot be compelled to participate in the live hearing, and have the right not to participate in the hearing free from retaliation.
2. The Hearing Officer may not draw an inference about the determination regarding responsibility based solely on a witness's absence from the live hearing or refusal to answer cross-examination or other questions. If a witness does not submit to cross-examination, the Hearing Officer will not rely on their statement in reaching a determination regarding responsibility.

G. Presumption of Non-Responsibility and Standard of Proof

The Respondent will be presumed “not responsible” unless and until a Hearing Officer determines the Respondent is responsible.

The Hearing Officer will determine whether the Respondent is responsible by using a preponderance of the evidence standard. This means that to find the Respondent responsible for any Prohibited Conduct, the Hearing Officer must be satisfied, based upon the hearing record, that it is more likely than not that the Respondent committed all of the elements of the alleged Prohibited Conduct.

H. Notice of Hearing

At the completion of an investigation, if a case is referred to the Hearing Officer for a hearing, a Notice of Hearing will be sent to the parties as soon as practicable.

The notice will include the charges at issue; a brief summary of the alleged Prohibited Conduct; the date, time, place, and purpose of the hearing; and the name of the Hearing Officer. All efforts will be made to provide the Notice of Hearing no later than five (5) business days prior to the hearing and to schedule the hearing as soon as practicable.

I. Request to Reschedule Hearing

Either party may request to have a hearing rescheduled. Absent extenuating circumstances, requests to reschedule must be submitted at least three (3) business days prior to the hearing. A request to reschedule a hearing must be supported by a compelling reason for the delay.

Given the number of individuals involved in a hearing, and the attendant difficulty of scheduling and rescheduling them in a timely manner, it may not be possible to accommodate all scheduling requests. The Hearing Officer may also reschedule a hearing, without a request by the parties, when there is reasonable cause to do so.

J. Pre-Hearing Submissions by the Parties

Prior to a hearing, the parties will be asked in writing by the Title IX Coordinator to make certain decisions and requests regarding the conduct of the hearing. This process is designed to ensure that the hearing is conducted in as equitable, respectful, and efficient a manner as possible.

There are two stages at which the parties will be asked to make Pre-hearing Submissions.

1. First, the parties will be asked to submit in writing (1) opening statements and (2) names of any requested witnesses.
2. Second, once witnesses are approved, the parties will be asked to submit in writing any proposed questions or topics for individuals who might testify, including themselves, as explained below.

All Pre-hearing Submissions are waived if not completed by the stated deadlines, including any approved extensions. Prior to the hearing, the Title IX Coordinator will distribute each party's Pre-hearing Submissions to the other party for their review.

First Pre-hearing Submission—Written Opening Statements and Witness Requests

- A. Upon providing the parties with copies of the final investigative record and report, the Title IX Coordinator will instruct the parties, in writing, that they have the opportunity to prepare a written opening statement and submit a written list of proposed witnesses.
- B. The parties will be given ten (10) business days for such submissions.
- C. 3. Within the ten (10) business days, the parties may request extensions that will be granted, if reasonable, at the discretion of the Title IX Coordinator. Any extension granted to one party will be granted to the other party. Delays simply to prolong the process will not be permitted.
 - a. Written Opening Statements
 - i. The parties may prepare a written opening statement, not to exceed 2,500 words. These statements are the parties' opportunity to tell the Hearing Officer why they should find in the party's favor. These statements must be signed by the parties. In presenting their statements, the parties should be responsive to the investigative record by directly addressing and responding to specific information contained in the investigative record and citing specific page numbers. The parties may want to call the Hearing Officer's attention to specific interview statements or evidentiary materials contained in the investigative record. Again, the parties should include specific page citations to the final investigative record.
 - ii. The parties may not add or address information not contained in the investigative record
 - b. Witness Requests
 - i. All interview statements contained in the final investigative record become part of the hearing record and are before the Hearing Officer. If a party wants the Hearing Officer to hear directly from a witness, the party must submit a written request within the ten (10) business days. Such a request should include:
 1. The names of proposed witnesses, including the investigator, if the party requests that the investigator testify

2. For each proposed witness an explanation of why the individual's presence is relevant and helpful to the Hearing Officer in determining responsibility

Second Pre-hearing Submission—Questions and Topics

1. The Hearing Officer will review the parties' witness requests and will decide which witnesses will be asked to provide testimony at the hearing. The Hearing Officer may call witnesses not requested by the parties.
2. The parties will be provided with a witness list and informed in writing that they have an opportunity to propose, also in writing:
 - a. Questions and topics for the witnesses.
 - b. Questions and topics for themselves and the other party. The parties are not required to commit to testifying at this juncture but are encouraged to prepare for the eventuality that they and the other party would testify by submitting proposed questions and topics.
3. The Hearing Officer will establish a reasonable deadline for the submissions, typically no longer than five (5) business days.
4. Within the deadline established by the Hearing Officer, the parties may request extensions that will be granted, if reasonable, at the discretion of the Hearing Officer. Any extension granted to one party will be granted to the other party. Delays simply to prolong the process will not be permitted.
5. The Hearing Officer will determine which of the parties requested questions will be asked or topics covered.
6. The Hearing Officer will approve in substance all questions or topics that are relevant and that are not prohibited by these procedures or applicable laws, unduly prejudicial, or cumulative of other evidence.
7. At the hearing, the Hearing Officer will ask pre-approved questions of the parties and witnesses, and the parties' advisors will be permitted to cross-examine the opposing party and the witnesses

XIV. HEARING PROCESS AND FORMAT

A. Overview of Hearing Process and Format

All hearings will be private. The only persons present will be the parties, their advisor, witnesses (when testifying), the Hearing Officer, the Title IX Coordinator and any staff necessary for the conduct of the hearing.

If the hearing is not conducted virtually, the parties with any advisors will be in separate, private rooms, with the hearing officer in a separate room. Even if conducted virtually, parties will be limited to having one advisor present with them during the hearing and will participate via a secure audio-visual connection.

At all times while providing testimony the parties will be able to see and hear each other. Witnesses may participate, either remotely or in the physical presence of the Hearing Officer, only for their own testimony, and the parties will be able to see and hear this testimony.

The Hearing Officer may establish reasonable time limits, rules, and format, providing the parties with equal opportunities to participate. The Hearing Officer may adjourn the hearing, once commenced, and later reconvene the hearing in consideration of factors that include but are not limited to the unavailability of a witness, party, Hearing Officer, or needed personnel; inclement weather; or in order to make an evidentiary or procedural ruling. Formal rules of evidence will not apply

B. Hearing Procedures

For all live hearings conducted under this Title IX Procedure, the procedure will be as follows:

1. The Hearing Officer will open and establish rules and expectations for the hearing.
2. The Parties will each be given the opportunity to provide opening statements.
3. The Hearing Officer will ask questions of the parties and witnesses.
4. Each parties' advisor will be given the opportunity for live cross-examination of parties and witnesses after the Hearing Officer conducts their initial round of questioning. During the parties' cross-examination conducted by their advisors, the Hearing Officer will have the authority to pause cross-examination at any time for the purposes of asking Hearing Officer's own follow up questions, and any time necessary in order to enforce the established rules of decorum.
5. Should a party or the party's advisor choose not to cross-examine a party or witness, the party shall affirmatively waive cross-examination through a written or oral statement to the Hearing Officer. A party's waiver of cross-examination does not eliminate the ability of the Hearing Officer to use statements made by the party who was not cross-examined.

C. Live Cross-examination Procedure

Each party's advisor will conduct live cross-examination of the other party or parties and witnesses. During this live cross-examination the advisor will ask the other party or parties and witnesses relevant questions and follow-up questions, including those challenging credibility directly, orally, and in real time. During questioning by the parties' advisors, the Hearing Officer, will, for each question asked, make a determination whether the question seeks relevant information or poses a related follow-up question. If the question is not seeking relevant information or is not a related followup question, the Hearing Officer will disallow the question and will explain the reason why a question is not relevant.

D. Review of Hearing Transcript

The transcript or audio recording of the hearing will be available for review by the parties within ten (10) business days, unless there are any extenuating circumstances. These will be provided electronically.

XV. DETERMINATION REGARDING RESPONSIBILITY

A. Standard of Proof

Curry uses the preponderance of the evidence standard for investigations and determinations regarding responsibility of Formal Complaints covered under this policy.

B. General Considerations for Evaluating Testimony and Evidence

While the opportunity for cross-examination is required in all Title IX hearings, determinations regarding responsibility may be based in part, or entirely, on documentary, audiovisual, and digital evidence, as warranted in the reasoned judgment of the Hearing Officer.

Hearing Officers shall not draw inferences regarding a party's or witness's credibility based on the party's or witness's status as a Complainant, Respondent, or witness, nor shall they base their judgments in stereotypes about how a party or witness would or should act under the circumstances.

Generally, credibility judgments should rest on the demeanor of the party or witness, the plausibility of their testimony, the consistency of their testimony, and its reliability in light of corroborating or conflicting testimony or evidence.

Credibility judgments should not rest on whether a party's or witness's testimony is non-linear or incomplete, or if the party or witness is displaying stress or anxiety. Decision-makers will afford the highest weight relative to other testimony to first-hand testimony by parties and witnesses regarding their own memory of specific facts that occurred.

Both inculpatory and exculpatory (i.e., tending to prove and disprove the allegations) evidence will be weighed in equal fashion.

A witness's testimony regarding third-party knowledge of the facts at issue will be allowed, but will generally be accorded lower weight than testimony regarding direct knowledge of specific facts that occurred. Parties may call "expert witnesses" for direct and cross-examination and the Hearing Officer may award such evidence the weight they deem appropriate.

While the expert witness will be allowed to testify and be cross-examined, the decision-maker will be instructed to afford lower weight to non-factual testimony of the expert relative to fact witnesses, and any expert testimony that is not directed to the specific facts that occurred in the case will be afforded lower weight relative to fact witnesses, regardless of whether the expert witness testimony is the subject of cross-examination and regardless of whether all parties present experts as witnesses.

The following information will not be considered by the Hearing Officer:

1. Questions and evidence about the Complainant's sexual predisposition or prior sexual behavior are not relevant, unless such questions and evidence about the Complainant's prior sexual behavior are offered to prove that:

- a. someone other than the Respondent committed the conduct alleged by the Complainant; or
- b. if the questions and evidence concern specific incidents of the Complainant's prior sexual behavior with respect to the Respondent and are offered to prove consent.

C. Closing Statements

The parties may provide both oral and written closing statements. This is the opportunity for the parties to marshal the evidence in the hearing record and suggest inferences and conclusions.

The parties may not add or address information not contained in the hearing record, nor may the parties address issues that pertain to sanctions and remedies. The Hearing Officer does not consider these issues when determining responsibility. The Hearing Officer will establish a time limit for brief oral closing statements, typically around five (5) minutes.

The Hearing Officer will also set the schedule for submission of written closing statements. The parties should assume that deliberations will commence immediately following the hearing, in which case the parties will be expected to submit written closing statements shortly after the oral closing statements. Each party's written statement will be limited to 2,000 words and to the evidence contained in the investigative record and hearing.

The written statements will be distributed to the other party and the Hearing Officer for their review.

These statements must be signed by the parties.

D. Deliberations on Findings of Responsibility

After closing arguments, the Hearing Officer will make one of the following determinations about responsibility using the preponderance of the evidence standard:

1. the Respondent is responsible for violating this policy;
2. the Respondent is not responsible for violating this policy; or
3. there is insufficient information to determine whether the Respondent is responsible for violating this policy.

