



QUINSIGAMOND
Community College

ANNUAL SECURITY REPORT

POLICIES - SERVICES - STATISTICS

2025

Campus Emergency Number: 508.854.4444

Non Emergency Dispatch: 508.854.4221

A WORD ABOUT PUBLIC SAFETY

FROM THE CHIEF OF POLICE

The safety and security of everyone at Quinsigamond Community College requires a dedicated community effort that starts with the QCC Police Department. QCC's Police Department fosters a deep professionalism and sense of trust, to optimally serve the college community. QCC students, faculty, and staff have a strong tradition of working closely with QCC Police. This tradition promotes open communication between campus police officers and the college community, which contributes to a safe campus.

By working collaboratively, we can all keep our college community safe. One of the ways you can help is by promptly reporting any suspicious activity to QCC Police Dispatch. I also encourage you to meet our police officers who serve our community. They are here to assist you in having a positive experience at QCC.

The QCC Police Department offers a variety of training sessions and safety programs throughout the year, and I encourage you to seek out the programs we offer. We have many divisions within the police department such as Patrol, Detectives, Communications, Training, Community Outreach and K-9 that are here to serve your needs 24-hours-a-day, 7-days-a-week.

Finally, please remember, "See Something Say Something."

Sincerely,
Stephen D. DiGiovanni
Chief of Police
Quinsigamond Community College PD

CAMPUS SECURITY ACT - CLERY ACT - PREPARATION POLICY STATEMENT

Quinsigamond Community College faithfully adheres to the Student-Right-to

Know and Campus Security Act which was passed by Congress in 1990.

This law requires all Post-Secondary Colleges to report specific incidents of campus crime which occurred during the prior school year.

Title II of this act was known as the Crime Awareness and Security Act. It requires institutions participating in the student financial aid program under Title IV of the Higher Education Act of 1965 to disclose information about campus safety policies and procedures and to provide statistics concerning certain crimes that occur on campus. It was amended and renamed the Jeanne Clery Act in October 1998. In compliance with the act, the Department of Public Safety publishes and distributes this information by October 1 of each year. The Higher Education Act as amended by the Higher Educational Opportunity Act specifies new campus

safety requirements in regards to hate crime, emergency response and evacuation procedures effective October 1, 2010 and is included in this report.

This Annual Security Report includes statistics for the previous three years concerning certain reported crimes, arrests and disciplinary referrals on all of the campus locations, including certain off-campus buildings owned or controlled by Quinsigamond Community College, and on public property within or immediately adjacent to and accessible from the campus.

All College departments that are identified as mandated reporters, together with local municipal police departments, are surveyed annually by the Chief of Police for reportable crimes. The report also includes institutional policies concerning campus security, such as policies concerning alcohol and drug use, crime prevention, the reporting of crimes, sexual assault, and other matters.

Each year on or about October 1st, an e-mail is sent to both employees and students via "QCC Family" that provides the location of the Clery Website. The report can be accessed and hard copies can be picked up at the Campus Police Office 005A. You can obtain a copy of this report by contacting the Campus Police Office or by accessing the following Web site: www.QCC.edu/clery

This document should be read in conjunction with the Student Handbook.

THE COLLEGE AND CLERY GEOGRAPHY

Quinsigamond Community College is one of twenty-seven colleges and universities in the public higher education system of the Commonwealth of Massachusetts. It was established on February 1, 1963 to provide equality education to meet the diverse needs of the citizens of Central Massachusetts. The College is situated in Worcester, the second largest city in New England, which is also the home of many nationally noted private liberal arts and technical institutions. The city, and region, are major industrial and commercial centers, especially in banking, convention/tourism, health-care, high technology, insurance, and manufacturing. The College has expanded its operations over the years to include many locations in the Worcester County Area as defined below.

MAIN CAMPUS

The main campus of Quinsigamond Community College is located at 670 West Boylston Street, Worcester MA. The campus consists of 7 campus buildings including an Athletic Center, Administrative Building, Children's Building, Quest Classroom and Lab Building, Library, Student Center and Surprenant Classroom Building. The hours of operation are generally 6:00 a.m. to 10:00 p.m. Monday through Friday and 7:00 a.m. to 5:00 p.m. Saturday and Sundays.

The main number is 508.853.2300. (See map at end of report).

BRANCH CAMPUS – SEPARATE CAMPUS

Southbridge Campus: QCC's separate campus is located at Southbridge High School, 132 Torrey Road in Southbridge, MA. The location is leased to Quinsigamond Community College and consists of Classrooms, Computer rooms, labs and the main office on the first floor. For CLERY purposes the Southbridge campus has been considered a separate campus since 2021 and as such crime stats are displayed separately. Southbridge campus has no non campus Clery properties to report. The main Number is 508.853.2300.

(See Map at end of report)

Center for Workforce Development and Continuing Education: Located at 25 Federal street Worcester MA. The location is leased to QCC and consists of one building with Classroom, Lab, and Office space. Parking areas included: 3 Salem Square, 12 Federal Street, 30 Federal Street and 30 Myrtle Street. Hours: Monday to Friday, 8:00 a.m. to 10:00 p.m.

NON CAMPUS BUILDINGS

CLERY Defined Non Campus buildings: 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. The following locations are considered Non-Campus Buildings for the purposes of the Clery Act and crime statistics for these locations are included in the Non-Campus Buildings column in the Main Campus Stats. The Crime Stats for the below locations were attained from Worcester Police Crime Analysis Unit in perspective to its geographical location. The crime stats are reflective of the dates and times of operation hours described below.

Parking areas located at the following: Worcester, MA

12 Federal Street.
30 Federal Street
30 Myrtle Street
3 Salem Square.
570 main Street.

QCC at Great Brook Valley (WHA), 35 Freedom Way, Worcester, MA. 01605
Hours: Monday to Friday, 8:00 a.m. to 9:00 p.m.

QCC at the Senior Center, 128 Providence Street, Worcester, MA. Hours:
Monday to Friday, 6:00 a.m. to 5:00 p.m.

QCC at Burncoat High School, 179 Burncoat Street,
Worcester, MA 01606. General Hours: Monday to Friday,
8:00 a.m. to 4:00 p.m. including Summer I & II.

QCC at WSU Campus, 486 Chandler Street, Worcester MA. WSU hosts several QCC students in Student Housing at Chandler Village, Sheehan Hall or Wasylean Hall. Students are required to subscribe to WSU emergency alerts. The Annual WSU Clery/Fire Report can be found here at:
<https://www.worcester.edu/University-Police-Services>

PUBLIC PROPERTY ASSOCIATED WITH CAMPUS

Public property, under the Clery Act, encompasses streets, thoroughfares, sidewalks, and parking facilities, that is "within campus, or immediately adjacent to and accessible from the campus."

POLICY STATEMENTS

The following policy statements apply to all Quinsigamond Community College campus locations unless otherwise noted or explained otherwise within the policy statement.

HOW TO REPORT CRIMINAL OFFENSES AND OTHER EMERGENCIES POLICY STATEMENT

"See Something Say Something"

Main Campus and Center for Workforce Development and Continuing Education: Quinsigamond Community College 's education and awareness efforts encourage the reporting of ALL crimes and suspicious activity to Campus Police using the emergency line 508.854.4444 or Extension 4444 from any on campus phone. As part of the college's on-going effort to enhance safety and security, emergency phones have been installed throughout the campus. (See list below) These phones offer an additional way for community members to report incidents. The phones are programmed to dial the Campus Emergency number when the button is pushed and have a two-way speaker capacity. From 7:00 a.m. to 11:00 p.m., these calls go directly to the Campus Police Dispatch Center and will indicate the exact location from where a call is being made. The dispatcher will dispatch the appropriate response to the scene. After hours, weekends and holidays the emergency phone will ring directly through to the officers emergency cell phones and officers will respond accordingly. Each classroom is equipped with a standard phone that is capable of dialing the emergency line 4444 or 911.

Southbridge Campus: Quinsigamond Community College 's education and awareness efforts encourage the reporting of **ALL** crimes and suspicious activity to Campus Police Dispatch 508-854-4444 or 911. Southbridge Police are the primary emergency responders to campus. A QCC police officer will be dispatched and respond if necessary.

ENCOURAGING ACCURATE AND PROMPT REPORTING POLICY STATEMENT

It is QCC's policy to protect the rights of all individuals and to safeguard the welfare of everyone in the QCC community. All members of the QCC community are expected to conduct themselves with proper respect

for one another and for each other's property. Each member of the QCC community has the right to be free from acts of violence and threats of violence. Members of the community are expected and required to comply with all city, state, and federal laws. Any member of the community, who is victimized by, observes, or has knowledge of a criminal action (or other emergency) should immediately and accurately report such action or emergency to the QCC Police. Violations of the law can result in charges by the QCC Police or another law enforcement agency and/or a referral to the Dean of Students or Human Resources Office.

QCC Police strongly recommend that community members pre-program their cell phones with the QCC emergency dispatch number 508.854.4444.

When calling for either emergency or non-emergency service, be prepared to:

- Clearly identify yourself
- State where you are calling from
- State briefly the nature of your call
- Stay on the line until the dispatcher requests you to hang up or an officer arrives

CONFIDENTIAL REPORTING PROCESS & EXCLUSIONS

It is the policy of Quinsigamond Community College that all crimes be reported to the QCC Police Department. If you are a victim or witness to a crime on campus you are encouraged to promptly report the incident to QCC Police. Due to the sensitive nature of certain types of crimes, victims of sexual assault may choose to confidentially report the crimes to the following individuals. These reports are included in the annual crime statistics.

- **Dean of Students:** 508.854.4294
- **Assistant Dean of Students:** 508.854.4526
- **Director of Counseling:** 508.854.4479

Police reports are public records under Massachusetts state law, and therefore, the QCC Police Department cannot hold reports of crimes in confidence. All reported crimes will be investigated by QCC Police, local and or state police and prosecuted with the assistance and direction of the Worcester County District Attorney's Office.

ANONYMOUS REPORTING

If you would like to report a crime but do not wish to reveal your identity, the police department offers an anonymous hotline (508.854.7550) that allows you to leave specific information about an incident while ensuring your confidentiality. Cases reported anonymously are disclosed in the annual crime statistics.

TEXT-A-TIP is available to all. It is a useful tool utilized by Campus Police to receive reports of suspicious or criminal activity. Reports can be made from a computer (link is external), android (link is external), or iPhone (link is external) It is also available by texting "QCC" + (space) + your tip to 847411.