E. Sanctions and Remedies

The Hearing Officer that finds the Respondent responsible will refer the matter to Assistant Vice President for the Student Experience & Dean of Students (for students), Vice President of Human Resources (for employees), or the Provost and Executive Vice President for Academic Affairs (for faculty) with sanction and/or remedy recommendations for their adoption and implementation.

If the matter is referred for a determination of sanctions and/or remedies, the parties will be provided the opportunity to submit Impact or Mitigation statements to the TIX Coordinator. Potential sanctions that may be imposed upon

referral are listed in the Sexual Misconduct Policy, Appendix B. Impact statements allow the complainant to describe the physical, emotional, and academic or professional toll of the misconduct, while mitigation statements allow the respondent to present context, rehabilitative efforts, or factors for leniency.

These statements are not required. The Hearing Officer will recommend measures that Curry can take on campus to restore or preserve the parties equal access to Curry of such Prohibited Conduct.

F. Hearing Officer's Decision

- a. **Timeline of Determination Regarding Responsibility** If there are no extenuating circumstances, the determination regarding responsibility and referral for sanctions and remedies, will be issued by the Hearing Officer within twenty (20) business days of the completion of the hearing.
- b. **Finality** The determination regarding responsibility, referral for sanctions and remedies becomes final either on the date that Curry provides the parties with the written determination of the result of the appeal, if an appeal is filed consistent with the procedures and timeline outlined in “Appeals” below, or if an appeal is not filed, the date on which the opportunity to appeal expires.
- c. **Contents of Determination**
 - i. The written Determination Regarding Responsibility will include:
 1. The determination regarding responsibility, referral for sanctions and remedies becomes final either on the date that Curry provides the parties with the written determination of the result of the appeal, if an appeal is filed consistent with the procedures and timeline outlined in “Appeals” below, or if an appeal is not filed, the date on which the opportunity to appeal expires.
 2. a description of the procedural steps taken from the receipt of the Formal Complaint through the determination, including any notifications to the parties, interviews with parties and witnesses, site visits, methods used to gather other evidence, and hearings held;
 3. findings of fact supporting the determination; and
 4. conclusions regarding which section of the Sexual Misconduct Policy, if any, the Respondent has or has not violated.
 - ii. For each allegation:
 1. a statement of, and rationale for, a determination regarding responsibility;
 2. a statement of, and rationale for, any recommended referral for determination of sanctions;
 3. a statement of, and rationale for, any referral for remedies designed to restore or preserve equal access to Curry’s education program or activity; and
 4. Curry’s procedures and the permitted reasons for the Complainant and Respondent to appeal (described below in “Appeal”).

Note Hearing Officer does not determine which sanctions or remedies to impose but refers the matter to the appropriate Sanctions Officer, which is dependent on status of the Respondent, with a recommendation for sanctions, if appropriate.

G. Hearing Record

An audio recording will be made of all hearings. These recordings will be provided electronically.

In the event of any failure rendering the audio recording of the hearing inaudible in whole or in part, the record will be recreated as necessary, whether in its entirety or for any inaudible portions, with input from the parties, any witnesses whose testimony is at issue, and the Hearing Officer. In this case, a transcript of the Hearing will be provided. Such failure will not constitute grounds for appeal.

Individuals appearing before the Hearing Officer, whether as a party or witness, are prohibited from recording any portion of the hearing. The hearing record will include: the audio recording of the hearing, a transcript of the hearing, the Hearing Officer's decision, the final investigative record and report, the parties' pre-hearing submissions, the written witness list, written opening and closing statements, and written submissions permitted by these procedures made to the Hearing Officer or during the hearing.

XVI. WITHHOLDING DEGREES

At the discretion of the Provost and Executive Vice President for Academic Affairs or their designee, a student may not register for classes, participate in room draw, participate in Commencement, or receive a degree if they have not completed or complied with sanctions imposed under this policy or if an investigation is in process. Curry may withhold awarding a degree otherwise earned until the completion of procedures set forth in this policy, including the completion of any sanctions imposed.

XVII. CONFLICT OF INTEREST

No Title IX Coordinator, Informal Resolution Facilitator, Investigator, Hearing Officer, Appeal Officer, or any person designee should have a conflict of interest or bias for or against either party generally or an individual party. Upon receipt of written notice of the identity of the Title IX Coordinator, Informal Resolution Facilitator, Investigator, Hearing Officer, Appeal Officer, or designee, if a party believes that they have a potential conflict of interest, the party should notify the Title IX Coordinator (or their designee if the conflict is with the Title IX Coordinator).

The notification must be in writing, made within two (2) business days of the notice, and include facts substantiating the claim of conflict. Action will be taken to cure the conflict of interest. After two (2) business days have passed, the Title IX Coordinator, Informal Resolution Facilitator, Investigator, Hearing Officer, Appeal Officer, or designee will become final, and there will be no further opportunity to raise potential conflicts of interest.

XVIII. IMPOSITION OF SANCTIONS AND REMEDIES

If the Hearing Officer finds the Respondent responsible for violating the policy, and a referral for determination of sanctions and/or remedies has been made by the Hearing Officer, the matter shall be referred by the Title IX Coordinator to the officials noted below for consideration of sanctions. The parties are invited to submit an Impact/Mitigation statement within five (5) business days after being notified to do so and the statements will be distributed to both parties.

A. Complaints Against Faculty or Staff

If the responding party is a faculty or staff member, the Hearing Officer's decision and referral for sanctions will be provided to the appropriate administrator for further consideration as follows:

1. Faculty: In accordance with the CBA, the Provost and Executive Vice President for Academic Affairs will consider the Decision-Maker's recommendations and the parties' Impact/Mitigation statements, if any, and will determine the appropriate sanction.
2. Staff: staff, the Vice President for Human Resources will consider Decision-Maker's recommendations and the parties' Impact/Mitigation statements, if any, and will determine the appropriate sanction.

The administrator shall make a written determination of sanctions within ten (10) business days of referral of the matter from the Title IX Coordinator. The written statement must contain the rationale for, as to each allegation, any disciplinary sanctions that will be imposed on the Respondent, and whether remedies designed to restore or preserve equal access to the recipient's education program or activity will be provided by Curry to the Complainant.

The Title IX Coordinator shall provide to both parties simultaneously in writing through their College email account or such other appropriate means:

- the written determination of the Hearing Officer;
- the written determination of the sanction officer;
- Curry's procedures for the Complainant and Respondent to appeal the results; and
- remedies designed to restore or preserve the Complainant's equal access to Curry, if any.

B. Complaints Against Students Imposition of Sanctions

The matter shall be referred to the Assistant Vice President for the Student Experience and Dean of Students, who shall consider the imposition of sanctions after considering the parties' Impact/Mitigation statements, if any.

The Assistant Vice President for the Student Experience and Dean of Students shall make a determination of sanctions within ten (10) business days of referral of the matter from the Title IX Coordinator. The written statement must contain the rationale for, as to each allegation, any disciplinary sanctions that will be

imposed on the Respondent, and whether remedies designed to restore or preserve equal access to the recipient's education program or activity will be provided by Curry to the Complainant.

The Title IX Coordinator shall provide to both parties simultaneously in writing through their College email account or such other appropriate means:

- the written determination of the Hearing Officer;
- the written determination of the sanction officer;
- Curry's procedures for the complainant and respondent to appeal the results, if such procedures are available; and
- remedies designed to restore or preserve the Complainant's equal access to Curry, if any.

C. List of Sanctions

Potential sanctions that may be imposed on employees and students are identified in Appendix B to the Sexual Misconduct Policy.

XIX. APPEAL OF A HEARING OFFICER DECISION, DISMISSAL OF FORMAL COMPLAINT AND IMPOSITION OF SANCTIONS

Each party may appeal (1) the dismissal of a Formal Complaint or any included allegations and/or (2) a determination regarding responsibility and imposition of sanctions. To appeal, a party must submit their written appeal to the TIX Coordinator, or designee, who will then refer the appeal to an outside Appellate Decisionmaker, within ten (10) business days of being notified of the decision and sanctions, if any, indicating the grounds for the appeal.

Dismissals of formal complaints are appealed to the Appeal Officers described in this section. Appeals that are timely and state proper grounds for appeal, as determined by the Title IX Coordinator (or their designee), will be decided by an Appeals Officer who has been trained in the Sexual Misconduct Policy, Title IX Procedures, the scope of Curry's education program or activity, how to conduct an investigation and grievance process including hearings, appeals, and informal resolution processes, and how to serve impartially, including by avoiding prejudgment of the facts at issue, conflicts of interest, and bias.

The Appeal Officer will be a different individual from those who served as the Hearing Officer. The Appeal Officer may be a College employee or someone from outside of Curry chosen at the sole discretion of the Title IX Coordinator (or their designee), who will communicate the name to the parties. All appeals will be based solely upon the hearing record and impact statements, if any.

When relevant to a stated ground for appeal, the appellate decisionmaker may supplement the record on appeal with evidentiary materials excluded or redacted from the investigative record or newly discovered evidence.

Appeals may be brought only upon one or more of the following grounds:

1. Procedural irregularity that affected the outcome of the matter.
2. New evidence that was not reasonably available at the time the determination regarding responsibility or dismissal was made that could affect the outcome of the matter.
3. The Title IX Coordinator, investigator, or Hearing Officer had a conflict of interest or bias for or against Complainants or Respondents generally or the individual Complainant or Respondent that affected the outcome of the matter.
4. The sanction(s) imposed are disproportionate for the facts of the case and/or the violation of the policy that was found.

The appealing party commences an appeal by submitting a written statement to the Title IX Coordinator within ten (10) business days of service of the notice of dismissal of a complaint or Hearing Officer's decision and sanctions determination.

Within the ten (10) business days, the appealing party may request an extension of time by submitting a request to the Title IX Coordinator explaining the reason(s) for the request. The Appeal Officer will have discretion to grant such a request upon a finding of good cause for the delay. Failure to submit an appeal within the ten (10) business days or any approved extension constitutes waiver of the right to appeal.

The appeal statement must set forth:

1. the determination(s) and/or sanction being appealed;
2. the specific ground(s) for the appeal;
3. the facts supporting the grounds; and

A copy of the appeal statement will be provided to the other party, who within ten (10) business days may submit a written response to the Appeal Officer. The response should address both the specific ground(s) for appeal set forth in the appealing party's statement and the specific facts asserted by the appealing party.

The Appeal Officer will establish a reasonable schedule for issuing a written decision, typically no later than twenty (20) business days after receipt of the non-appealing party's submission or the time for submission has expired. The decision will be final and binding. Any decision will be based solely upon the hearing record and, in appropriate cases, upon a showing of new evidence relevant to the ground for appeal. The decision will include the rationale for the decision.

The appellate decisionmaker may affirm the decision of the Hearing Officer or sustain any of the above- specified grounds for appeal, in which case the decision-maker may:

1. Reinstate a Formal Complaint that has been dismissed
2. Reverse or modify a finding of responsibility
3. Change or modify a sanction
4. Remand a case to the hearing officer for clarification or reconsideration consistent with the appellate decisionmaker's decision, if doing so would assist with a timely, practicable, and efficient resolution of the case
5. Remand a case for a new hearing to either the original hearing officer or a different hearing officer

6. Remand a case for a new or additional investigation, followed by an adjudication consistent with these procedures, to either the original investigator or to a new investigator

If the Appellate decisionmaker calls for the admission of new evidence, it will remand the case to the Hearing Officer from which it originated for a new hearing, if it deems it necessary to do so.

XX. IMPOSITION AND ENFORCEMENT OF SANCTIONS AND REMEDIES

The Title IX Coordinator will be responsible for ensuring that any sanctions imposed are implemented and completed. This may require contacting college employees in a position to enforce or monitor sanctions, such as members of Public Safety, the Director of Residence Life & Housing, or an employment supervisor.

In contacting such persons, the Title IX Coordinator will only disclose as much information as is necessary to ensure that the sanctions are enforced or monitored. The Title IX Coordinator will be responsible for implementing any remedies deemed necessary. Remedies may include the extension of supportive measures previously put in place, and shall be designed to provide equal access to the Complainant to Curry's programs and activities.

A decision to impose remedies is not appealable by either party. The Respondent shall be notified of the implementation of any remedies that affects the Respondent. The implementation of remedies is not subject to appeal and is final.

Investigation and Resolution Procedures for the Resolution of Reports Alleging Sexual Misconduct Outside the Scope of Title IX and other Prohibited Conduct (“Non-Title IX Procedures”)

(Section Revised and Effective August 2026)

I. SCOPE OF THESE PROCEDURES

Under the United States Department of Education’s Title IX Regulations, published May 19, 2020, the department established procedures that are applicable to the investigation and resolution of a narrow category of sexual misconduct cases. Reports of Prohibited Conduct under Curry’s Sexual Misconduct Policy that meet the definitions and jurisdictional elements set forth in the regulations are resolved under the Procedures for the Resolution of Reports Alleging Sexual Misconduct Falling Within the Scope of Title IX (“Title IX Procedures”).

Reports of Prohibited Conduct under Curry’s Sexual Misconduct Policy that do not meet the jurisdictional requirements of the new regulations will be resolved through this procedure (“Non-Title IX Procedures”). This does not mean that any case is more or less important but instead a reflection of federal regulations that apply only to a specifically identified set of cases. Definitions in the Sexual Misconduct Policy will apply to these procedures.

II. NON-TIX PROCEDURES

These procedures are a college administrative process, not a criminal law process.

A. Preliminary Assessment of Report⁴ and Provision of Supportive Measures

If the report falls within the jurisdiction of these procedures the Title IX Coordinator will take the following actions:

1. **Response Where the Complainant’s Identity Is Known** Where the identity of the Complainant is known, the Title IX Coordinator will promptly contact the Complainant to discuss the availability of supportive measures, inform the Complainant of the availability of supportive measures with or without the filing of a formal complaint, and explain to the Complainant the process for filing a formal complaint.

The Title IX Coordinator will also offer the Complainant supportive measures designed to restore or preserve equal access to Curry’s education programs or activities and will consider the Complainant’s wishes with respect to these measures. (See, SMP, Supportive Measures, Section XVI.A.)

⁴ The term “report” is defined in the Sexual Misconduct Policy (page 12).

2. **Response Where the Complainant's Identity is Unknown**

Where a report is filed but the identity of the Complainant is unknown, the Title IX Coordinator will assess the nature and circumstances of the report, including whether it provides information that identifies the potential Complainant, the potential Respondent, any witnesses, and/or any other third party with knowledge of the reported incident, and take reasonable and appropriate steps to respond to the report of Prohibited Conduct consistent with applicable federal and state laws and these procedures.

3. **Response Where the Respondent's Identity is Known** Where a report is filed but the identity of the Respondent is unknown, the Title IX Coordinator will assess the nature and circumstances of the report, including whether it provides information that identifies the potential Respondent, any witnesses, and/or any other third party with knowledge of the reported incident, and take reasonable and appropriate steps to respond to the report of Prohibited Conduct consistent with applicable federal and state laws and these procedures.

4. **Curry's Actions Following an Initial Assessment with Known Complainant Where the Complainant Seeks Resolution Under These Procedures** In any case where the Complainant reports Prohibited Conduct and requests resolution under these procedures, the Title IX Coordinator will promptly initiate an investigation. This process begins with the Complainant making a signed, written Formal Complaint. A formal complaint must be filed with the Title IX Coordinator, and may be filed in person, by mail, or by electronic mail, addressed to the Title IX Coordinator.

A. Where the Complainant Requests That No Formal Complaint Be Pursued Under These Procedures Curry supports any Complainant's decision not to pursue a Formal Complaint under these procedures.

Where the Complainant does not wish to pursue a Formal Complaint under these procedures, the Curry will honor the Complainant's wishes unless doing so would not adequately mitigate the risk of harm to the Complainant or other members of the Curry community or when doing so will fail to restore members of the Curry community, including the Complainant's to Curry's programs and activities.

The Title IX Coordinator will consider the following factors, among others, when determining whether to honor the Complainant's wish that no resolution be pursued under these procedures:

- a. whether there have been other similar complaints about the same Respondent;
- b. whether the Respondent has a history of arrests or disciplinary records from a prior school indicating a history of prior misconduct;
- c. whether the Respondent threatened further sexual misconduct, sexual violence, or other Prohibited Conduct against the reporting party or others;
- d. whether the misconduct was alleged to be committed by multiple individuals;
- e. whether the misconduct was perpetrated with a weapon;
- f. whether the reporting party is a minor;
- g. whether Curry possesses other means to obtain relevant evidence of the sexual misconduct or Prohibited Conduct (e.g., security cameras or personnel, physical evidence); and
- h. 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.

The Title IX Coordinator will make and document this determination, in consultation with legal counsel. Regardless of whether the Complainant chooses to file or participate in a Formal Complaint, the Title IX Coordinator will assist the Complainant with supportive measures, which may include academic, housing, transportation, employment, and other accommodations. (See, Non-Discrimination Policy, Supportive Measures, Section IX.D..)

Supportive measures provided to the Complainant may not unreasonably burden the Respondent. Where no Formal Complaint has been filed and a requested supportive measure impacts the Respondent, the Title IX Coordinator will provide Respondent with written notice of the report, which includes, as known, the date, time, and location of the alleged Prohibited Conduct and the underlying factual allegations, including the identity of the Complainant.

Therefore, certain supportive measures may not be available if the Complainant wishes to maintain anonymity. Where the Complainant declines to participate in an investigation, Curry's ability to meaningfully investigate and respond to a report may be limited.

- B. Where Curry Determines That the Complainant's Request(s) Can Be Honored** Where the Title IX Coordinator determines that Curry can honor the Complainant's request that no Formal Complaint be pursued under these procedures, Curry may nevertheless take other appropriate steps designed to

eliminate the reported Prohibited Conduct, prevent its recurrence, and address its effects on the Complainant and the Curry community.

Those steps may include offering the Complainant reasonable and available accommodations, conducting targeted prevention and awareness training, and/or providing or imposing other supportive measures tailored to the circumstances.

The Complainant may later choose to pursue a Formal Complaint within the time limits for filing a Formal Complaint under these procedures. Upon receipt of new or additional information, the Title IX Coordinator may reconsider the Complainant's request that no Formal Complaint be pursued under these procedures and initiate the resolution process, as explained directly below.

- C. Where Curry Determines That the Complainant's Request(s) Cannot Be Honored
Where the Title IX Coordinator determines that Curry cannot honor the Complainant's request that no Formal Complaint be pursued under these procedures, the Title IX Coordinator will promptly initiate the resolution process under these procedures by making a signed, written Formal Complaint on behalf of Curry.

Where the Title IX Coordinator signs a formal complaint, the Title IX Coordinator is not a Complainant or otherwise a party. The Title IX Coordinator will notify the Complainant that Curry intends to proceed with a Formal Complaint and will take immediate action as necessary to protect and assist the Complainant.

The Title IX Coordinator will make reasonable efforts to protect the privacy of the Complainant. However, typically, the Complainant's identity would have to be disclosed as part of Curry's investigation. The Complainant is not required to participate in any proceedings that follow but will be treated as the Complainant in the process and will receive all required communications and opportunities to participate in the investigation and adjudication.

However, if the Complainant declines to participate in an investigation and/or the adjudicative process under these procedures, Curry's ability to investigate meaningfully and respond to a report of Prohibited Conduct may be limited.

B. Formal Complaints

Curry intends that investigations be completed thoroughly but as promptly as possible. The timeframe for this process begins with the filing of a Formal Complaint.

The process [not including an appeal] will be concluded within a reasonably prompt manner, and no longer than one hundred and twenty (120) business days [includes Mondays-Fridays, excluding official holidays recognized by Curry] after the filing of the Formal Complaint, provided that the process may be extended for a good reason, including but not limited to the absence or illness of a process administrator, such as the investigator or hearing officer, party, a party's advisor, or a witness; concurrent law enforcement activity; or the need for language assistance or accommodation of disabilities.

1. Filing a complaint: All formal complaints under this policy may be made in writing or in person by the reporting party. Complaints may be submitted in the following manner:
 - a. Online
 - b. To the Title IX Coordinator, available from 8:30 a.m. - 4:30 p.m., Monday through Friday, at 617-333-2212. The reporting party should contact Public Safety immediately if facing any immediate threat or danger, particularly if weapons were involved.
2. Filing of formal complaint by Curry: In the absence of a formal complaint, as noted above, Curry reserves the right to initiate a complaint.
3. Notice to Complainant: The person making a complaint under this policy is notified in writing that the complaint has been received, who will be investigating the complaint, and what to expect during the investigation process, including a proposed timeline. The reporting party is also informed of the right to contact law enforcement authorities concerning the complaint.
4. Notice to Respondent: The person accused of misconduct under this policy is notified in writing and in person (if feasible) of the complaint, who will be investigating the complaint, and what to expect during the investigation process, including a proposed timeline. The Respondent is provided with a copy of the written complaint or summary of a complaint that is made orally to the persons identified above.
5. Cross-complaints: Any cross-complaint filed by a Respondent will be addressed in a manner to be determined by the Title IX Coordinator, who shall consider whether the cross-complaint deals with a fact pattern relevant to that alleged by the reporting party and should be considered within the same investigation. The Title IX Coordinator will also consider the timing of the cross-complaint and whether the investigation of the cross-complaint may delay timely resolution of the complaint. Any cross-complaint that is filed in bad faith or is frivolous will be considered retaliation against the reporting party who filed the original complaint, and, in the discretion of the Title IX Coordinator, will be addressed as a separate violation of the Non-Discrimination Policy.

C. Informal Resolution of a Formal Complaint

At any time after a Formal Complaint has been filed and at any time in the investigation and decision-making process, the parties may seek to resolve a report of Prohibited Conduct through Informal Resolution, an administrative process.

Participation in an informal resolution process is entirely voluntary; the Title IX Coordinator will neither pressure nor compel either party to participate in the process or to agree to any specific terms. In every case, the Title IX Coordinator has discretion to determine whether the matter is appropriate for Informal Resolution and to determine the appropriate terms.