Tip 411 is NOT AN EMERGENCY NOTIFICATION SERVICE. All tips are completely ANONYMOUS

STATEMENT OF POLICY FOR ADDRESSING COUNSELORS

As a result of the negotiated rulemaking process which followed the signing into law of the 1998 amendments to 20 U.S.C. Section 1092 (f), clarification was given to those considered to be campus security authorities. Campus "Pastoral Counselors" and Campus "Professional Counselors," when acting as such are not considered to be a campus security authority and are not required to report crimes for inclusion in the annual disclosure of crime statistics. As a matter of policy, the professional counselor at the Quinsigamond Community College are encouraged, if and when they deem it appropriate, to inform persons being counseled of the procedures to report crimes on a voluntary basis for inclusion into the annual crime statistics.

The rulemaking committee defines counselors as:

PASTORAL COUNSELOR

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

PROFESSIONAL COUNSELOR

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.

LOCATION OF EMERGENCY CALL BOX:

All Classrooms on the main campus are equipped with a standard telephone to be used to call 911 or 4444.

ADMINISTRATION BUILDING

- Basement Level Entrance
- 1st floor - by both elevators
- 2nd floor - by both elevators

- 3rd floor - by both elevators
- 4th floor - by 416A, elevator

SURPRENANT BUILDING

- Basement - by elevator
- 1st floor - by elevator
- 2nd floor - by elevator
- 3rd floor - by elevator
- 4th floor - by elevator

AHLFORS BUILDING

- Hallway - main entrance

ATHLETIC CENTER

- Basement level - by Campus Police
- Basement level - women's locker room
- Basement level - men's locker room
- Basement level - room 135G
- Lower level - north wall
- Hallway - east entrance

QuEST BUILDING

- Basement Level - elevator
- 1st Floor Level - elevator
- 2nd Floor Level - elevator
- 3rd Floor Level - elevator

CHILD STUDY CENTER

- First floor - main entrance
- Second Floor – outside classroom

CAMPUS POLICE DEPARTMENT AUTHORITY, REPORTING AND RESPONSIBILITIES POLICY STATEMENT

Quinsigamond College Police Department is located on the basement level of the Administration Bldg. room 005 A on the Main Campus. The department is a full service Police Department providing safety, security, parking and traffic services to the entire campus community throughout the year. Quinsigamond Community College Police Department received state Accreditation from the Massachusetts Police Accreditation Commission. Accreditation is a self-initiated evaluation process by which police departments strive to meet and maintain standards that have been established for the profession, by the profession. These carefully selected standards reflect critical areas of police management, operations, and technical support activities. They cover areas such as policy development,

emergency response planning, training, communications, property and evidence handling, use of force, vehicular pursuit, prisoner transportation and holding facilities. The program not only sets standards for the law enforcement profession, but also for the delivery of police services to the citizens of the commonwealth. The College Police Department is currently staffed by a chief of police, deputy chief of operations, deputy chief of administration, four sergeants, seven campus police officers, one detective, one community resource officer, four institutional security officers and two dispatchers. The primary mission of the department is to provide a safe and secure environment for the College community. The department embraces a professional approach to law enforcement, emphasizing customer service, community policing, and impartial enforcement of all laws, policies and regulations. Quinsigamond Campus Police Officers receive their police authority from Chapter 22C of Massachusetts General Laws, Section 63 and are sworn Special State Police Officers. Officers armed have full arrest powers on ALL land and buildings owned, or used by the institution. Campus police officers are charged with the enforcement of all state and local laws as well as any College regulations and policies on Quinsigamond property. Quinsigamond Campus Police Officers receive basic and in-service training at the Massachusetts State Police Academy and or the Municipal Police Training Committee and are POST certified. They also receive specialized training from various police agencies throughout the state and country. The department works closely with state, city and federal police and fire agencies to assist with the safety of the college community. The Southbridge Campus utilizes one contract security officer from Securitas Inc. to patrol the campus during business hours. This officer has no police authority.

There is a written Memorandum of Understanding between Quinsigamond College Police and the Massachusetts State Police however; jurisdiction is shared with local and State law enforcement. Local Police and the Massachusetts State Police have concurrent jurisdiction on all campuses and upon all properties owned or controlled by the College. Part I Crimes, such as rape, murder, aggravated assault, robbery and arson are reported to the jurisdictional law enforcement authority for that area, and a joint investigative effort between Quinsigamond College Police Department and the Jurisdictional Department and or Massachusetts State Police is conducted to solve these serious felony crimes. The prosecution of all criminal offenses, both felony and misdemeanor, are conducted through the Worcester County District Attorney's Office.

All felonies occurring on campus and any Search Warrants issued or requested are reported to the Massachusetts State Police on a monthly basis.

ACCESS TO ACADEMIC FACILITIES POLICY STATEMENT

During the academic year when the College is open, academic buildings and other facilities are accessible to members of the Quinsigamond community and visitors during the day and evening hours. Access to buildings and facilities after hours and when school

is not in session is in accordance with procedures established by designated administrative staff and faculty responsible for their areas in conjunction with the College Police Department. Access is on an as needed basis only. Quinsigamond Community College does not have on campus housing or residents halls.

MONITORING AND RECORDING CRIMINAL ACTIVITY POLICY STATEMENT

Quinsigamond maintains communication with local law enforcement authorities, in addition to retaining statistical data through a computerized incident reporting system. This system assists Campus Police Officers in their documentation efforts relating to reports of crimes, injuries, emergencies, unusual events and/or suspicious activity. In addition to the internal computerized report system the Quinsigamond Public Safety Department is linked nationwide through the LEAPS/NCIC/CORI Law Enforcement Network. This system allows the department access to criminal activity, motor vehicle history/information and priority communication from one law enforcement agency to another. The Crime Log is available at the Campus Police Office during business hours Monday to Friday 9:00 a.m. to 5:00 p.m. or by request.

MAINTAINING SAFE AND SECURE CAMPUS FACILITIES POLICY STATEMENT

The College Police Department reports to the Vice President of Administrative Services, as does the Facilities Department. Both Departments work closely with one another to ensure that our campus buildings and grounds are safe places to study and work. The Facilities Department inspects campus facilities regularly, keeping in mind the concern for safety and security. If Campus Police Officers discover a broken window, nonfunctional light, etc., they file an electronic work order and that is submitted to the Facilities Department. Students as well as faculty and staff may also call Facilities at ext. 7400 to report any safety or security hazards. For those security concerns that require prompt attention, Facilities is contacted via hand held radios immediately and the situation is handled as expeditiously as possible.

Prevention Initiatives Conducted by Facilities and Campus Police include:

- Locking and alarm systems
- CCTV Cameras
- Fire equipment inspections
- Exterior doors and windows
- Emergency/interior/exterior Lighting
- Educational programs
- Monthly newsletters

- Bulletin board displays
- Card access

SECURITY AWARENESS PROGRAMS FOR STUDENTS AND STAFF POLICY STATEMENT

The College Police Department offers education materials to support its yearly safety efforts. They are prepared and/or disseminated to enhance college communities understanding of safety programs in order to prevent harm both physically and emotionally. Such prevention ultimately reduces violence and builds a community that is closely tied together. The College understands it is necessary for all community members to be increasingly responsible for their own security and assist with the security of others around them.

Examples of educational materials consist of, but will not be limited to:

- Educational pamphlets
- “See Something Say Something” program
- Newsletter and campus newspaper contributions – Monthly
- Educational materials are located at the Quinsigamond Community College Police Department
- Posters are at locations around campus
- Educational programs and/or presentations are provided upon request and encouraged on a regular basis.
- Welcome back reminder e-mails on how to contact Campus Police – Several each semester
- Annual Security report distributed – Yearly
- Crime Alerts posted throughout campus – As occur
- Seminars on campus safety (luncheon) sexual assault safety – Monthly
- Run, Hide, Fight, video presentations All College day and as requested

CRIME PREVENTION PROGRAMS FOR STUDENTS AND EMPLOYEES POLICY STATEMENT

The College encourages **ALL** community members to take advantage of the below described specialized programs designed to inform students and employees about the prevention of crimes.

CAMPUS POLICE WEBSITE

General safety information and safety tips can be found on the Web site at: www.QCC.edu/campus-police

RAPE AGGRESSION DEFENSE (R.A.D.)

The R.A.D. System/Program is a free program designed to teach women about awareness, prevention, risk reduction and avoidance while progressing into the basics of hands-on defense training. The R.A.D. System's objective is to "develop and enhance the options of self-defense." Rape is one of the most rapidly growing crimes in American society and affects all people; no matter what their age, race, or economic status. Each situation is different and as such R.A.D. is dedicated to teaching women defensive concepts and techniques against various types of assaults so that they can make an educated decision about resistance. The course requires a 14 hours commitment from each participant.

QCC Police have two certified instructors. The Course is offered once per semester or by request. Requests can be made by calling Campus Police at 508.854.4221.

radKIDS

The radKIDS program is designed to teach kids about abuse prevention awareness, personal safety, and self-defense. It is an abduction prevention course offered to children ages 5-7. The program is usually offered twice per year for the Children's School and may be scheduled at other times upon request by the calling Campus Police at 508.854.4221.

FATAL VISION PROGRAM

The Fatal Vision program educates college students about the dangers of driving while impaired. The program is presented at least once per year usually at the annual "Spring Fling".

SAFETY ESCORTS

The Campus Police Department provides safety escorts for students and employees upon request during operational hours on the Worcester and Southbridge Campus. The College encourages the use of the "buddy system" for personal safety on and off campus.

SEX OFFENDER REGISTRY BOARD REQUIREMENT

Community Notification Regarding Access to Sex Offender Information In accordance with federal law, the College is required to advise the campus community where information concerning registered sex offenders may be obtained. Accordingly, in order to access public information pertaining to registered sex offenders enrolled or employed at the College, please contact the Commonwealth of Massachusetts' Sex Offender Registry Board,

located at P.O. Box 4547, Salem, MA 01970-4547, 978.740.6400, or

the Worcester Police Department, located at 9-11 Lincoln Square.

If you have any questions regarding access to this type of information, please feel free to contact the College's Chief of Police located in the Campus Police Office room 136AC Athletic Center.

NOTE: Three informational boards have been established on the main campus one at our QCC Southbridge campus and one at our Healthcare and Workforce Development Center. These boards will list those individuals known to the college as being Level III Sex Offenders. They are located in the Administration Building by the Student Cafeteria and the 1st floor of the Surprenant Building, HLC outside the Cafe and the Southbridge main entrance.

HAZING POLICY STATEMENT

Hazing, defined below, is prohibited by Massachusetts law M.G.L. ch. 269, §§17 to 19. Institutions of higher education must provide a copy of the Massachusetts hazing law on an annual basis to every student, student group, student team, and student organization.

Hazing is a violation of the Quinsigamond Community College Student Code of Conduct.

Any person may report alleged hazing by completing the report form at the link below or as otherwise indicated in the Student Code of Conduct.

QCC Student Handbook

I understand that Quinsigamond Community College investigates allegations of hazing according to the processes described in the Student Code of Conduct.