However, pursuant to Massachusetts law, mediation or informal resolution, even if voluntary, may not be used to resolve complaints of sexual assault or sexual coercion, including rape and fondling. If the parties agree to participate in an informal resolution process the Title IX Coordinator will:

1. provide to the parties a written notice disclosing

- i. the allegations;
 - ii. the requirements of the informal resolution process, including the circumstances under which it precludes the parties from resuming a formal complaint arising from the same allegations;
 - iii. that at any time prior to agreeing to a resolution, any party has the right to withdraw from the informal resolution process and resume the investigation process with respect to the formal complaint; and
 - jjj. any consequences resulting from participating in the informal resolution process, including the records that will be maintained or could be shared;
2. obtain the parties' voluntary, written consent to the informal resolution process; and the following additional conditions apply to this process:
 1. Informal resolution will not include face-to-face meetings between the Complainant and the Respondent.
 2. The parties are strongly encouraged, although not required, to consult with their advisor and any support persons during the entire Informal Resolution process.
 3. If the process is terminated for any reason, the matter will be resolved pursuant to the Formal Complaint resolution process under these procedures. For this reason, the investigator will not participate in the informal resolution process.
 4. The Title IX Coordinator will oversee the informal resolution process and will have access to all college and investigation records in the matter, including any records or reports prepared during an investigation.
 5. If both parties are satisfied with the facilitator's recommendation, the matter will be resolved with a written agreement.
 6. The facilitator will prepare an Informal Resolution agreement. Such terms may include but are not limited to implementation of any sanctions or remedies that could be imposed after a finding of responsibility is reached under these proceedings.
 7. The Title IX Coordinator will provide each party, separately, with a copy of the proposed agreement for the party to review, sign, and return.
 8. Once a party has returned the signed agreement to the Title IX Coordinator, the party has two (2) business days to reconsider and withdraw from the agreement by notifying the Title IX Coordinator in person or in writing.
 9. Within the two (2) business days, if either party withdraws from the agreement, the matter would be returned for resolution of the Formal Complaint.
 10. After the two (2) business days, if neither party withdraws, the terms of the agreement will become effective and the Title IX Coordinator will promptly notify both parties in writing that the agreement is final.
 11. Once the agreement is effective, the parties may not appeal the agreement. The parties are expected to honor and comply with the terms of the Informal Resolution agreement. Noncompliance may be subject to proceedings under the Campus Code of Conduct or disciplinary procedures for faculty and staff.
 12. If the process is terminated and the matter resolved pursuant to the Formal Complaint resolution process, neither the Title IX Coordinator nor the parties will disclose to the decision-maker or the Appeal Panel either the fact that the parties had participated in the Informal Resolution process or any information learned during the process.

D. Investigative Procedure

- A. Investigator: All investigations within the scope of the Office of Institutional Equity and Compliance will be conducted by the Assistant Director & Civil

Rights Investigator. This is an individual, hired by Curry, who is trained and experienced in conducting investigations and is trained in Curry's policies and procedures. Depending on case volume, some investigations may be conducted by an external investigator hired by Curry. The Complainant or the Respondent may submit a written request to the Title IX Coordinator to contest the investigator, if there are reasonable articulable grounds to suspect bias, conflict of interest, or an inability to be fair and impartial. This challenge must be raised within four (4) business days of receipt of the notice of investigation. All objections must be raised prior to the commencement of the investigation. The Title IX Coordinator will make the determination whether to seek an alternative external investigator. Curry also reserves the right to appoint a single investigator or two investigators from within or outside the Curry community to conduct the investigation where warranted, as determined in the sole discretion of by the Title IX Coordinator, in consultation with legal counsel.

- B. Investigation:** The Complainant and Respondent shall each be interviewed by the investigator and may have an advisor with them for the meeting. The investigator, in consultation with the Title IX Coordinator, may, in their discretion, tape-record interviews with the consent of the interview subjects. No other individual is permitted to record interviews or other proceedings. Both parties may present documents, the names of witnesses, and suggested specific questions to be posed to the parties or witnesses by the investigator. The Respondent may not be present for the Complainant's interview. Both parties shall have the opportunity to respond to statements made by others. The investigator may also interview other witnesses or consider other evidence as they deem appropriate, subject to the following:
- i. A party's medical or mental health records are confidential under law. If a party voluntarily decides to share such records with the investigator, the relevant portions of the records, redacted to comply with federal and state law, will be shared with the opposing party and included in the investigation report.
 - ii. The investigator shall have the discretion to bar the admission of evidence that is deemed to be more prejudicial than probative.
 - iii. Opinions of expert witnesses are not admissible in the investigation. This includes but is not limited to findings prepared by an individual administering a lie detector test to a party or witness.
 - iv. Prior sexual history of a Complainant: In general, a Complainant's prior sexual history is not relevant to an investigation under this policy and will not be considered by investigators or decision-makers unless such questions and evidence about the Complainant's prior sexual behavior are offered to prove that someone other than the Respondent committed the conduct alleged by the Complainant, or if the questions and evidence concern specific incidents of the Complainant's prior sexual behavior with respect to the Respondent and are offered to prove consent. The mere fact of a current or previous dating or sexual relationship, by itself, is not sufficient to constitute consent, nor does it preclude a finding of responsibility with respect to the Respondent.
 - v. Pattern evidence by a Respondent. Where there is evidence of a pattern or conduct similar in nature by the Respondent, either prior to or subsequent to the conduct in question, regardless of whether there has been a finding

of responsibility, this information may be deemed relevant and probative to the determination of responsibility and/or assigning of a sanction. The determination of relevance will be based on an assessment of whether the previous incident was substantially similar to the present allegation or information and indicates a pattern of behavior and substantial conformity with that pattern by the Respondent.

C. Review of the Final Investigative Record and Draft Report: Upon completion of the investigation, a draft report and investigative record will be made available to the parties to inspect and review in hard copy or electronic format. Curry is not under an obligation to use any specific process or technology to provide the evidence and shall have the sole discretion in terms of determining format and any restrictions or limitations on access if it is accessible. The investigative record shall include:

- i. Written summaries or transcripts (but not audio files) of all interviews by the investigator with the parties and any witnesses
- ii. Copies of any documents, electronic records, and media and photographs or descriptions of physical materials collected during the course of the investigation, except those that are excluded pursuant to Section II.D.2, whether or not the investigator intends to rely on such information in the investigative report and whether or not such evidence is inculpatory or exculpatory

The parties will have ten (10) business days to inspect and review the evidence and draft report and submit a written response by email to the investigator. Parties may request a reasonable extension to this deadline. This response may include:

- i. provision of additional evidence;
- ii. comments about content, including requests for redaction;
- iii. requests for additional meetings with the investigator;
- iv. requests for the investigator to conduct further investigation and/or questioning of additional witnesses; and
- v. any objections to the relevance of certain evidence.

The Title IX Coordinator will provide copies of the parties' written responses, including any additional evidence, to the investigator, and to all parties and their advisors. The investigator will consider the parties' written responses before completing the Investigative Report.

The parties and their advisors must sign an agreement not to disseminate any of the evidence subject to inspection and review or responses, or to use such evidence for any purpose unrelated to the non-Title IX procedure. The parties and their advisors agree not to photograph or otherwise copy the evidence.

The investigator has discretion whether to conduct any additional requested meetings, interviews, or questioning identified in the parties' responses.

- D. Investigator's Report:** In a timely manner, the investigator shall submit a final written report of the investigation to the Title IX Coordinator together with the parties' responses to the draft report, if any. The report shall describe the investigation and all relevant evidence obtained in it, and shall recommend one of the following findings:
- i. The Respondent is responsible for violating this policy;
 - ii. the Respondent is not responsible for violating this policy; or
 - iii. there is insufficient information to determine whether the Respondent is responsible for violating this policy.

The written investigation report will summarize the information gathered, synthesize the areas of agreement and disagreement between the parties and any supporting information or accounts, and analyze the relevant facts determined through the investigation, referencing any supporting documentation or statements. The investigation report may include summaries of interviews with the Complainant, the Respondent, third-party witnesses, and any other individuals with relevant information, credibility assessments of the parties and witnesses, photographs of relevant sites or physical evidence, electronic records, and forensic evidence. The report will provide specific support for the recommended finding based on information obtained during the investigation. The investigator shall arrive at the conclusions based on a preponderance of evidence, meaning whether it is more likely than not that this policy was violated. Sanctions shall not be addressed in the investigator's report.

- E. Response to Investigator's Report:** The parties will have ten (10) business days to inspect and review the evidence and final report, including impact or mitigation statements, and submit a written response to the investigator. Parties may request a reasonable extension to this deadline. Impact statements allow the complainant to describe the physical, emotional, and academic or professional toll of the misconduct, while mitigation statements allow the respondent to present context, rehabilitative efforts, or factors for leniency. These statements are not required. The response and these statements shall be appended to the final report and provided to the appropriate decision-maker.

E. Final Decision on Responsibility and Sanctions

- A. Responsibility:** At the completion of an investigation, the Investigator will consider the parties' responses and determine responsibility.
- B. Sanctions & Determination of Responsibility:** The Investigator will then provide the following individuals their recommendation of responsibility to impose sanctions and decision-making:
 - i. The Provost & Executive Vice President for Academic Affairs (where a faculty member is the respondent)
 - ii. The Assistant Vice President for the Student Experience and Dean of Students (where a student is the respondent)
 - iii. The Vice President for Human Resources (where a non-faculty staff member is the respondent)
- C. Duties of Decision-Maker:** The Decision-Maker may choose, in their discretion, to meet with the parties, individually, or with any witnesses, or the investigator. Within fifteen (15) business days of receipt of the parties response to the final

investigation report, the Investigator will make one of the following determinations about responsibility using the preponderance of the evidence standard:

- i. the Respondent is responsible for violating this policy;
- ii. the Respondent is not responsible for violating this policy; or
- iii. there is insufficient information to determine whether the Respondent is responsible for violating this policy.

If a Respondent is determined to be responsible for violating the policy, the Decision-Maker may impose sanctions.

- D. Written Determination Regarding Responsibility and Sanctions:** The written determination regarding responsibility and sanctions will be issued by the Title IX Coordinator simultaneously to all parties through their institution email account, or other reasonable means as necessary. The determination will include:
- i. Identification of the allegations potentially constituting Prohibited Conduct
 - ii. Findings of fact supporting the determination
 - iii. Conclusions regarding which section of the Policy, if any, the Respondent has or has not violated
 - iv. For each allegation, a statement of, and rationale for, a determination regarding responsibility and any sanctions imposed
 - v. Curry's procedures and the permitted reasons for the Complainant and Respondent to appeal (described below in "Appeal")
5. List of Sanctions. Potential sanctions are identified as appendices in the applicable Policy.

F. Appeal of a Finding of Responsibility and Sanctions

Each party may appeal a final determination of responsibility and imposition of sanctions. To appeal, a party must submit their written appeal within ten (10) business days of being notified of the decision, indicating the grounds for the appeal. The appealing party may request an extension of time by submitting a request to the Title IX Coordinator explaining the reason(s) for the request.

The appellate reviewer will have discretion to grant such a request upon a finding of good cause for the delay. Failure to submit an appeal within the ten (10) business days or any approved extension constitutes waiver of the right to appeal. All appeals will be heard by an Appeals Officer who has been trained in Curry's Policies, non-Title IX Procedures, the scope of Curry's education program or activity, how to conduct an investigation process including appeals, and how to serve impartially, including by avoiding prejudgment of the facts at issue, conflicts of interest, and bias.

The Appeal Officer will be a different individual from the Investigator. The Appeal Officer may be a College employee or someone from outside of Curry chosen at the sole discretion of the Title IX Coordinator (or their designee), who will communicate the name to the parties. All appeals will be based solely upon the investigative record and final Written Determination Regarding Responsibility and Sanctions. When relevant to a stated ground for appeal, the record may be supplemented on appeal with evidentiary materials excluded or redacted from the investigative record or newly discovered evidence. Appeals may be brought only upon one or more of the following grounds:

1. Procedural irregularity that affected the outcome of the matter
2. New evidence that was not reasonably available at the time the determination regarding responsibility was made, which could affect the outcome of the matter
3. Sanctions were disproportionate for the violation found.

The appealing party commences an appeal by submitting a written statement to the Title IX Coordinator. The appeal statement must set forth:

1. the determination(s) being appealed;
2. the specific ground(s) for the appeal; and
3. the facts supporting the grounds.

A copy of the appeal statement will be provided to the other party, who within ten (10) business days may submit a written response to the Title IX Coordinator. The response should address both the specific ground(s) for appeal set forth in the appealing party's statement and the specific facts asserted by the appealing party.

The appellate decision-maker will establish a reasonable schedule for issuing a written decision, typically no later than fifteen (15) business days after receipt of any responses to the appeal. With the exception of faculty covered by the Agreement between Curry and the AAUP, the decision will be final and binding on all parties.

Any decision will be based solely upon the investigative record, the final Written Determination, and, in appropriate cases, a showing of new evidence relevant to the ground for appeal. The decision shall include the rationale for the decision.

The Appellate Reviewer may affirm the decision of the decision-maker or sustain any of the above-specified grounds for appeal, in which case the Appellate Reviewer may:

1. reverse or modify a finding of responsibility and/or actions;
2. remand a case to the investigator or decision maker for clarification or reconsideration consistent with the appeal decision, if doing so would assist with a timely, practicable, and efficient resolution of the case; or
3. remand a case for a new or additional investigation, to either the original investigator or to a new investigator. The final written determination of the appeal will be issued simultaneously to all parties through their college email account, or other reasonable means as necessary.

G. Withholding Degrees

At the discretion of the Provost and Executive Vice President for Academic Affairs, or their designee, a student may not register for classes, participate in room draw, participate in Commencement, or receive a degree if they have not completed or complied with sanctions imposed under this process, or if an investigation is in process. Curry may withhold awarding a degree otherwise earned until the completion of these procedures, including the completion of any sanctions imposed.

H. Enforcement of Sanctions

The Title IX Coordinator will be responsible for ensuring that any sanctions imposed are implemented and completed. This may require contacting college employees in a position

to enforce or monitor sanctions, such as members of Public Safety, the Director of Residence Life & Housing, or an employment supervisor. In contacting such persons, the Title IX Coordinator will only disclose as much information as is necessary to ensure that the sanctions are enforced or monitored.

I. Implementation of Remedies

The Title IX Coordinator will be responsible for implementing any remedies they deem necessary and will take into consideration the Impact or Mitigation Statements submitted by the parties in doing so. Remedies may include the extension of supportive measures previously put in place and shall be designed to provide equal access to the Complainant to Curry's programs and activities. A decision to impose remedies is not appealable by either party. The Respondent shall be notified of the implementation of any remedies that affects the Respondent. The implementation of remedies is not subject to appeal and is final.

Anti-Hazing Policy

(effective date September 30th, 2026)

I. PURPOSE

Curry College (“Curry”) is committed to maintaining a safe and respectful educational environment free from hazing. Hazing is incompatible with the values of our community and our educational mission and is strictly prohibited at Curry, as a matter of policy and in accordance with applicable law.

II. SCOPE

This policy applies to all Curry students, student organizations and teams (whether or not recognized by Curry), faculty, staff, coaches, volunteers, and others acting on Curry’s behalf. It applies to conduct on or off campus, including online conduct, that has a connection to Curry or its programs. Students and student organizations are subject to the Code of Student Conduct in the Student Handbook. Staff are subject to the Employee Handbook and faculty are subject to the Collective Bargaining Agreement between the American Association of University Professors and the College and applicable procedures.

III. DEFINITIONS

Student Code of Conduct

Curry's Code of Conduct defines any conduct or method of initiation and/or membership to any student organization or athletic team which willfully or recklessly endangers the physical or mental health of any student or other person. Prohibited conduct may include, but is not limited to, the following:

- Behaviors that emphasize a power imbalance between members of the group or team. This form of hazing typically involves activities or attitudes that breach reasonable standards of mutual respect and place members on the receiving end of ridicule, embarrassment, and/or humiliation tactics.
- Behaviors that cause emotional anguish or physical discomfort, or behaviors that have the potential to cause physical and/or emotional, or psychological harm to feel like a part of the group/team/organization. This form of hazing confuses, frustrates, and causes undue stress and risk of physical and emotional harm for members.

Stop Campus Hazing Act

Under the federal law known as the Stop Campus Hazing Act (the “SCHA”), hazing means: any intentional, knowing, or reckless act committed by a person (whether individually or in concert with other persons) against another person or persons regardless of the willingness of such other person or persons to participate, that (a) is committed in the course of an initiation into, an affiliation with, or the maintenance of membership in, a student organization; and (b) causes or creates a risk, above the reasonable risk encountered in the course of participation in the institution of higher

education or the organization (such as the physical preparation necessary for participation in an athletic team), of physical or psychological injury including —

1. whipping, beating, striking, electronic shocking, placing of a harmful substance on someone's body, or similar activity;
2. causing, coercing, or otherwise inducing sleep deprivation, exposure to the elements, confinement in a small space, extreme calisthenics, or other similar activity;
3. causing, coercing, or otherwise inducing another person to consume food, liquid, alcohol, drugs, or other substances;
4. causing, coercing, or otherwise inducing another person to perform sexual acts;
5. any activity that places another person in reasonable fear of bodily harm through the use of threatening words or conduct;
6. any activity against another person that includes a criminal violation of local, State, Tribal, or Federal law; and
7. any activity that induces, causes, or requires another person to perform a duty or task that involves a criminal violation of local, State, Tribal, or Federal law.

Under the SCHA, the term “student organizations” means an organization at an institution of higher education (such as a club, society, association, varsity or junior varsity athletic team, club sports team, fraternity, sorority, band, or student government) in which two or more of the members are students enrolled at the institution of higher education, whether or not the organization is established or recognized by the institution.

Massachusetts Anti-Hazing Law

Massachusetts General Laws, Chapter 269, sections 17, 18 and 19 state as follows:

Section 17. Hazing; organizing or participating; hazing defined. Whoever is a principal organizer or participant in the crime of hazing, as defined herein, shall be punished by a fine of not more than three thousand dollars or by imprisonment in a house of correction for not more than one year, or both such fine and imprisonment.

The term “hazing” as used in this section and in sections eighteen and nineteen (reproduced below), shall mean any conduct or method of initiation into any student organization, whether on public or private property, which wilfully or recklessly endangers the physical or mental health of any student or other person. Such conduct shall include whipping, beating, branding, forced calisthenics, exposure to the weather, forced consumption of any food, liquor, beverage, drug or other substance, or any other brutal treatment or forced physical activity which is likely to adversely affect the physical health or safety of any such student or other person, or which subjects such student or other person to extreme mental stress, including extended deprivation of sleep or rest or extended isolation.

Notwithstanding any other provisions of this section to the contrary, consent shall not be available as a defense to any prosecution under this action.

Section 18. Failure to report hazing. Whoever knows that another person is the victim of hazing as defined in section seventeen (above) and is at the scene of such crime shall, to the extent that such person can do so without danger or peril to himself or others, report such crime to an appropriate law enforcement official as soon as reasonably practicable. Whoever fails to report such crime shall be punished by a fine of not more than one thousand dollars.

Section 19. Copy of Secs. 17 to 19; issuance to students and student groups, teams and organizations; report Each institution of secondary education and each public and private institution of post-secondary education shall issue to every student group, student team, or student organization which is part of such institution or is recognized by the institution or permitted by the institution to use its name or facilities or is known by the institution to exist as an unaffiliated student group, student team or student organization, a copy of this section and sections seventeen and eighteen (above); provided, however, that an institution's compliance with this section's requirements that an institution issue copies of this section and sections seventeen and eighteen to unaffiliated student groups, teams or organizations shall not constitute evidence of the institution's recognition or endorsement of said unaffiliated student groups, teams or organizations.

Each group, team or organization shall distribute a copy of this section and sections seventeen and eighteen to each of its members, plebes, pledges or applicants for membership. It shall be the duty of each such group, team or organization, acting through its designated officer, to deliver annually to the institution an attested acknowledgment stating that such group, team, or organization has received a copy of this section and said sections seventeen and eighteen, that each of its members, plebes, pledges, or applicants has received a copy of sections seventeen and eighteen, and that such group, team, or organization understands and agrees to comply with the provision of this section and sections seventeen and eighteen.

Each institution of secondary education and each public or private institution of post-secondary education shall, at least annually, before or at the start of enrollment, deliver to each person who enrolls as a full-time student in such institution a copy of this section and sections seventeen and eighteen.

Each institution of secondary education and each public or private institution of post-secondary education shall file, at least annually, a report with the board of higher education and in the case of secondary institutions, the board of education, certifying that such institution has complied with its responsibility to inform student groups, teams or organizations and to notify each full-time student enrolled by it of the provisions of this section and sections seventeen and eighteen, and also certifying that said institution has adopted a disciplinary policy with regard to the organizers and participants of hazing, and that such policy has been set forth with appropriate emphasis in the student handbook or similar means of communicating the institution's policies to its students. The board of higher education and, in the case of secondary institutions, the board of education, shall promulgate regulations governing the content and frequency of such reports, and shall forthwith report to the attorney general any such institution which fails to make such report.

IV. REPORTING & INVESTIGATION PROCEDURES

Reporting

Anyone may report hazing to any of the following: the Office of Community Standards & Accountability (communitystandards@curry.edu, 617-391-5216); the Department of Public Safety (pubsaf@curry.edu, 617-333-2222); Residence Life & Housing (reslife@curry.edu, 617-333-2252); the Office of the Vice President of Student Affairs (617-333-2289); or anonymous reporting(617-333-2221). In an emergency, call 617-333-2222 or 911.

Employees designated as Campus Security Authorities must promptly forward any hazing report to the Department of Public Safety for Clery Act purposes, in addition to any other required referral.

Under M.G.L. c. 269, § 18, anyone at the scene who knows another person is the victim of hazing must report it to the Department of Public Safety as soon as reasonably practicable, if they can do so safely.

Investigation and Resolution

Reports involving students or student organizations are reviewed, investigated, and resolved by the Office of Community Standards & Accountability under the Code of Student Conduct. Organizations may be held responsible as described in the Student Handbook.

Reports involving staff are resolved by the Office of Human Resources and reports involving faculty are handled in compliance with the CBA.

Reported hazing that involves sexual acts or conduct based on a protected characteristic is also referred to the Office of Institutional Equity and Compliance for assessment under the Sexual Misconduct or Non-Discrimination Policy.

Conduct may violate Curry policy even if it would not constitute a crime or violate federal or state law.

V. RETALIATION

Curry prohibits retaliation against anyone who reports hazing in good faith or participates in an investigation. Retaliation is a separate violation subject to discipline.

VI. LAW ENFORCEMENT AND PUBLIC DISCLOSURE

When reported conduct may constitute a crime, including hazing under M.G.L. c. 269, § 17, the Department of Public Safety will coordinate with the Milton Police Department, consistent with FERPA and applicable law. Curry issues timely warnings and emergency notifications under the Clery Act when the criteria for those notices are met. Curry discloses hazing statistics in its Annual Security Report and discloses findings against student organizations in its Campus Hazing Transparency Report.