"Hazing" means any conduct or method of initiation into any student organization, whether on public or private property, which willfully 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. M.G.L. ch. 269, §17

**CERTIFICATE OF APPROVAL
BOARD OF HIGHER EDUCATION
FOR MASSACHUSETTS COMMUNITY COLLEGES
POLICY ON AFFIRMATIVE ACTION, EQUAL OPPORTUNITY & DIVERSITY**

The Commonwealth of Massachusetts' Community Colleges' Policy on Affirmative Action, Equal Opportunity & Diversity has been approved for implementation by the Board of Higher Education, effective August 1, 2024.

This Policy shall replace the previous Policy, which was approved by the Board of Higher Education and implemented on August 14, 2020, as amended in August 2021. This Policy shall remain in full force and effect until a successor Policy is approved and implemented. The Community Colleges will continually review this Policy and the Complaint Procedure to ensure compliance with the requirements of federal and state laws and regulations.

Noe Ortega
Commissioner
Department of Higher Education

A. OVERALL POLICY STATEMENT

The Community Colleges have carefully developed and outlined the major elements of an effective Affirmative Action, Equal Opportunity & Diversity Policy with the understanding that a successful policy requires more than the knowledge of laws, regulations and current government requirements. It demands leadership, vision, and commitment to fully comprehend what challenges Community Colleges face in preparing students for the twenty-first century. The Colleges, both collectively and individually, commit themselves to not only the valuing of human dignity, but to the appreciation of the necessity of providing all members of the College Community an experience that equips them to relate to all persons and groups in the increasingly global and diverse world in which we all live and work.

The Community Colleges wish to take a role of leadership in providing an environment where equity and diversity are truly valued beyond verbal commitments and mere tolerance. This leadership role requires that we all share responsibility for making constructive campus-wide changes in response to the principles set forth in this Policy. By turning our collective energies into making affirmative action an integral part of campus life, we continue to fulfill our mission in developing the talents and potential of all members of our College Communities and our society.

B. POLICY STATEMENT ON AFFIRMATIVE ACTION, EQUAL OPPORTUNITY & DIVERSITY

The Board of Higher Education of the Commonwealth of Massachusetts is responsible under Chapter 15A of the General Laws of the Commonwealth of Massachusetts for the overall governance of the public higher education system, which includes the fifteen Community Colleges. The Board of Higher Education and the Boards of Trustees of the Community Colleges maintain and promote a policy of non-discrimination on the basis of race, creed, religion, color, gender, gender identity, sexual orientation, age, disability, genetic information, parental leave, pregnancy, parenting status, military service, national origin, and natural and protective hairstyles (“protected class(s)/classification(s).” Further, this policy prohibits retaliation and incorporates by reference, and where applicable, the requirements of Titles VI and VII of the Civil Rights Act of 1964; Title VI of the Civil Rights Act of 1968; Titles I and II of the Civil Rights Act of 1991; Title IX of the Education Amendments of 1972 and its regulations found at 34 C.F.R. part 106; Equal Pay Act of 1963; Civil Rights Restoration Act of 1988; Sections 503 and 504 of the Rehabilitation Act of 1973; Americans with Disabilities Act of 1990; Section 402 of the Vietnam-era Veterans Readjustment Act of 1974, Uniformed Services Employment and Reemployment Rights Act (USERRA); Age Discrimination Act of 1975; Age Discrimination in Employment Act of 1967, as amended; Family and Medical Leave Act of 1993; The Providing Urgent Maternal Protections (PUMP) for Nursing Mothers Act; Federal Executive Order 11246 of 1965, as amended by Executive Order 11375 of 1967; Federal Executive Order 12900 of 1994; Federal Executive Order 13145 of 2000; Federal Executive Order 13160 of 2000; Federal Executive Order 13166 of 2000; the Genetic Information Nondiscrimination Act of 2008, 42 U.S.C. Sec. 2000ff; the reauthorized Violence Against Women Act, Pub. Law No. 113-4 (2013); the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act; the Higher Education Act of 1965; Massachusetts Civil Rights Act; Massachusetts General Laws Chapters 151B, 151C, and Chapter 149; An Act Relative to Gender Identity, Mass. Acts of 2011, ch. 199; An Act Relative to Transgender Anti-Discrimination, Mass. Acts of 2016, ch. 134; An Act Expanding Protections for Reproductive and Gender Affirming Care, Mass. Acts of 2022, ch. 127; An Act Relative to Sexual Violence on Higher Education Campus, Mass. Acts of 2020 ch. 337, (also known as the 2021 Campus Sexual Assault Law); An Act Prohibiting Discrimination Based on Natural and Protective Hairstyles (Massachusetts CROWN Act), Massachusetts Acts of 2022, c. 117; directives of the BHE, the Boards of Trustees of the Community Colleges, and the Commonwealth of Massachusetts; and other applicable local, state and federal constitutions, statutes, regulations and executive orders, including those establishing other protected classes.

Non-discrimination requires the elimination of all existing discriminatory conditions, whether purposeful or inadvertent. The Community Colleges are continuing to systematically examine all policies and procedures to be sure that they do not, if implemented as stated, operate to the detriment of any person on the basis of a protected classification. The Colleges shall require that the practices of those responsible in matters of employment and education, including all supervisors and faculty, are non-discriminatory. Should the College discover discrimination in treatment or effect in any employment, educational or service decision, action, inaction or practice within the College, all appropriate corrective and/or disciplinary actions shall be taken under the direction of the President of the College subject to any applicable collective bargaining agreement or other policy or procedure of the College.

The Community Colleges are committed to a policy of affirmative action, equal opportunity, equal

education, non-discrimination, and diversity. They are committed to providing a learning, working and living environment – whether in person or in the virtual/online setting - for their students, employees and other members of the College Community, which values the diverse backgrounds of all people. The Colleges are committed to assuring that the “College Experience” is one that challenges, empowers, supports, and prepares its students to live in, work in, and value our increasingly global and diverse world. The Colleges believe that the diversity of socio-economic, racial, ethnic, religious, gender, sexual orientation, age and disability backgrounds of members of the College Community enriches the institutions and their various constituencies. The Colleges will not tolerate behavior based on bigotry, which has the effect of discriminating against any member of their communities.

The Community Colleges provide equal access to educational, co-curricular and employment opportunities at the Colleges for all applicants, students and employees in compliance with all applicable laws, regulations and policies. All benefits, privileges and opportunities offered by the Colleges are available to all students, employees and other persons having dealings with the institutions on a non-discriminatory basis. The Colleges are committed to taking a pro-active affirmative action posture with respect to their recruitment, selection and promotion of students and employees.

The purpose of the affirmative action component of this Policy is to establish a set of programmatic objectives, which shall provide for the recruitment, access and advancement of qualified persons from within the protected classes/classifications recognized under this Policy with respect to employment and enrollment opportunities. The intent of this Policy is to responsibly recognize, and to whatever extent possible, resolve the effects of past societal discrimination and the impact which that discrimination has had, not only on victims of such discrimination, but on the total academic, educational and social system as well. It is not intended and should not be used to discriminate against any applicant, employee, or student because of a protected classification.

In response to that recognition, the Colleges, through their Boards of Trustees and Presidents, fully endorse the plan of action set forth in this Policy and shall oversee and monitor its implementation through the Affirmative Action Officer and other assigned personnel.

The following specific policies are established:

- Equal opportunity and affirmative action shall apply to all segments of the College; full and part-time employment; day and continuing education; the curriculum and offerings of the College.
- Equal opportunity and affirmative action shall be applied to the recruitment process for employment and/or access to education.
- Students will have access to the College, programs of study, activities, and other resources intended to serve them, according to the policies of the individual Colleges.
- Equal employment opportunity and affirmative action will be realized in all personnel employment, including recruitment, application for employment, hiring, benefits, compensation, training, promotion, and termination.

- All policies, procedures, privileges, and conditions of the College will follow and incorporate applicable equal opportunity and affirmative action rules and regulations.

The above stated policies are intended to be applied broadly with the goal of promoting equal opportunity and diversity in Community Colleges. The Community Colleges pledge to apply all policies consistently, fairly, and vigorously. Attempts to subvert or abuse these policies will not be tolerated. Appropriate disciplinary action will be taken in the case of an infraction. Such disciplinary action shall be consistent with the appropriate collective bargaining agreement, if applicable.

All policies are made in compliance with laws and regulations and executive orders promulgated by the federal and state governments and other appropriate agencies and authorities, where applicable.

C. DEFINITIONS

ADA/504 COORDINATOR: A College employee assigned the responsibility for maintaining the College's compliance with the Americans with Disabilities Act and Section 504 of the Rehabilitation Act. Alleged violations of the ADA or Section 504 shall be subject to the Affirmative Action Policy's Complaint Procedure as administered by the Affirmative Action Officer. The ADA/504 Coordinator is Shannon Overcash, Associate Director of Compliance/Title IX Coordinator and can be contacted at sovercash@qcc.mass.edu 508-854-7408.

ADVISOR: A single person chosen by a Complaining or Responding Party, who may but is not required to be an attorney (for union employees this may be a union representative), who may be present in any meeting or proceeding prescribed by this Policy, and who may inspect and review evidence. The advisor's role is strictly limited to providing direct assistance to the party that they advise for the purposes of the complaint process. An advisor is not to impede, disrupt or hinder the procedures listed within this Policy and/or other institutional policies through intimidation or creating an environment that unreasonably interferes with anyone's ability to participate in the complaint process. Any person serving as an Advisor who is conducting themselves in such a manner is subject to removal from their role.

AFFIRMATIVE ACTION OFFICER ("AAO"): A College employee assigned the responsibility of administering the College's Affirmative Action Policy or their designee. The Affirmative Action Officer may also serve as the College's Title IX Coordinator and/or the ADA/504 Coordinator. If the Affirmative Action Officer is the person against whom the complaint is filed, the President shall designate another College official to act as the Affirmative Action Officer for purposes of administering the Affirmative Action Policy. The Affirmative Action Officer is Sara Sims, Executive Director of Human Resources and can be contacted at ssimms@qcc.mass.edu 508-854-2757.

COMPLAINANT or COMPLAINING PARTY: The individual(s) filing the complaint, whether it is a current or former student(s) or employee(s), or current or former applicant for admission or employment, or a person other than a student or employee, who is alleged to have been subjected to conduct that could constitute a violation of the Affirmative Action Policy if they were participating or attempting to participate in the College's education program or activity.

COMPLAINT: A written or verbal complaint alleging a violation of the Affirmative Action Policy.

COMPLAINT PROCESS: The process used to address all Complaints alleging a violation of the Affirmative Action Policy. This may also be referred to as "grievance procedure."

CONSENT: "Consent" must be informed, voluntary, and mutual, and can be withdrawn at any time. There is no consent when there is force, expressed or implied, or when coercion, intimidation, threats, or duress is used. Whether a person has taken advantage of a position of influence over another person may be a factor in determining consent. Silence or absence of resistance does not imply consent. Past consent to sexual activity with another person does not imply ongoing future consent with that person or consent to that same sexual activity with another person.