VII. CAMPUS HAZING TRANSPARENCY REPORT

Curry maintains a [Campus Hazing Transparency Report](#), which is updated at least twice each year. For each finding that a student organization violated Curry's hazing policy, the report lists: the organization's name; a general description of the violation, including whether it involved alcohol or drugs; the findings and sanctions; and the dates of the incident, the start and end of the investigation, and notice to the organization. The report contains no personally identifiable information and links to this policy, the Annual Security Report, and Massachusetts hazing law. Each entry is kept for five years. The Department of Public Safety maintains the report.

VIII. HAZING PREVENTION AND AWARENESS PROGRAMS

Curry maintains a research-informed, campus-wide hazing prevention program for students, faculty, and staff. The program includes information about hazing and Curry's hazing policies and reporting options; primary prevention strategies; bystander intervention skills; ethical leadership; and ways to build group cohesion without hazing.

For more information on these programs, please contact the [Office of Institutional Equity and Compliance](#).

Curry College Milton Campus

2023-2025 Calendar Year Crime Statistical Summary

Clery Reportable Primary Crimes, Sex Offenses, and VAWA Offenses

Location	On-Campus			Residence Hall			Non-Campus			Public Property		
<u>Primary Crimes</u>	2025	2024	2023	2025	2024	2023	2025	2024	2023	2025	2024	2023
Aggravated Assault	1	1	1	1	1	0	0	0	0	0	0	0
Arson	0	0	0	0	0	0	0	0	0	0	0	0
Burglary	0	1	4	0	1	4	0	0	0	0	0	0
Motor Vehicle Theft	0	0	0	0	0	0	0	0	0	0	0	0
Murder & Non-Negligent Manslaughter	0	0	0	0	0	0	0	0	0	0	0	0
Non-Negligent Manslaughter	0	0	0	0	0	0	0	0	0	0	0	0
Robbery	0	0	0	0	0	0	0	0	0	0	0	0
<u>Sex Offenses & VAWA Offenses</u>												
Sex Offense: Fondling	0	3	3	0	1	3	0	0	0	0	0	0
Sex Offense: Incest	0	0	0	0	0	0	0	0	0	0	0	0
Sex Offense: Statutory Rape	0	0	0	0	0	0	0	0	0	0	0	0
Sex Offense: Rape	0	4	2	3	3	2	0	0	1	0	0	0
VAWA Offense: Dating Violence	0	0	6	0	0	6	0	0	0	0	0	0
VAWA Offense: Domestic Violence	1	0	0	1	0	0	0	0	0	0	0	0
VAWA Offense: Stalking	1	0	0	1	0	0	0	0	0	0	0	0

*Residence Hall numbers are a subset of On-Campus numbers

Curry College Milton Campus

2023-2025 Calendar Year Crime Statistical Summary

Clery Reportable Hate Crimes

Location	On-Campus			Residence Hall			Non-Campus			Public Property		
<u>Hate Crimes</u>	2025	2024	2023	2025	2024	2023	2025	2024	2023	2025	2024	2023
Aggravated Assault	0	0	0	0	0	0	0	0	0	0	0	0
Arson	0	0	0	0	0	0	0	0	0	0	0	0
Burglary	0	0	0	0	0	0	0	0	0	0	0	0
Larceny-Theft	0	0	0	0	0	0	0	0	0	0	0	0
Intimidation	1	1	0	1	0	0	0	0	0	0	0	0
Motor Vehicle Theft	0	0	0	0	0	0	0	0	0	0	0	0
Murder/Non-Negligent Manslaughter	0	0	0	0	0	0	0	0	0	0	0	0
Robbery	0	0	0	0	0	0	0	0	0	0	0	0
Vandalism/Destruction of Property	0	0	0	0	0	0	0	0	0	0	0	0
<u>Based On</u>												
Disability	0	0	0	0	0	0	0	0	0	0	0	0
Ethnicity	0	0	0	0	0	0	0	0	0	0	0	0
Gender	0	0	0	0	0	0	0	0	0	0	0	0
Gender Identity	0	0	0	0	0	0	0	0	0	0	0	0
National Origin	0	0	0	0	0	0	0	0	0	0	0	0
Race	1	0	0	0	0	0	0	0	0	0	0	0
Religion	0	0	0	0	0	0	0	0	0	0	0	0
Sexual Orientation	0	0	0	0	0	0	0	0	0	0	0	0

*Residence Hall numbers are a subset of On-Campus numbers

Curry College Milton Campus

2023-2025 Calendar Year Crime Statistical Summary

Judicial Referrals for Drug, Alcohol, and Weapon Violations

The following is a summary of judicial referrals for drug, alcohol and weapons violations committed by students for the last three years. These totals represent incidents adjudicated either by the Office Residence Life and Housing or by the Office of Community Standards and Accountability:

Location	On-Campus			Residence Hall			Non-Campus			Public Property		
<u>Offense</u>	2025	2024	2023	2025	2024	2023	2025	2024	2023	2025	2024	2023
Drug Law Violation	6	10	11	6	10	11	0	0	0	0	0	0
Liquor Law Violation	15	5	4	15	5	4	0	0	0	0	0	0
Weapons Violation	1	6	2	1	6	2	0	0	0	0	0	0

*Residence Hall numbers are a subset of On-Campus numbers

Curry College Milton Campus

2023-2025 Calendar Year Crime Statistical Summary

Arrests for Drug, Alcohol, and Weapon Violations

Location	On-Campus			Residence Hall			Non-Campus			Public Property		
<u>Offense</u>	2025	2024	2023	2025	2024	2023	2025	2024	2023	2025	2024	2023
Drug Law Violation Arrest	0	0	0	0	0	0	0	0	0	0	0	0
Liquor Law Violation Arrest	0	0	0	0	0	0	0	0	0	0	0	0
Weapons Violation Arrest	0	0	0	0	0	1	0	0	0	0	0	0

*Residence Hall numbers are a subset of On-Campus numbers

Curry College Milton Campus 2023-2025 Calendar Year Crime Statistical Summary Stop Campus Hazing Act

In accordance with the Stop Campus Hazing Act, Curry College Department of Public Safety will publish crime statistics on an annual basis that fall under the category and classification of Hazing.

Location	On-Campus			Residence Hall			Non-Campus			Public Property		
<u>Offense</u>	2025	2024	2023	2025	2024	2023	2025	2024	2023	2025	2024	2023
Hazing	0	n/a	n/a	0	n/a	n/a	0	n/a	n/a	0	n/a	n/a

Curry College

Extended Programs & Educational Outreach Locations

Per the Clery Act, Curry College is required to disclose crime statistics of “Non-Campus” locations. The Clery Act defines non-Campus locations as:

“Any building or property owned or controlled by a student organization that is officially recognized by the institution; or any building or property owned or controlled by an institution that is used in direct support of, or in relation to, the institution’s educational purposes, is frequently used by students, and is not within the same reasonably contiguous geographic area of the institution.”

As such, Curry College is required to include information and statistics from these locations in its Annual Security Report. Crime statistics for these sites are included in the Milton campus “non-Campus” statistics.

Canton Police Department Phone: (781) 821-5090 Emergency 911	Massachusetts State Police (Troop H-7) Phone: (617) 698-5840 Emergency 911	CCDPS (Only during an official College Event*) Phone: (617) 333-2232 Emergency (617) 333-2222
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Canton Ice House

Location

The Canton Ice House is located at 65 North Street, Canton, MA. This ice rink is utilized by the College for its male hockey team practices and games throughout the hockey season. The ice rink is owned by Canton Ice House, LLC. In addition to being the home rink for Curry College it is also open to the public.

Police Authority and Jurisdiction

The Town of Canton Police Department is the primary law enforcement agency that serves this location.

The Town of Canton Police Department
1492 Washington Street, Canton, MA
(781) 821-5090

Reporting a Crime or Incident

The primary method to report crimes or incidents at the Canton Ice House is to dial 911 or contact Canton Police at (781) 821-5090.

**Note: In the case of an emergency, Curry College Public Safety should only be contacted during an officially recognized NCAA Division III or Curry College sponsored sporting events. During other times, the preferred method of contact is by dialing 911.*

Emergency Notifications and Evacuation/Shelter-in-Place

In the event of an Emergency, notifications for this facility will be posted on the [Colleges Athletics website](#). In the event of an emergency that requires an evacuation or sheltering in place, all person's present will receive instructions from first responders via the ice rink's announcement system and through face-to-face communications.

Accessibility and Security

The Canton Ice House is a private facility and open to the public during special events. For more information contact Officer Manager Lisa Repucci at (781) 613-8901

Curry College Plymouth Campus

Curry College ceased operations of this satellite location in late 2025

Location

Curry College's Plymouth Campus is located at 36 Cordage Park Suite #200 in the Town of Plymouth MA, 02360. The building is owned by Cordage Commerce Center, J.D. Cordage, 10 Cordage Park Circle, Suite 235, Plymouth, Ma., 02360 and is leased to the College. The building is shared with other tenants. The Plymouth Campus serves Continuing Education students and offers several degrees in both Undergraduate and Graduate courses.

Policy

As part of Curry College's Annual Security Report, the Curry College Department of Public Safety includes statistics and other information for the Plymouth Campus to comply with the Clery Act. On an annual basis, the Curry College Department of Public Safety requests crime statistics from the local law enforcement agency that has jurisdiction over the Plymouth Campus. The crime statistics provided to CCDPS are documented in this Annual Safety Report.

Police Authority and Jurisdiction

The Curry College Department of Public Safety does not provide regular services to the Plymouth Campus. The Town of Plymouth Police Department is the primary law enforcement agency that responds to calls for service at the Plymouth Campus and is available 24 hours a day, 365 days a year. Students, staff, and faculty that have questions concerning crime and safety at this location should contact the:

[Plymouth Police Department](#)

20 Long Pond Rd. Plymouth MA, 02360
(508) 830-4218

Reporting a Crime or Incident

Any crimes or emergencies that require Police\Fire\EMS shall be reported by dialing 911.

Emergency Notifications and Timely Warnings

Curry College's Plymouth Campus maintains communications with local and state public safety agencies. The Director of Continuing Education for the Plymouth campus in conjunction with local and state authorities shall, as appropriate, provide any Timely Warning or Emergency Alert information to staff, faculty and students via phone, text, and email.

Evacuations/Shelter-in-Place

In case of any emergency individuals may have to evacuate or shelter in place. The decision to evacuate or shelter in place at the Plymouth Campus will fall under the direction of local police and fire agencies. These agencies will contact the facility on site and provide instructions.

Accessibility and Security

Access to the Plymouth Campus is during normal business hours and when classes are scheduled for evenings and weekends. The facility is locked when there are no classes or activities taking place. Hours of operation are as follows: Monday - Thursday 9:00 a.m. - 7:30 p.m., Friday 9:00 a.m. - 5:00 p.m., and Saturdays may vary. The section of the building that houses Curry College is secured by key access and students must always have their College Identification on them and be prepared to show it to staff upon request.