If a person is mentally or physically incapacitated or impaired so that such person cannot understand the fact, nature, or extent of the sexual situation, there is no consent; this includes impairment or incapacitation due to alcohol or drug consumption that meets this standard, or being asleep or unconscious.

DAY: As used in this policy, shall mean a calendar day.

DECISION-MAKER: An individual who is not the same person as the Affirmative Action Officer, Title IX Coordinator or their designee, chosen by the President to reach a determination regarding responsibility by applying the standard of evidence the College has designated in the College's complaint procedures for use in all Complaints.

EQUAL OPPORTUNITY: A College's effort to ensure that all personnel and academic decisions, programs and policies are formulated and conducted in a manner which will ensure equal access for all people and prevent discrimination. As part of this effort, a College will ensure that employment and academic decisions, programs and policies will be based solely on the individual eligibility, merit or fitness of applicants, employees and students without regard to race, color, creed, religion, national origin, age, disability, sex, marital status, military service, gender identity, genetic information, sexual orientation, natural and protective hairstyles, or political or union affiliation.

EMPLOYEE:

(A) **CONFIDENTIAL EMPLOYEE:** Confidential employee means

1. An employee of the College whose communications are privileged or confidential under Federal or State law. The employee's confidential status, for purposes of this part, is only with respect to information received while the employee is functioning within the scope of their duties to which privilege or confidentiality applies;
 - a) Confidential Employees include:
 - i. licensed mental health counselors;
 - ii. licensed health care personnel;
 - iii. Confidential Resource Providers; and
 - iv. other employees as designated by the College.
 - b) A list of Confidential Employees shall be posted at the College.
2. An employee of the College whom the College has designated as confidential under this part for the purpose of providing services to persons related to Sex-Based Harassment. If the employee also has a duty not associated with providing those services, the employee's confidential status is only with respect to information received about Sex-Based Harassment in connection with providing those services; or
3. An employee of the College who is conducting an Institutional Review Board-approved human-subjects research study designed to gather information about Sex-Based Harassment – but the employee's confidential status is only with respect to information received while conducting the study.

(B) **IMPARTIAL EMPLOYEE OR IMPARTIAL MEDIATOR:** An employee who has not participated in the complaint at issue, and has no conflict of interest or bias regarding the matter being addressed. The employee must have training or experience in mediating matters subject to this complaint process.

(C) **NONCONFIDENTIAL EMPLOYEES WITH AUTHORITY:** Allegations involving Sex-Based Harassment shall be reported by all “Nonconfidential Employees with Authority” to the Title IX Coordinator or official designee as soon as the employee becomes aware of it. A Nonconfidential Employee with Authority includes any College employee: who has the authority to take action to redress these offenses; who has been given the duty of reporting to the Title IX Coordinator or other appropriate school designee; or whom a student could reasonably believe has this authority or duty. Nonconfidential Employees with Authority shall include, but are not be limited to, College trustees, administrators, department chairs, program coordinators, campus police, club/activity advisors, coaches, managers or supervisors. Nonconfidential Employees may not maintain the anonymity of the reporting party when they receive a complaint and are required to share this information with the Title IX Coordinator.

(D) **NONCONFIDENTIAL EMPLOYEES WITHOUT AUTHORITY:** A Nonconfidential Employee without Authority includes all other College employees who are not otherwise considered a “Confidential Employee” or a “Nonconfidential Employee with Authority” as defined in this Policy, including but not limited to, faculty, adjunct instructors and staff. “Nonconfidential Employees without Authority” shall either (1) provide the contact information of the Title IX Coordinator and information on how to make a complaint of Sex-Based Harassment or (2) notify the Title IX Coordinator when the employee has information about conduct that reasonably may constitute Sex-Based Harassment. Nonconfidential Employees may not maintain the anonymity of the reporting party and are required to share this information with the Title IX Coordinator.

INFORMAL RESOLUTION: A mutual and voluntary agreement between the parties to resolve the allegations through either mediation or an administrative remedy, that is reached at any time prior to determining whether the alleged conduct occurred.

IMPERMISSIBLE EVIDENCE:

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

PREPONDERANCE OF EVIDENCE: The evidentiary standard used in resolving all complaints filed under this Policy’s Complaint Process. The standard is met if the proposition is

more likely to be true than not true (i.e.; more probable than not). Effectively, the standard is satisfied if there is greater than a 50 percent chance that the proposition is true.

PROHIBITED CONDUCT: The following conduct is prohibited under this Policy:

1. **Discrimination:** An intentional or unintentional act which adversely affects employment and/or educational opportunities because of a person's perceived or actual membership in a protected class or association with a member(s) of a protected class. Discrimination may be classified as either disparate impact (practices that are facially neutral in their treatment of different groups but that in fact fall more harshly on one group than another and cannot be justified by business necessity) or disparate treatment (treatment of an individual that is less favorable than treatment of others based on discriminatory reasons). A single act of discrimination or discriminatory harassment may be based on more than one protected class status. For example, discrimination based on anti-Semitism may relate to religion, national origin, or both; discrimination against a pregnant woman may relate to sex, marital status, or both; or discrimination against a transgender individual may relate to gender identity, sex or sexual orientation.
2. **Discriminatory Harassment:** Discriminatory harassment. A form of discrimination including verbal and/or physical conduct based on legally protected characteristics and/or perceived or actual membership in a protected class that:
 - a. has the purpose or effect of creating an objectively intimidating, hostile or offensive work or educational environment;
 - b. has the purpose or effect of unreasonably interfering with an individual's work or learning performance; or
 - c. otherwise unreasonably adversely affects an individual's employment or educational opportunities.

For purposes of this Policy, conduct constitutes hostile environment harassment when it:

- a. is targeted against an individual(s) on the basis of their membership in a protected class;
- b. is not welcomed by the individual(s); and
- c. is sufficiently severe or pervasive that it alters the conditions of education or employment and creates an environment that a reasonable person would find intimidating, hostile or offensive.

The determination of whether an environment is "hostile" is based on the totality of the circumstances. These circumstances could include the frequency of the conduct, its severity, and whether it is threatening or humiliating.

3. **Retaliation:** Intimidation, threats, coercion, or discrimination against any person by the College, a student, or an employee or other person authorized by the College to provide aid, benefit, or service under the College's education program or activity, for the purpose of interfering with any right or privilege under this Policy. Retaliation includes taking adverse employment or educational action against a person who files claims, complaints or charges under this Policy, or under applicable local, state or federal statute, who is suspected of having filed such claims, complaints or charges, who has assisted or participated in an investigation or resolution of such claims, complaints or charges, or who

has protested practices alleged to be violative of the non-discrimination policy of the College, the BHE, or local, state or federal regulation or statute. Retaliation, even in the absence of provable discrimination in the original complaint or charge, constitutes as serious a violation of this Policy as proved discrimination under the original claim, complaint or charge. Whether a particular action is adverse in any given case would require a fact-specific analysis of how the action would affect a reasonable person in the Complainant's position.

4. Sex-Based Harassment

“Sex-Based Harassment” means any discrimination based on sex (male, female, intersex), including but not limited to, sexual harassment and harassment based on sex stereotypes, sex characteristics, pregnancy or related conditions, sexual orientation, or gender identity,¹ *quid pro quo* harassment, hostile environment harassment, or one of four specific sex offenses referenced in the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act (“Clery Act”) as amended by the Violence Against Women Act of 2013, or any offenses referenced in the Massachusetts Campus Sexual Violence Law of 2021.

(1) *Quid pro quo harassment.* An employee, agent, or other person authorized by the College to provide an aid, benefit, or service under the College's education program or activity explicitly or implicitly conditioning the provision of such an aid, benefit, or service on a person's participation in unwelcome sexual conduct.

(2) *Hostile environment harassment.* Unwelcome sexual-based conduct that, based on the totality of the circumstances, is subjectively and objectively offensive and is sufficiently severe or pervasive that it limits or denies a person's ability to participate or benefit from the College's education program or activity (i.e. creates a hostile environment). Whether a hostile environment has been created is a fact-specific inquiry that includes consideration of the following:

- i. The degree to which the conduct affected the Complainant's ability to access the College's education program or activity;
- ii. The type, frequency, and duration of the conduct;
- iii. The parties' ages, roles within the College's education program or activity, previous interactions, and other factors about each party that may be relevant to evaluating the effects of the conduct;
- iv. The location of the conduct and the context in which the conduct occurred;
- v. Other Sex-Based Harassment in the College's education program or activity; or

(3) *Specific offenses.*

- (i) *Sexual assault*** meaning an offense classified as a forcible or nonforcible sex offense under the uniform crime reporting system by the Federal Bureau of Investigation;
- (ii) *Dating violence*** meaning violence committed by a person:

¹The College will not carry out different treatment or separation on the basis of sex by subjecting a person to more than *de minimis* harm except where permitted in limited circumstances. Adopting a policy or engaging in a practice that prevents a person from participating in an education program or activity consistent with the person's gender identity subjects a person to more than *de minimis* harm on the basis of sex and is a *per se* violation of this Policy.

- A. Who is or has been in a social relationship of a romantic or intimate nature with the victim; and
 - B. Where the existence of such a relationship shall be determined based on a consideration of the following factors:
 - i. The length of the relationship;
 - ii. The type of relationship; and
 - iii. The frequency of interaction between the persons involved in the relationship
- (iii) Domestic violence** meaning felony or misdemeanor crimes committed by a person who:
- A. Is a current or former spouse or intimate partner of the victim under the family or domestic violence laws of the jurisdiction of the College, or a person similarly situated to a spouse of the victim;
 - B. Is cohabitating, or has cohabitated, with the victim as a spouse or intimate partner;
 - C. Shares a child in common with the victim; or
 - D. Commits acts against a youth or adult victim who is protected from those acts under the family or domestic violence laws of the jurisdiction
- (iv) Stalking** meaning engaging in a course of conduct directed at a specific person that would cause a reasonable person to:
- A. Fear for the person's safety or the safety of others; or
 - B. Suffer substantial emotional distress.

PROTECTED CLASS(S)/CLASSIFICATION(S): Characteristics or groups of persons protected from discrimination by law and under this Policy, including:

- a. **Age** - Persons 40 years of age or older.
- b. **Color** - Variations in skin tone among persons of the same race.
- c. **Disability** - A person with a disability is one who has a physical or mental impairment that substantially limits one or more major life activities, has a record of such impairment, or is regarded as having such impairment.
- d. **Ethnicity** - See National Origin.
- e. **Gender Identity** - An individual's sense of their gender as male, female, a blend of both, or neither, which may or may not be different from their sex assigned at birth. Gender identity is a term that covers a multitude of identities including, but not limited to, gender nonconforming individuals, nonbinary individuals, and transgender individuals, and includes any person whose gender identity or gender presentation falls outside of or is perceived to be outside stereotypical gender norms.