Curry College Plymouth Campus
2023-2025 Calendar Year Crime Statistical Summary
Clery Reportable Primary Crimes, Sex Offenses, VAWA Offenses

Location	On-Campus				Public Property		
<u>Primary Crimes</u>	2025	2024	2023		2025	2024	2023
Aggravated Assault	0	0	0		0	0	0
Arson	0	0	0		0	0	0
Burglary	0	0	0		0	0	0
Motor Vehicle Theft	0	0	0		0	0	0
Murder/Non-Negligent Manslaughter	0	0	0		0	0	0
Non-Negligent Manslaughter	0	0	0		0	0	0
Robbery	0	0	0		0	0	0
<u>Sex Offenses & VAWA Offenses</u>							
Sex Offense: Fondling	0	0	0		0	0	0
Sex Offense: Incest	0	0	0		0	0	0
Sex Offense: Statutory Rape	0	0	0		0	0	0
Sex Offense: Rape	0	0	0		0	0	0
VAWA Offense: Dating Violence	0	0	0		0	0	0
VAWA Offense: Domestic Violence	0	0	0		0	0	0
VAWA Offense: Stalking	0	0	0		0	0	0

Curry College Plymouth Campus
2023-2025 Calendar Year Crime Statistical Summary
Clery Reportable Hate Crimes

Location	On-Campus				Public Property		
<u>Hate Crimes</u>	2025	2024	2023		2025	2024	2023
Aggravated Assault	0	0	0		0	0	0
Arson	0	0	0		0	0	0
Burglary	0	0	0		0	0	0
Larceny-Theft	0	0	0		0	0	0
Intimidation	0	0	0		0	0	0
Motor Vehicle Theft	0	0	0		0	0	0
Murder/Non-Negligent Manslaughter	0	0	0		0	0	0
Robbery	0	0	0		0	0	0
Vandalism/Destruction of Property	0	0	0		0	0	0
<u>Based On:</u>							
Disability	0	0	0		0	0	0
Ethnicity	0	0	0		0	0	0
Gender	0	0	0		0	0	0
Gender Identity	0	0	0		0	0	0
National Origin	0	0	0		0	0	0
Race	0	0	0		0	0	0
Religion	0	0	0		0	0	0
Sexual Orientation	0	0	0		0	0	0

Curry College Plymouth Campus
2023-2025 Calendar Year Crime Statistical Summary
Judicial Referrals for Drug, Alcohol, and Weapon Violations

The Plymouth campus does not have any residential buildings nor does the college have an Office of Community Standards and Accountability at this location. All Drug, Alcohol, and Weapons Arrests are reported by the Plymouth Police Department and included in the table below.

Location	On-Campus			Public Property		
<u>Offense</u>	2025	2024	2023	2025	2024	2023
Drug Law Violation	0	0	0	0	0	0
Liquor Law Violation	0	0	0	0	0	0
Weapons Violation	0	0	0	0	0	0

Curry College Plymouth Campus
2023-2025 Calendar Year Crime Statistical Summary
Arrests for Drug, Alcohol, and Weapon Violations

The Plymouth campus does not have any residential buildings nor does the college have an Office of Community Standards and Accountability at this location. All Drug, Alcohol, and Weapons Arrests are reported by the Plymouth Police Department and included in the table below.

Location	On-Campus			Public Property		
<u>Offense</u>	2025	2024	2023	2025	2024	2023
Drug Law Violation Arrest	0	0	0	0	0	0
Liquor Law Violation Arrest	0	0	0	0	0	0
Weapons Violation Arrest	0	0	0	0	0	0

Curry College Plymouth Campus
2023-2025 Calendar Year Crime Statistical Summary
Stop Campus Hazing Act

In accordance with the Stop Campus Hazing Act, Curry College Department of Public Safety will publish crime statistics on an annual basis that fall under the category and classification of Hazing.

Location	On-Campus			Public Property		
<u>Offense</u>	2025	2024	2023	2025	2024	2023
Hazing	0	n/a	n/a	0	n/a	n/a

Appendix

ACADEMIC

1. Academic and Performance Center
(*Chair R. and Professor A. Crabbe Auditorium • Disability Services • Speaking Center*)
2. Gertrude M. Webb Learning Center (DAL)
3. Hulse Academic Building
(*Black Communications Center • Parent Lounge*)
4. Kennedy Academic Building
5. Levin Memorial Library, Academic Enrichment Center
6. Nioune Building

ATHLETIC

7. Baseball Courts
8. D. Forbes Will Athletic Complex
(*Walker M. Katz Athletic Field • Jack & Kelly Harshbarger Diamond • Softball Field*)
9. Miller Field House
10. Tennis Courts

RESIDENCE HALLS & HOUSES

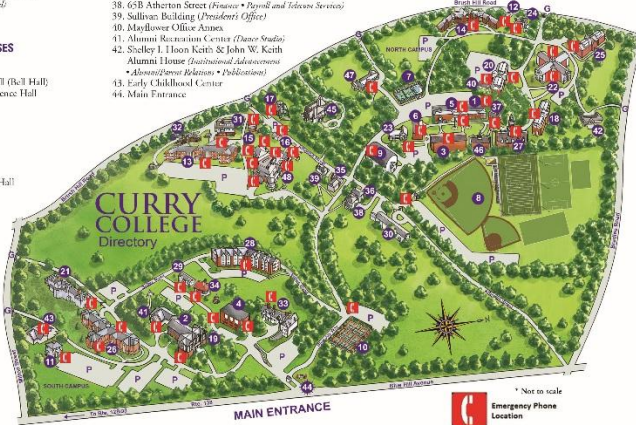
11. 156 House
12. 874 House
13. Alexander Graham Bell Hall (Bell Hall)
14. 886 Brush Hill Road Residence Hall
15. Brown House
16. 1995 House Grey House
17. Green House
18. Lombard Hall
19. Main House
20. Mayflower Hall
21. Millican Hall
22. North Campus Residence Hall
23. North Hall
24. Rose Hall
25. Scholar Hall
26. South Campus Residence Hall
27. State House
28. Suite Residence Hall
29. White House

ADMINISTRATIVE AND STUDENT SERVICES

30. 79 Atherton Street (*Office of the Registrar • Student Financial Services • Technology Center*)
31. 1000 Bruns Hill Road (*Admission Office*)
32. 1016 Bruns Hill Road (*Dean of Students, Residence Life & Housing, Student Affairs, Student Center, Wilson Center, Counseling Center, Health Services, Spiritual Life, Science House & Wilson Education*)
33. Buildings and Grounds
34. Cottage
35. Douglas A. and Claire R. King Academic Administration Building
(*Student Affairs • Center for Career Development • Continuing Education and Graduate Studies Office • Human Resources • Institutional Planning*)
36. The Faculty Center for Professional Development and Curriculum Innovation
37. Faculty Office Building
38. 618 Atherton Street (*Business • Payroll and Telecom Services*)
39. Sullivan Building (*President's Office*)
40. Mayflower Office Annex
41. Alumni Reception Center (*Guest Studio*)
42. Siedley J. Hoon Keith & John W. Keith Alumni House (*Institutional Advancement • Alumni/Parent Relations • Publications*)
43. Early Childhood Center
44. Main Entrance

45. President's House
46. Radio Station (WMLN)
47. 940 Brush Hill Road (*Public Safety Office*)
48. Student Center (*Academic Advising • Academic Success • Amphitheater • Athletic Locker Room • Athletic Offices • ATM • Bookstore • James P. O'Leary Chapel • Conference Center • Copy & Supply Center • Dining Hall • Fitness Center • Game Room • Kala Gymnasium • Post Office • Student Union South Study Lounge • SAC • Sports Café • Student Activities • Student Center Operations and Campus Life • Student Club Office • Student Lounge*)

- G Good road
P Parking



Campus Emergency Phone Locations

Curry College Resources and Referral Options

Sexual Misconduct,
Dating/Domestic Violence,
& Stalking

curry.edu/sexualassaultprevention

Confidential Emotional Support	Medical Care	Victim Reporting Options	Housing, Academic & Other Accommodations
On-campus: - Counseling Center (617) 333-2182 (8:30-4:30) - Counselor-on-call after hours via Public Safety, (7 days a week) (617) 333-2222 Off-campus: - A New Day Victim advocates 24-hour hotline (508) 588-8255	On-campus: - Health Services (8:30-4:30) (617) 333-2182 - Milton Hospital via Public Safety after hours (617) 333-2222 Off-campus: - Beth Israel Deaconess Medical Center (617) 694-4601	Title IX Coordinators - Rachel King (Coordinator) (617) 979-3516 - Lisa MacDonald (Deputy Coordinator) (617) 393-5240 Director of Student Conduct Melissa DeGrandis (617) 333-2365 Public Safety (617) 333-2222 Milton Police (617) 698-3800	Title IX Coordinators - Rachel King (Coordinator) (617) 979-3516 - Lisa MacDonald (Deputy Coordinator) (617) 393-5240 Office of Residence Life & Housing - Jen Martino, Director (617) 333-3165

Title IX Coordinator: Rachel King • (617) 979-3516 • Rachel.King@curry.edu • 55 Atherton St. Room 121

Confidential Emotional Support	Victim Reporting Options
On-Campus: The Curry College Counseling Center provides a confidential space for students to receive emotional support and information about campus and community resources, including medical support, and to discuss their options, like whether or not to report. Off-Campus: A New Day victim advocates can talk by phone or come to campus. They provide free and confidential counseling and advocacy to individuals impacted by sexual violence and/or relationship violence.	- Title IX Coordinators offer information to students about reporting options on and off-campus and ensure that complaints are addressed appropriately. - Students may choose to report to local police. Public Safety can assist with contacting the local police to pursue a criminal complaint. - The College and criminal processes are separate and victims have the right to participate in one and not the other or both. - Students will not be subject to student conduct charges for being under the influence of alcohol or other drugs at the time of an alleged incident of sexual misconduct.
Medical Care	Housing, Academic & Other Accommodations
On-campus: Health Services provides free and confidential medical services (including STI testing and emergency contraception) and referrals. Off-campus: Beth Israel Deaconess Medical Center is a SANE (Sexual Assault Nurse Examiner)-certified site. SANE-certified nurses are specifically trained to perform exams and collect forensic evidence from sexual assault survivors. You can seek medical care whether or not you report the assault to the police. You may receive free care and do not have to use your insurance.	Title IX Coordinators offer guidance and support regarding academic, housing or transportation needs to address safety concerns or the impact of trauma. Accommodations may include housing changes, class reassignment, no contact orders, extension on an assignment, or others, based on situation. Students can also receive housing assistance through the Office of Residence Life and Housing.

Table 10-2 Confidentiality: © 2016 Boston College and St. John's University

Curry College

2026

Annual Fire Safety Report



Statistics for Years 2023-2025

Annual Fire Safety Report Overview

Curry College publishes this Fire Safety Report as part of its Annual Security Report, which contains information with respect to the fire safety practices and standards for Curry College. This report includes information about fire safety and systems in place at Curry. The report also includes the applicable statistical information including the number of fires, the cause of each fire, the number of injuries and deaths related to a fire and the value of the property damage caused by a fire.

Numbers for Reporting Fires

CCDPS Emergency Line (617) 333-2222

or

9-1-1

When a Suspected Fire Occurs

When a suspected fire occurs in any building on campus, community members should immediately call CCDPS at (617) 333-2222 and activate a fire alarm pull station (if alarm is not already active). Once the call is received, CCDPS will dispatch officers to the building to investigate. If the building's fire alarm system has been activated, Milton Fire Department will also respond. If any member of the College community finds evidence of a fire that has been extinguished and that person is not sure whether CCDPS has already responded, the community member should immediately notify CCDPS to investigate and document the incident.

In most situations, it will be a fire alarm that will alert the building occupants of a potential hazard. Upon an alarm activation, all occupants are required to evacuate the building immediately using the nearest stairwells and exits in each building. Residents of buildings should become familiar with their building layout and plan multiple evacuation routes in case one route becomes unpassable.

Once individuals have evacuated from the building, they are to remain outside of the building until the fire department or CCDPS makes an "all clear" determination. Failure to evacuate the building during an active fire alarm could lead to disciplinary action.

Fire Safety Information

Curry College buildings are equipped with a variety of safety systems that are designed to detect, stop and or suppress the spread of a fire.

Fire Doors

The first line of defense against the spread of smoke or fire from one area to another is doors. Some doors, such as fire doors in corridors or stairwells of residence halls are designed to withstand a fire longer than those of an individual room door. It is important that fire doors be CLOSED for them to work. Additionally, automatic door closers should not be tampered with or propped open.

Sprinkler System

Sprinklers are 98 percent effective in preventing the spread of fire when operating properly. Do not obstruct the sprinkler heads by hanging clothes from the piping, placing boxes directly under the sprinkler, etc.

Smoke Detectors

Smoke detectors cannot do their job if they are disabled or covered by the occupant. Covering tampering or disabling a smoke detector is a violation of College Policy and state law. Any persons found tampering with fire safety equipment are subject to the Community Standards process and or arrest/prosecution under the law.

Fire Extinguishers

Fire Extinguishers are in every building and may be utilized in the case of a small, isolated fire. It should be noted that not all fire extinguishers are created equal, as there are different fire classifications.

Fire Extinguisher Use

Follow the chart below to combat fires with an extinguisher

Do not put your safety at risk! If a fire is too large or uncontrollable DO NOT attempt to extinguish it. Call for help!

USING A FIRE EXTINGUISHER
 Classification and Operation Guide

Identify the class of fire from the list below. Do not use the fire extinguisher if it is not rated for the class of fire you are fighting.

Fire Class	Type of Fire	Picture Symbol
	COMMON COMBUSTIBLES: Wood, paper, cloth, trash and other ordinary materials	
	FLAMMABLE LIQUIDS: Gasoline, oil, paint and other flammable liquids	
	LIVE ELECTRICAL EQUIPMENT: Fires involve electrical equipment, such as appliances, wiring, circuit breakers and outlets	
	COMBUSTIBLE METALS: Combustible metals and metal alloys	
	COOKING MEDIA: Vegetable oil, animal oils and fats	

OPERATING INSTRUCTIONS



PULL
 Pull out the pin
 Hold the extinguisher upright

1



AIM
 Standing several feet back from the fire,
 aim the nozzle at the base of the fire

2



SQUEEZE
 Squeeze the handle to release
 the agent

3



SWEEP
 Sweep the nozzle from side to
 side aiming at the base of the
 fire until the fire goes out

4

Residence Hall Fire Safety Systems

All Curry College residence halls are installed with integrated automatic fire detection and fire alarm systems, which are monitored 24 hours a day, 365 days a year by the CCDPS. All residence halls are also equipped with integrated sprinkler systems, portable fire extinguishers, and Carbon Monoxide detectors. Every residential student is provided an emergency evacuation map plan that directs occupants to primary and secondary exits.

Fire Safety Education and Training Programs

Residential students (including those with special needs) and residence halls staff receive fire safety training at the beginning of the year. There is also a Fire Safety reference guide on the [CCDPS website](#). This webpage includes information on fire safety and appropriate action to take during a fire alarm or fire emergency. Fire drills / tests are conducted at least annually for all residence halls during the academic year in coordination with the CCDPS and Milton Fire Department

Students receive information about fire safety and evacuation procedures during their “floor meetings” and during other educational sessions that they can participate in throughout the year. Residence Life staff members are trained in these safety measures and procedures as well and act as ongoing resource for the students living in residential facilities.

Procedures Students Should Follow in Case of a Fire in a Residential Facility

Upon discovery of a fire, students and staff are trained to activate the fire alarm and exit the building immediately using the closest safe exit and proceed to the predetermined meeting place for that building. Whenever a fire alarm sounds in any residence hall you are required to evacuate the building immediately. Failure to evacuate is a violation of state law and subjects you to arrest and/or disciplinary action. Once an alarm sounds you should:

1. Open the shades (if applicable)
2. Turn off all room lights (if applicable)
3. Close and lock your door

During a fire alarm, do not use the elevators for fire evacuation. Once outside, all individuals are not to enter the building until the Fire Department or CCDPS makes the “all clear” determination.

Emergency Evacuation Procedures

For your own safety, you MUST evacuate when ordered to do so. This includes activation of an audible or visible fire alarm or verbal orders from emergency response personnel.

What to Do If You Hear the Fire Alarm or are Instructed to Leave the Building:

1. If you hear a fire alarm or are told to evacuate, REMAIN CALM.
2. Grab any essential items that are easily accessible (i.e., keys, wallet, cell phone, etc.).
3. Walk calmly, but quickly towards the nearest exit. Tell others to evacuate as you pass.
4. Keep to the right side of corridors and stairwells as you exit.
5. Use stairways only. Do not use elevators.
6. Follow the instructions of emergency personnel regarding alternate exit routes, should your normal pathway be blocked.
7. Assist those who need help, but do not put yourself at risk attempting to rescue trapped or injured victims. Note the location of trapped and injured victims and notify emergency personnel.
8. Once outside proceed directly to the Designated Meeting Area. (DMA) Stay away from the immediate area near the building you evacuated. Remain in the DMA until attendance is taken and instructions are given.
9. Do not re-enter the building until emergency personnel give the “All Clear” instruction.

What to do if you are in a Burning Building:

- If there is smoke in the room keep low to the floor.
- Before passing through any doors, feel the doorknob. If it is hot, do not open the door. Attempt to exit by other means.
- If you cannot exit, hang something from the window such as a pillowcase or a shirt to attract attention for help.
- If you are trapped in a room and have access to water you may need to wet fabric (a towel, bedding etc.) and use it to block smoke from entering through areas of ventilation (door cracks, ventilation ducts etc.).

Evacuation Guidelines for People with Special Needs and Those Who Assist Them

1. **Only** attempt an emergency evacuation if you have had emergency assistance training or the person is in immediate danger and cannot wait for emergency services personnel.

2. **Always ask** how you can help before attempting any emergency evacuation assistance. Ask how he or she can best be assisted or moved, and whether there are any special considerations or items that need to come with the person.
3. If unable to evacuate, people with special needs are to shelter in place in a designated area of refuge and wait for emergency personnel. The designated areas of refuge are stairwells in most buildings. Be sure to let someone know your location and condition and wait for help.
4. Emergency personnel, after reviewing information provided by the Building Administrator, will determine if it is safe to attempt to evacuate the individual

False Fire Alarm / Arson / Tampering with Fire Safety Equipment / Interfering with Firefighters

Fire protection systems and equipment are located throughout Curry College buildings for your safety. It is against state law and College policy to: falsely activate a fire alarm pull station, wantonly cause a fire, tamper with or misuse fire safety systems, interfere with firefighters, and tamper with or remove fire protection equipment (i.e., smoke sensors, fire extinguishers, etc.). Any person found in violation of the above will be subject to college-based sanctions up to expulsion, fines, and or arrest/persecution under the law.

Policy on Portable Electric Appliances, Smoking, and Open Flames

To minimize the potential for fires in residential halls, Curry College has implemented policies that prohibit the use of the following items in any College owned residence halls:

Portable space heaters, barbecue grills, hibachis, smokers (gas, electric, charcoal), and related accessories, including lighter fluids and lighters and other similar type products for cooking /warming purposes, any open flame device or object including candles, candle warmers, incense and related accessories, hot plates, slow cookers, deep fryers, electric skillets, electric woks, griddles, sandwich makers/grills and other similar type of products, toaster ovens for cooking/warming purposes, flammable combustible liquids for recreational/personal use, fireworks, firecrackers, rockets, flares, sparklers and other related devices, halogen lamps, holiday lights, etc.

Students, employees and visitors are strictly prohibited from smoking tobacco products (including electronic smoking devices) in all College buildings as well as outside of buildings within 25 feet of any entrance, air intake duct and/or window.

Anyone who violates this policy is subject to disciplinary action in accordance with the provisions of the Office of Community Standards and Accountability. Sanctions for violations may include verbal warning, formal reprimand, probation, suspension, or dismissal.

Health and Safety Inspections

Several times a year Residence Life staff conduct Health and Safety (H&S) inspections of resident students' rooms. H&S inspections take place during every recess (Thanksgiving Break, Winter Break, and Spring Break) and random inspections take place throughout the academic year. The H&S inspections are primarily designed to find and eliminate safety violations. Students are required to read and comply with their Housing Agreements as well as the Student Handbook. Both the Housing Agreement and the Student Handbook contain policies regarding rules and regulations for residential buildings. H&S inspections include, but are not limited to, a visual examination of electrical cords and devices, sprinkler heads, smoke detectors, fire extinguishers and other safety systems. H&S inspections are also used to determine sanitary conditions of a room.

Daily Fire Log

A daily fire log is available for review 24 hours a day and can be reviewed upon request at the Public Safety Building on the Milton Campus or by calling (617) 333-2222. The information in the fire log includes the nature, date, time and the value of property damage caused by a fire. This Annual Security Report and Fire Safety Report is available on the [CCDPS website](#):

Curry College Plymouth Campus 2023-2025 Calendar Year Residence Hall Fire Statistics

<u>Residence Hall</u>	# of Fires 2025	# of Fires 2024	# of Fires 2023	Dates of Fire	Nature of Fire	Injuries	Deaths	Damage Cost
156 House	0	0	0	N/A	N/A	N/A	N/A	N/A
874 Brush Hill Rd.	0	0	0	N/A	N/A	N/A	N/A	N/A
886 Brush Hill Rd.	0	0	0	N/A	N/A	N/A	N/A	N/A
Alexander Graham Bell Hall	0	0	0	N/A	N/A	N/A	N/A	N/A
Brown House	0	0	0	N/A	N/A	N/A	N/A	N/A
Grey House	0	0	0	N/A	N/A	N/A	N/A	N/A
Green House	0	0	0	N/A	N/A	N/A	N/A	N/A
Lombard Hall	0	0	0	N/A	N/A	N/A	N/A	N/A
Main House	0	0	0	N/A	N/A	N/A	N/A	N/A
Mayflower Hall	0	0	0					
Milton Hall	0	0	0	N/A	N/A	N/A	N/A	N/A
North Campus Residence Hall	0	0	0	N/A	N/A	N/A	N/A	N/A
North Hall*	0	0	0	N/A	N/A	N/A	N/A	N/A
Rose Hall*	0	0	0	N/A	N/A	N/A	N/A	N/A
Scholars Hall	0	0	0	N/A	N/A	N/A	N/A	N/A
South Campus Residence Hall	0	0	0	N/A	N/A	N/A	N/A	N/A
State House	0	0	0	N/A	N/A	N/A	N/A	N/A
Suites	0	0	0	N/A	N/A	N/A	N/A	N/A
White House	0	0	0	N/A	N/A	N/A	N/A	N/A

As of 2024 North Hall and Rose Hall are no longer residential facilities on campus