- f. Genetic Information** - Any written, recorded individually identifiable result of a genetic test or explanation of such a result or family history pertaining to the presence, absence, variation, alteration, or modification of a human gene or genes.
- g. LGBTQIA+:** Refers to people who are lesbian, gay, bisexual, transgender, queer, questioning, asexual, intersex, nonbinary, or describe their sex characteristics, sexual orientation, or gender identity in another similar way.
- h. National Origin** - A “national origin group” or “ethnic group” is a group sharing a common language, culture, ancestry, and/or other similar social characteristics.
- i. Natural and Protective Hairstyles** – all hairstyles covered under the Massachusetts CROWN Act, including but not limited to, braids, locks, twists, Bantu knots, hair coverings and other formations.
- j. Parental Status:** The status of a person who, with respect to another person who is under the age of 18 or who is 18 or older but is incapable of self-care because of physical or mental disability, is:
- 1) Biological parent;
 - 2) An adoptive parent;
 - 3) A foster parent;
 - 4) A stepparent
 - 5) A legal custodian or guardian;
 - 6) *In loco parentis* with respect to such person; or
 - 7) Actively seeking legal custody, guardianship, visitation, or adoption of such a person.
- k. Persons of Color** - Members of the following racial classifications: Black, American Indian/Native Alaskan, Asian/Pacific Islander, and Hispanic/Latino.
- l. Pregnancy or Related Condition:** Pregnancy, childbirth, termination of pregnancy, or lactation; or medical conditions related to pregnancy, childbirth, termination of pregnancy, or lactation; or recovery from pregnancy, termination of pregnancy, lactation or related medical conditions.
- m. Race** - Discrimination laws do not contain a definition of “race,” but are interpreted to prohibit discrimination on the basis of ancestry or physical or cultural characteristics associated with a certain race, such as skin color, hair texture or styles, or certain facial features, and on the basis of stereotypes and assumptions about abilities, traits, or the performance of individuals of certain racial groups. All individuals, including persons of more than one race and the following racial classifications, are protected from discrimination:
- Black: All persons having origins in any of the Black racial groups of Africa.
 - White (not of Hispanic origin): Persons having origins in any of the original peoples of Europe, North Africa, or the Middle East.

- Hispanic/Latino: All persons of Mexican, Puerto Rican, Cuban, Central, Latin or South American or other Spanish culture or origin, regardless of race.
 - Cape Verdean: All persons having origins in the Cape Verde Islands.
 - Asian or Pacific Islander: All persons having origins in any of the original peoples of the Far East, Southeast Asia, the Indian Subcontinent or the Pacific Islands, including, for example, the areas of China, India, Japan, Korea, the Philippine Islands and Samoa.
 - American Indian or Alaskan Native: All persons having origins in any of the original peoples of North America, and who maintain cultural identification through tribal affiliation or community recognition.
- n. Religion** - “Religion” and “creed” have the same or equivalent meaning: all religious and spiritual observances, practices, and sincerely held beliefs.
- o. Sex Characteristics:** Sex characteristics is intended to refer to physiological sex-based characteristics. Discrimination based on a person’s physiological sex characteristics may include discrimination based on a person’s anatomy hormones, and chromosomes associated with male or female bodies. Discrimination on the basis of sex characteristics includes discrimination based on intersex traits.
- p. Sexual Orientation** - Actual or perceived heterosexuality, homosexuality, bisexuality, pansexuality, or asexuality either by orientation or by practice, including but not limited to LGBTQIA+ people as defined in this policy.
- q. Sex Stereotypes:** Fixed or generalized expectations regarding a person’s aptitudes, behavior, self-presentation, or other attributes based on sex.
- r. Veteran** - Any person who is a member of, applies to perform, or has an obligation to perform, service in a uniformed military service of the United States, including the National Guard.

If at any time subsequent to the implementation of this Policy, additional protected classifications are established, individuals in those classifications shall be protected against discrimination under this Policy.

RESPONDENT OR RESPONDING PARTY: The person against whom a complaint is directed, including an individual who has been reported to be the perpetrator of conduct that could constitute Sex-Based Harassment. Only a person in their individual capacity can be a Respondent in a complaint process. The Respondent is presumed not responsible.

SUPPORTIVE MEASURES: Supportive measures means individualized measures offered as appropriate, as reasonably available, without unreasonably burdening a Complainant or Respondent, not for punitive or disciplinary reasons, and without fee or charge to the Complainant or Respondent to:

1. Restore or preserve that party's access to the College's education program or activity, including measures that are designed to protect the safety of the parties or the College's educational environment; or
2. Provide support during the College's complaint processes or during an informal resolution process or mediation.

TIME: The number of days indicated at each level shall be considered as a maximum. All reasonable efforts shall be made to expedite the process, but the President or their designee may extend the time limits in extenuating circumstances with notice to the parties in writing, or by mutual written agreement between the parties.

TITLE IX COORDINATOR: A College employee, or their designee, assigned the responsibility for maintaining the College's compliance with Title IX, the Massachusetts Campus Sexual Violence Law of 2021, and the related policies of the College. The Title IX Coordinator is responsible for administering this Policy, the Sex-Based Harassment Policy, and its Sex-Based Harassment Complaint Process. The Title IX Coordinator may also serve as the College's Affirmative Action Officer. If these positions are held by different individuals, the AAO and the Title IX Coordinator may collaborate on the enforcement of any aspect of this Policy. The Title IX Coordinator should not have other job responsibilities that may create a conflict of interest. For example, serving as the Title IX Coordinator and a disciplinary hearing board member or general counsel may create a conflict of interest. There may also be a Deputy Title IX Coordinator designated to assist the Title IX Coordinator in the performance of their duties. The College's Title IX Coordinator is Shannon Overcash, Associate Director of Compliance/Title IX Coordinator and can be contacted at sovercash@qcc.mass.edu 508-854-7408.

D. SPECIFIC POLICIES

I. SUPPORT OF AND COMMITMENT TO DIVERSITY

The Community Colleges have historically been a major contributing element to the emergence of our nation as one of the most technologically and economically advanced societies of the world. The important role that the Community Colleges can play is profoundly dependent upon the extent to which they may draw from the full collective of intellectual resources within each College's community of scholars, students, and administrators. Any condition or force that impedes the fullest utilization of the human and intellectual resources available represents a force of destructive consequence for the development of our Commonwealth, and ultimately, our nation.

Community College students, faculty, staff and visitors must be free from conduct that has the purpose or effect of interfering with an individual's academic or professional performance and creating an intimidating, hostile or demeaning educational or employment environment. Therefore, the Community Colleges establish a policy of unequivocal condemnation of all forms of ethnic, religious, cultural, or racial intolerance within the fifteen College communities.

This policy condemns all conditions and all actions or omissions, including all acts of verbal harassment or abuse, which deny or have the effect of denying to an individual their rights to equality, dignity and security in violation of their rights guaranteed under the law. The policy reaffirms the doctrine of civility, appreciation for pluralism and the pre-eminence of individual human dignity as preconditions to the achievement of an academic community that recognizes and utilizes the resources of all persons while recognizing and reaffirming the tenets of academic freedom as stated in applicable collective bargaining agreements. The Community Colleges recognize their obligation to protect the rights of free inquiry and expression, and nothing herein shall be construed or applied so as to abridge the exercise of rights under the Constitution of the United States and other federal and state laws.

The Community Colleges will vigorously strive to achieve diversity sufficiently reflective of our society. However, diversity alone will not suffice. There must be a unity and cohesion in the diversity that we seek to achieve, thereby creating an environment of pluralism.

The Community Colleges bear a responsibility by edict and an obligation by social morality to promote understanding and acceptance of ethnic, cultural, religious and racial diversity as we strive to create an atmosphere of dignity for all individuals and groups within our system of public higher education. The President or their designee will take reasonable measures to prevent and discourage harassment and will act positively to investigate alleged harassment and to affect a remedy or resolution when an allegation is determined to be valid.

II. POLICY AGAINST PROHIBITED CONDUCT

a. Introduction

The mission of the Community Colleges is to educate, train and prepare our students to live and work in our increasingly global and diverse workforce. It is our commitment to take all possible steps to provide an inclusive and diverse learning, living, and work environment that values diversity and cultural tolerance and looks with disfavor on intolerance and bigotry. Any condition or force that impedes the fullest utilization of the human and intellectual resources available represents a force of destructive consequences for the development of our Commonwealth and ultimately, our nation.

b. Definitions

Prohibited Conduct includes: Discrimination, Discriminatory Harassment, Sex-Based Harassment and Retaliation. These terms and all Protected Class(s)/Classification(s) are defined under the “Definitions” section of this Policy.

c. Policy Prohibitions

The Policy prohibits all conditions and all actions or omissions, which deny or have the effect of denying to any person their rights to equity and security on the basis of their membership in or association with a member(s) of any protected class. This policy reaffirms the values of civility, appreciation for racial/ethnic/cultural/religious pluralism and pre-eminence of individual human dignity as preconditions to the achievement of an academic community, which recognizes and utilizes the resources of all people.

In order to promote an atmosphere in which diversity is valued and the worth of individuals is recognized, the Colleges will distribute policy statements and conduct educational programs to combat all Prohibited Conduct.

The prohibition on Prohibited Conduct contained in this Policy shall apply to and be enforced against all members of the College community, including, but not limited to, faculty, librarians, administrators, staff, students, vendors, contractors and all others having dealings with the institution.

d. Conduct That is Not Prohibited

The Community Colleges are committed to protecting, maintaining and encouraging both freedom of expression and full academic freedom of inquiry, teaching, service, and research. Nothing in this Policy shall be construed to penalize a member of the College community for expressing an opinion, theory, or idea in the process of responsible teaching and learning. Accordingly, any form of speech or conduct that is protected by the principles of academic freedom or the First Amendment to the United States Constitution is not subject to this policy.

e. Complaint Procedures

The Community Colleges have established a specific internal procedure to help resolve claims and complaints of violations of this Policy on their campuses (see Section L “Complaint Procedures)). Any current or former student(s) or employee(s), or current or former applicant for admission or employment, or a person other than a student or employee if they were participating or attempting to participate in the College’s education program or activity, who believes that they have been subjected to Prohibited Conduct may initiate a complaint as outlined herein. Prohibited Conduct that occurs under a recipient’s education program or activity includes, but is not limited to, conduct that occurs in a building owned or controlled by a student organization that is officially recognized by the College, and conduct that is subject to the College’s disciplinary authority. Further advice or information may be obtained by contacting the Affirmative Action Officer or Title IX Coordinator.

f. Duty to Cooperate

Every faculty member, librarian, administrator, staff member, employee, agent, or other person authorized by the College to provide aid, benefit, or service under the College’s education or activity has a duty to cooperate fully and unconditionally in an investigation conducted pursuant to this Policy’s Complaint Procedure, subject to the provisions of any relevant collective bargaining agreements. In addition, every individual participating or attempting to participate in the College’s education program or activity has a duty to cooperate fully and unconditionally in an investigation conducted pursuant to this Policy’s Complaint Procedure.

This duty includes, among other things, speaking with the Affirmative Action Officer, Title IX Coordinator or other authorized personnel or investigator and voluntarily providing all information and documentation which relates to the claim being investigated. The failure and/or refusal of any employee to cooperate in an investigation may result in disciplinary action up to and including termination.

g. Duty to Report

- **General Responsibility to Report Prohibited Conduct**

No member of the College community who receives a complaint of Prohibited Conduct can ignore it; they should give to the person making the complaint as much assistance in bringing it to the attention of the Affirmative Action Officer or Title IX Coordinator as is reasonably appropriate given their position at the College and relationship with the person making the complaint.

- **Reporting of Sex-Based Harassment by Nonconfidential Employees**

Allegations involving Sex-Based Harassment shall be reported by all “Nonconfidential Employees with Authority” to the Title IX coordinator or official designee as soon as the employee becomes aware of it. A Nonconfidential Employee with Authority includes any College employee: who has the authority to take action to redress Sex-Based Harassment; who has been given the duty of reporting Sex-Based Harassment to the Title IX Coordinator or other appropriate school designee; or whom a student could reasonably believe has this authority or duty. Nonconfidential Employees with Authority shall include, but are not be limited to, College trustees, administrators, department chairs, program coordinators, campus police, club/activity advisors, coaches, managers or supervisors.

“Nonconfidential Employees without Authority”, which consists of all other College employees, including but not limited to, faculty, adjunct instructors and staff, shall either (1) notify the Title IX Coordinator when the employee has information about conduct that reasonably may constitute Sex-Based Harassment or (2) provide the contact information of the Title IX Coordinator and information on how to make a complaint of Sex-Based Harassment.

Nonconfidential Employees may not maintain the anonymity of the reporting party and are required to share this information with the Title IX Coordinator.

- **Failure to Report by Nonconfidential Employees**

Incidents of Failure to Report by Nonconfidential Employees will be investigated by the Title IX Coordinator as a violation of this Policy. A Nonconfidential Employee found responsible for failing to notify the Title IX Coordinator of conduct that reasonably may constitute Sex-Based Harassment or failing to provide an individual with the contact information of the Title IX Coordinator and information on how to make a complaint of Sex-Based Harassment, may be subject to discipline. Discipline for violating this Policy may include, but is not limited to, mandatory counseling or training, verbal or written warnings, suspension, termination from employment, and/or expulsion from the College.

- **Mandatory Reporting of Abuse Under State Law**

Children (a person under the age of 18) may be students at the College, or may be engaged in activities sponsored by the College or by third-parties utilizing College facilities. In such instances, where an employee has reasonable cause to believe that a child is suffering physical or emotional injury, resulting from among other causes, sexual abuse, including Sex-Based Harassment, the employee and the College may be obligated to comply with the mandatory reporting requirements established at M.G.L. Chapter 119, Section 51A-E. In such cases, the employee is directed to immediately report the matter to the College’s Affirmative Action and/or Title IX Coordinator, who, in consultation with other officials, shall contact the Commonwealth’s Department of Children and Families and/or law enforcement. An employee may also contact local law enforcement authorities or the Department of Children and Families directly in cases of suspected abuse or neglect. State law also maintains mandatory reporting requirements for certain occupations where abuse or neglect is suspected of adults age 60 or older or children and adults with disabilities. For more information on these reporting requirements please contact the College’s Affirmative Action Officer or Title IX Coordinator.

Any member of the College community who has a question about their responsibilities under this Policy should contact the Affirmative Action Officer or Title IX Coordinator.

III. SEX-BASED HARASSMENT POLICY

a. Introduction

It is the goal of the Community Colleges to promote an educational environment and workplace that is free of all forms of Sex-Based Harassment. Sex-Based Harassment of students or employees occurring in or limiting access to an education program, activity, or workplace will not be tolerated by the College. Further, any retaliation against an individual who has reported information, made a complaint, testified, assisted, or participated or refused to participate in any manner in an investigation, proceeding, or hearing under this part, including in an informal resolution process, in complaint processes, or in any other actions taken by a College will not be tolerated. To achieve our goal of providing a campus and workplace free from Sex-Based Harassment, the conduct that is described in this policy will not be tolerated and we have provided a procedure by which inappropriate conduct will be dealt with, if encountered by students or employees.

Because the Community Colleges take allegations of Sex-Based Harassment seriously, we will respond promptly to complaints of Sex-Based Harassment and where it is determined that inappropriate conduct has occurred, we will act promptly to eliminate the conduct and impose such corrective measures, including disciplinary action where appropriate and consistent with applicable collective bargaining agreements.

The Community Colleges do not discriminate on the basis of sex and prohibit Sex-Based Harassment in any education program, activity, or workplace that it operates, as required by Title IX, including in admission and employment.

The College will provide a notice of nondiscrimination to students; employees; applicants for admission and employment; and all unions and professional organizations holding collective bargaining or professional agreements with the College.

Inquiries about Title IX maybe referred to the College's Title IX Coordinator, the U.S. Department of Education's Office for Civil Rights, or both.

The College's Title IX Coordinator is *[name or title, office address, email address, and telephone number]*.

The College's nondiscrimination policy and complaint processes can be located at *[include link to location(s) on website or otherwise describe location(s)]*.

To report information about conduct that may constitute Sex-Based Harassment or make a complaint of Sex-Based Harassment under Title IX, please refer to *[include link to location(s) on website or otherwise describe location(s)]*.

b. Definition of Sex-Based Harassment

Sex-Based Harassment, as defined under the “Definitions” section of this Policy, means any discrimination based on sex, including but not limited to, sexual harassment and harassment based on sex stereotypes, sex characteristics, pregnancy or related conditions, sexual orientation, or gender identity, *quid pro quo* harassment, hostile environment harassment, or one of four specific sex offenses referenced in the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act (“Clery Act”) as amended by the Violence Against Women Act of 2013, or any offenses referenced in the Massachusetts Campus Sexual Violence Law of 2021.

All employees and students should take special note that, as stated above, retaliation against an individual who has made a complaint about Sex-Based Harassment, or retaliation against individuals who have cooperated with an investigation of Sex-Based Harassment will not be tolerated by the Community Colleges.

c. Confidential Reporting Resources

Persons who have experienced prohibited forms of Sex-Based Harassment under this Affirmative Action Policy may share information confidentially with Confidential Employees who cannot reveal identifying information to any third party unless one or more of the following conditions is present:

- the individual has provided written consent to disclose information;
- there is a concern about imminent harm to self or others;
- the information concerns the neglect or abuse of someone who is a minor, elderly, or disabled; or
- an employee is responsible for providing non-identifiable information for purposes of the Clery Act.

Please bear in mind, however, that if one requests certain supportive measures from the College (e.g., extension for academic work, or changing classes or work locations), other College officials may be contacted only for the purpose of providing the requested measures. In such cases, one’s privacy will be maintained to the extent that respecting confidentiality will not impair the College’s ability to provide the requested measures. One may also confidentially report any form of Sex-Based Harassment, sexual assault, domestic violence, dating violence, stalking, and/or retaliation as well as other forms of sexual violence and gender-based harassment to community support resources, which are not required to share information with the College.

Confidential resources include those who provide privileged and confidential support, such as physicians and clergy, regardless of whether they are employed by the College.

d. Complaints of Sex-Based Harassment

All Complaints of Sex-Based Harassment shall proceed under this Policy’s Complaint Process. To make a complaint a person may do so by contacting the College’s Title IX Coordinator. The individuals who have a right to make a complaint of Sex-Based Harassment include a Complainant; a parent, guardian, or other authorized legal representative with the legal right to act on behalf of a Complainant, and the Title IX Coordinator.

In the absence of a complaint or the withdrawal of any or all of the allegations in a complaint, and in the absence or termination of an informal resolution process, the Title IX Coordinator may determine whether to initiate a complaint of Sex-Based Harassment. To make this fact-specific determination, the Title IX Coordinator must consider, at a minimum, the following factors:

- (1) The Complainant's request not to proceed with initiation of a complaint;
- (2) The Complainant's reasonable safety concerns regarding initiation of a complaint;
- (3) The risk that additional acts of Sex-Based Harassment would occur if a complaint is not initiated;
- (4) The severity of the alleged Sex-Based Harassment, including whether a violation, if established, would require the removal of a Respondent from campus or imposition of another disciplinary sanction to end the Sex-Based Harassment and prevent its recurrence;
- (5) The age and relationship of the parties, including whether the Respondent is an employee of the College;
- (6) The scope of the alleged Sex-Based Harassment, including information suggesting a pattern, ongoing Sex-Based Harassment, or Sex-Based Harassment alleged to have impacted multiple individuals;
- (7) The availability of evidence to assist a Title IX Coordinator in determining whether Sex-Based Harassment occurred; and
- (8) Whether the College could end the alleged Sex-Based Harassment and prevent its recurrence without initiating a complaint.

e. Sex-Based Harassment Investigation

A Complaint of Sex-Based Harassment will be promptly investigated in a fair and expeditious manner. The investigation will be conducted in such a way as to maintain confidentiality to the extent practicable under the circumstances. Our investigation will be conducted in accordance with this Policy's Complaint Process and may include a private interview with the person filing the complaint and with witnesses. The person alleged to have committed Sex-Based Harassment will also be interviewed.

The investigation process for complaints of Sex Based Harassment enables the Title IX Coordinator to question parties and witnesses to adequately assess a party's or witness's credibility to the extent credibility is both in dispute and relevant to evaluating one or more allegations of Sex-Based Harassment. The Title IX Coordinator may choose to place less or no weight upon statements by a party or witness who refuses to respond to questions deemed relevant and not impermissible, however, the Title IX Coordinator must not draw an inference about whether Sex-Based Harassment occurred based solely on a party's or witness's refusal to respond to such questions.

Once the investigation is complete, the College will, to the extent appropriate, inform the parties of the results of that investigation.

If it is determined that a violation of this Policy has occurred, the College will act promptly to eliminate the offending conduct, and where it is appropriate also impose disciplinary sanctions.

f. Disciplinary Action

Discipline for violating this Policy may include, but is not limited to, mandatory counseling or training, verbal or written warnings, suspension, termination from employment, or expulsion from the College.

g. Consensual Relationships

• Faculty/Administrator/Staff Member Relationships with Students

A romantic and/or sexual relationship, consensual or otherwise, between a faculty member, administrator or staff member and a student is looked upon with disfavor and is strongly discouraged. No faculty member shall have a romantic and/or sexual relationship, consensual or otherwise, with a student who is being taught or advised by the faculty member or whose academic work is being supervised or evaluated, directly or indirectly, by the faculty member. No administrator or staff member shall have a romantic and/or sexual relationship, consensual or otherwise, with a student who the administrator or staff member supervises, evaluates, advises, or provides other professional advice or services as part of a College program or activity.

• Relationships Between Supervisors, Subordinates or Co-Workers

A consenting romantic and/or sexual relationship between a supervisor and subordinate or co-workers may interfere with or impair the performance of professional duties and responsibilities and/or create an appearance of bias or favoritism. Further, such relationships could implicate state ethics laws and/or result in claims of Sex-Based Harassment or retaliation. Therefore, such workplace relationships are strongly discouraged.

h. Identification

Personally identifiable information about parties of Sex-Based Harassment will be treated as confidential and only shared with persons with a specific need to know and/or who are investigating and/or adjudicating the complaint, delivering resources or support services to the Complainant or as public safety requires. The College does not publish the names or other identifiable information of parties of Sex-Based Harassment in the campus police department's Daily Crime Log, in any Timely Warnings issued or online. In accordance with the Family Educational Rights and Privacy Act (FERPA), an individual may request that no directory information maintained by the College be released absent their prior, written consent.

i. Supportive Measures

Title IX requires the College to offer and coordinate, as appropriate, as reasonably available, non-disciplinary/non-punitive reasonable steps to preserve or restore equal access to its education programs and activities. Supportive measures protect individuals from any Sex-Based Harassment

or other Prohibited Conduct, including offering supportive measures during the investigation or informal resolution process, irrespective of whether the Complainant ever chooses to file a Complaint. Such measures must not unreasonably burden either party, must not be for punitive or disciplinary reasons, and must be without fee or charge to either party. The College shall take these steps promptly once it has notice of an allegation of Sex-Based Harassment. Examples of interim protective measures include, but are not limited to, the following:

- Counseling;
- Extensions of deadlines or other course-related adjustments (for example: changing class schedule, withdrawal without penalty, providing student services such as tutoring, alternate class completion options);
- Modifications of work schedules or job assignments;
- Campus escort services;
- Increased security and monitoring of certain areas of the campus;
- Restrictions on contact applied to one or more parties;
- Changes in class, work housing, or extracurricular, or any other activity, regardless of whether there is or is not a comparable alternative;
- Leaves of absence;
- Training and education programs related to Sex-Based Harassment; and
- Other similar measures.

The specific supportive measures implemented and the process for implementing those measures will vary depending on the facts of each case. The College will consider a number of factors in determining what supportive measures to take, including, for example, the specific needs expressed by either party; the severity or pervasiveness of the allegations; any continuing effects on either party; whether the parties share the same classes, dining schedule, transportation, or job location; and whether other judicial measures have been taken to protect either/both parties (*e.g.*, civil protection orders).

In general, when taking supportive measures, the College shall minimize the burden on either party. The College must maintain as confidential any supportive measures provided to either party, to the extent that maintaining such confidentiality would not impair the ability of the College to provide the supportive measures.

j. Amnesty

Students may be hesitant to report Sex-Based Harassment out of concern that they, or witnesses, might be charged with violations of the College's drug/alcohol policy and/or the Student Code of Conduct. While the College does not condone such behavior, it places a priority on addressing allegations of Sex-Based Harassment. Accordingly, the College may elect not to pursue discipline against a student who, in good faith, reports, witnesses or possesses personal knowledge of an incident of Sex-Based Harassment.

k. Protections for Complainant Regarding Sexual Assault

A person subjected to Sexual Assault shall:

- Be provided with a copy of the College's *Sex-Based Harassment – Complainant's Rights and Information Advisory*, which shall include information concerning counseling, health, and mental health services, victim advocacy and support, law enforcement assistance, and other services available on and off campus;
- Have the right to pursue, or not pursue, assistance from campus administration officials or campus law enforcement;
- Not be discouraged by College officials from reporting an incident to both on-campus and off-campus authorities;
- Be provided assistance in contacting local law enforcement if requested and have the full and prompt assistance and cooperation of campus personnel should a civil and/or criminal complaint be pursued;
- Be free from any suggestion that they somehow contributed to or had a shared responsibility in the violent act;
- Receive the same level of support at any proceeding before College officials as is permitted to the accused party, including the presence of an advisor during any disciplinary proceeding and the right to be notified in a timely manner of the outcome of such proceedings and any appeal right available;
- Receive full and prompt cooperation from College personnel in obtaining and securing evidence (including medical evidence) necessary for any potential criminal proceedings;
- Have access to existing College counseling and medical professionals, victim support services, and to obtain referrals to off-campus counseling and support services if desired;
- Be permitted to attend classes, work and participate in College activities free from unwanted contact or proximity to the Respondent insofar as the College is permitted and able;
- Be permitted to request changes to an academic schedule if such changes are requested by the alleged victim and are reasonably available; and
- Be informed of any no-contact or no-trespass orders issued to the Respondent by the College and the College's commitment to honor any court-issued restraining or protective orders, to the extent permitted by law.

I. Recommended Procedures for a Victim of Sexual Assault

For a person subjected to an act of sexual assault, there can be time-sensitive decisions to make about sexually transmitted infections, pregnancy, and collecting physical evidence in the event of prosecution. Individuals who have been victims of sexual assault are advised as follows:

- **Protect Yourself and Get Medical Attention** – A victim should be advised to go to a safe place as soon as possible and seek medical attention immediately. Injuries and exposure to disease may not be immediately apparent. A medical examination can provide necessary treatment and collect important evidence. It is recommended that a physical exam be conducted within 72 hours of the sexual assault. Submitting to a physical exam does not mean that a victim is required to press charges. This action merely preserves the option to do so. Designated College personnel can assist in providing transportation to the hospital.
- **Preserve Evidence** - It is important to preserve all physical evidence following an act of sexual assault. Physical evidence may be necessary in the event criminal prosecution is pursued. If possible, a victim should be advised not to wash, eat, drink, douche, clean, use the bathroom, or change clothes. If clothes are changed, all clothes that were worn at the time of the incident should not be cleaned and should be placed into an unused or a clean paper bag.
- **Health and Support Services** - Various health and support services are available on and off campus for students and employees who have experienced sexual assault. For information about such services, including counseling, please contact the Title IX Coordinator.

m. Rape Crisis Center Contact Information²

Rape Crisis Centers offer FREE services to survivors of sexual assault, including:

- 24/7 hotline counseling, information, and referral;
- Will go with survivors to hospitals and/or police stations 24/7;
- Will go with a survivor to court;
- Provide one-to-one counseling and support group counseling; and
- Provide primary prevention education; professional training; outreach.

Central Massachusetts

Rape Crisis Center of Central Mass., Worcester, 800-870-5905 Hotline, 888-887-7130 TTY

Rape Crisis Center of Central Mass., Milford, 800-511-5070 Hotline, 508-478-4205 TTY

Greater Boston Area

Boston Area Rape Crisis Center, Cambridge, 1-800-841-8371 Hotline, 617-492-8306 TTY

Northeastern Massachusetts

YWCA Northeastern Massachusetts, (877) 509-9922, TTY: (978) 686-8840

Rape Crisis Services of Greater Lowell, 800-542-5212 Hotline, 978-452-8723 TTY

² Contact information for Massachusetts Rape Crisis Centers ***may be subject to change***. Current contact information can be found at the Commonwealth's Executive Office of Health and Human Services' Website under "Consumer" information at <http://www.mass.gov/eohhs/> or <https://www.mass.gov/info-details/rape-crisis-centers>.

YWCA North Shore Rape Crisis Center, Lynn, (800) 509-9922 Hotline

Southeastern Massachusetts

A Safe Place, Nantucket, 508-228-2111 Hotline, 508-228-7095 TTY

Independence House, Hyannis, 800-439-6507 Hotline, 508-771-6782 TTY

Women Support Services, Vineyard Haven, 508-696-7233 Hotline, 774-549-9659 TTY

Greater New Bedford Women Center, New Bedford, 508-996-6636 Hotline, 508-996-1177 TTY

New Hope, Attleboro, 800-323-4673 Hotline, 508-323-4673 TTY

Womansplace Crisis Center, Brockton, 508-588-8255 Hotline, 508-894-2869 TTY

Western Massachusetts

Elizabeth Freeman Center, Pittsfield, 866-401-2425 Hotline, 413-499-2425 TTY

Everywoman Center, Amherst, 413-545-0800 Hotline, 413-577-0940 TTY

NELCWIT, Greenfield, 413-772-0806 Hotline, 413-772-0815 TTY

YWCA, Springfield, 800-796-8711, 413-733-7100 TTY

n. State and Federal Remedies

Filing a complaint under this Policy does not prohibit you from filing a formal complaint with the governmental agencies set forth below.

Massachusetts Commission Against Discrimination ("MCAD")

Boston Office:

One Ashburton Place
Rm. 601
Boston, MA 02108
(617) 994-6000

Worcester Office:

Worcester City Hall
18 Chestnut St., Rm. 520
Worcester, MA 01608
(508) 453-9630

Springfield Office:

436 Dwight St., Rm. 220
Springfield, MA 01103
(413) 739-2145

United States Equal Employment Opportunity Commission ("EEOC")

15 New Sudbury Street
Room 475, MA 0203-0506
1-800-669-4000

United States Department of Education Office For Civil Rights ("OCR")

5 Post Office Square, 8th Floor
Boston, MA 02109
(617) 289-0111

IV. NON-DISCRIMINATION AND ACCOMMODATION FOR PERSONS WITH DISABILITIES

It is illegal to discriminate against an otherwise qualified individual with a disability. The Community Colleges recognize the multitude of barriers that confront persons with disabilities in access to both employment and education. Consistent with state and federal statutes that affirm and protect the equal opportunity rights of persons with disabilities, the Community Colleges adopt

a policy of non-discrimination and equal opportunity for otherwise qualified persons with disabilities. Any employee or student who believes they have been a victim of discrimination due to a disability may file a complaint pursuant to the Complaint Procedures found at Section L of this Policy.

a. In Employment

The Community Colleges will take constructive measures to ensure equal opportunity in all areas of employment including recruitment, selection, upgrading, opportunities for training and development, rate of compensation, benefits and all other terms and conditions of employment. Further, the Colleges will periodically examine all existing employment policies, practices and facilities to ensure that they do not pose a disparate impact for otherwise qualified persons with disabilities. Where such disparity is found, it will be corrected as quickly and completely as is reasonable under existing circumstances. Accordingly, all College facilities may not be available and accessible at a particular time.

b. In Education

The Colleges will periodically examine all existing admissions, student support and other student life policies, practices and facilities to assure that they do not pose a disparate impact for otherwise qualified disabled students. Where such disparity is found, it will be corrected as quickly and completely as is reasonable under existing circumstances. Accordingly, all College facilities may not be available and accessible at a particular time. The Colleges will adopt a policy of non-discrimination with respect to admissions, access to programs and facilities and services for all otherwise qualified disabled persons.

c. Reasonable Accommodations

A “reasonable accommodation” under state and federal law is defined as “modifications or adjustments to an application process, job, work environment, the way in which work is customarily performed, or a course of study that permit a qualified individual with a disability to perform the essential functions of a position or to enjoy the benefits and privileges of employment or education equally with persons without disabilities.”

Reasonable accommodations in employment may include, but are not limited to:

- Making existing facilities used by employees readily accessible to and usable by persons with disabilities;
- Job restructuring;
- Modification of work schedules;
- Providing additional unpaid leave;
- Acquiring or modifying equipment or devices; and
- Providing qualified readers or interpreters.

The Community Colleges are not required to lower performance standards to make an accommodation and are not obligated to provide personal use items, such as eyeglasses or hearing aids.

Reasonable accommodations in education may include, but are not limited to:

- In-class aids, such as note takers;
- Extended time for examination;
- Quiet rooms or alternate locations for testing;
- Alternatively formatted testing; alternatively formatted textbooks and other course materials; and/or
- Access to assistive technology.

Possible course reductions or substitutions on the basis of a disability will be carefully evaluated. Students with disabilities must meet the essential requirements of all academic degree programs.

d. Interactive Process

State and federal laws define the “interactive process” as an ongoing communication between employer and employee or college and student, in an effort to provide reasonable accommodation for an individual with a known disability. Both parties must engage in the interactive process and communicate directly with each other in order to formulate an effective accommodation plan. Neither party can delay nor interfere with the process.

e. Undue Hardship and Fundamental Alteration

The Community Colleges are required to make reasonable accommodations to qualified individuals with disabilities unless doing so would impose an undue hardship on the operation of a College’s business or result in a fundamental alteration of a job or academic course or program. Undue hardship means an action that requires significant difficulty or expense when considered in relation to factors such as a College’s size, financial resources, and the nature and structure of its operation. Fundamental alteration is a change that is so significant that it alters the essential nature of a job or an academic course or program.

f. Process for Requesting a Reasonable Accommodation

An employee or job applicant seeking a reasonable accommodation for a disability may contact the College’s Office for Human Resources. A student or student applicant seeking a reasonable accommodation for a disability may contact the College’s Office that provides disability and accessibility services. All requests for reasonable accommodation are evaluated on a case-by-case basis. Individuals seeking reasonable accommodations should be prepared to submit current medical documentation for review in the accommodation process. The College reserves the right to review approved reasonable accommodations on a periodic basis and request updated medical documentation at that time.

V. ACCOMMODATIONS FOR PARENTAL STATUS, PREGNANCY AND PREGNANCY-RELATED CONDITIONS

In accordance with the requirements of state and federal law, the College prohibits discrimination against students, employees, and applicants based on parental status, pregnancy, childbirth,

termination of pregnancy, lactation, related medical conditions, or recovery. Furthermore, the College provides reasonable accommodations for parental status, pregnancy and pregnancy-related conditions, including modifications for students, reasonable break time for employees for lactation, and one or more clean, private lactation spaces, that is not a bathroom, for both students and employees. The Title IX Coordinator coordinates specific actions to ensure equal access to employment, education programs, and activities.

a. Parental Status

The adoption or implementation of any policy, practice, or procedure concerning the current, potential, or past parental, family, or marital status of a student or applicant that treats persons differently on the basis of sex is a violation of this Policy.

b. Student Accommodations for Pregnancy or Pregnancy-Related Conditions

Once the Title IX Coordinator is notified of the student's pregnancy or pregnancy-related condition, the College will:

- Inform the student of the College's obligations to students who are pregnant or experiencing a pregnancy-related condition.
- Provide the student with reasonable accommodations as needed to ensure equal access to the College's education program or activity.
- Allow the student a voluntary leave of absence for, at minimum, the medically necessary time period and reinstatement upon return, including reinstatement to the status held by the student when the leave began.
- Ensure the student's access to a clean, private space for lactation that is not a bathroom.

Reasonable modification may include, but are not limited to, the following:

- Breaks during class to express breast milk, breastfeed, or attend to health needs associated with pregnancy or related conditions, including eating, drinking, or using the restroom;
- Intermittent absences to attend medical appointments;
- Changes in schedule or course sequence;
- Extensions of time for coursework and rescheduling of tests and examinations;
- Allowing a student to sit or stand, or carry or keep water nearby;
- Counseling;
- Changes in physical space or supplies (for example, access to a larger desk or a footrest);
- Elevator access;
- Or other changes to policies, practices, or procedures.

The College does not require supporting documentation from a student, unless doing so is necessary and reasonable as determined by the Title IX Coordinator.

c. Employee Accommodations for Pregnancy or Pregnancy-Related Conditions

Upon the request from the employee or prospective employee, the College will engage in a timely, good faith, and interactive process to determine an effective, reasonable accommodation to enable the employee to perform the essential functions of the position.

Through the interactive process, the College will provide necessary, reasonable accommodations that will allow an employee to perform the essential functions of the job while pregnant or experiencing pregnancy-related conditions unless doing so would impose an undue hardship on the College. The College recognizes that it cannot make an employee accept a particular accommodation if another reasonable accommodation would allow the employee to perform the essential functions of the job, or require an employee to take a leave if another reasonable accommodation may be provided without undue hardship.

Reasonable accommodations may include, but are not limited to, the following:

- Reasonable break time for lactation;
- Access to a clean and private lactation space;
- More frequent or longer paid or unpaid breaks;
- Time off to attend to a pregnancy-related condition or recover from childbirth with or without pay;
- Acquisition or modification of equipment or seating;
- Temporary transfer to a less strenuous or hazardous position;
- Job restructuring;
- Assistance with manual labor; and/or
- Modified work schedule.

The Title IX Coordinator may require documentation regarding the need for an accommodation from a healthcare professional that explains what accommodation(s) the employee needs, but it cannot require documentation for the following accommodations: (1) more frequent restroom, food, or water breaks; (2) seating; (3) limits on lifting more than 20 pounds; and (4) a clean, private space for lactation.

VI. CONTRACTING AND PURCHASING

When selecting contractors, suppliers, and vendors of goods and services, including goods and services secured in connection with construction projects, the Colleges will offer equal opportunity to all qualified persons and entities and will not discriminate on the basis of a protected classification.

The College shall use reasonable efforts to attract and encourage bid proposals from a diverse pool of qualified contractors, subcontractors, vendors and suppliers. The College is strongly encouraged to identify businesses primarily operated by individuals within the protected classifications with the help of the Commonwealth's Supplier Diversity Office.

When transacting business with contractors, vendors and suppliers, the Community Colleges shall include in all contracts the following statement:

Non-Discrimination in Employment: The Contractor shall not discriminate in the hiring of any applicant for employment nor shall any qualified employee be

demoted, discharged or otherwise subject to discrimination in the tenure, position, promotional opportunities, wages, benefits or terms and conditions of their employment because of race, color, national origin, ancestry, age, sex, sexual orientation, gender identity, religion, genetic information, parental leave, military service, marital status, handicap, disability, or for exercising any rights afforded by law. The Contractor commits to purchasing supplies and services from certified minority or women-owned businesses, small businesses or businesses owned by socially or economically disadvantaged persons or persons with disabilities. The Contractor agrees to comply with applicable federal and state laws, rules and regulations prohibiting discrimination in employment and unfair labor practices, including Title VII of the Civil Rights Act of 1964, the Age Discrimination in Employment Act of 1967, Section 504 of the Rehabilitation Act of 1973, the Americans With Disabilities Act of 1990, Massachusetts General Laws, Chapter 151B and all administrative and executive orders, where applicable.

The Colleges reserve the right to disqualify any contractor, person or entity seeking to provide services to a Community College that fails to adhere to the prohibitions against discrimination in employment that are contained in this section.

E. IMPLEMENTATION OF AFFIRMATIVE ACTION POLICY

The implementation of an effective affirmative action policy is ultimately the responsibility of the President of each Community College. The President will direct the Affirmative Action Officer to coordinate the overall development, administration and monitoring of all affirmative action programs, policies, procedures and regulations. The Affirmative Action Officer will report directly to the President, or their designee, and will bear responsibility for the preparation and execution of all affirmative action policies and programs.

Consistent with all collective bargaining and non-unit employee agreements, each supervisor will seek to ensure that affirmative action and equal opportunity are integrally tied to all aspects of any recruitment, hiring, training or advancement related decisions to which they are a party. They will be aware of goals and will consult with the Affirmative Action Officer prior to and in the course of such actions.

F. AFFIRMATIVE ACTION OFFICER AND TITLE IX COORDINATOR

See “Definition” Section of this Policy for Affirmative Action Officer and Title IX Coordinator contact information.

a. Affirmative Action Officer

The Affirmative Action Officer (“AAO”) shall have the task of infusing affirmative action into all aspects of the College. They shall be responsible for the development, administration and evaluation of affirmative action policies, procedures, programs and goals; serve as monitor of local, state and federal laws and regulations relating to affirmative action and equal opportunity and compliance thereof; and administer to all segments of the College - students and employees.

The AAO will analyze the College’s work force composition. The AAO may also analyze specific work areas or divisions within the College to determine if under-utilization of any protected group exists. The development of goals and timetables to correct any identified under-utilization shall be the responsibility of the AAO with input from the appropriate administrative officers. Although the basic responsibility for implementation of the affirmative action/equal opportunity program necessarily rests with the administrative officers of the College, the Affirmative Action Officer is responsible for providing advice and assistance.

The AAO shall be an ex-officio member of the Affirmative Action Committee and shall facilitate this Policy’s Complaint Procedures.

b. Title IX Coordinator

The College shall employ a Title IX Coordinator. The Title IX Coordinator may also serve as the College’s AAO. The College’s Title IX Coordinator has primary responsibility for coordinating the College’s efforts to comply with and carry out its responsibilities under Title IX, the Massachusetts Campus Sexual Violence Law of 2021, and the related policies of the College, which prohibit all Sex-Based Harassment in all College operations, as well as retaliation for the purpose of interfering with any right or privilege secured by Title IX or the Massachusetts Campus Sexual Violence Law. The Title IX Coordinator shall be adequately trained to perform their duties, including understanding the legal aspects of Title IX and the Massachusetts Campus Sexual Violence Law, conducting investigations of all Sex-Based Harassment, administering an investigative process that protects the safety of victims and promotes accountability and providing campus-wide training to members of the College community.

The Title IX Coordinator does not have an obligation to respond to any conduct or speech other than that which reasonably may constitute Sex-Based Harassment.

Members of the College community should contact the Title IX Coordinator in order to:

- Seek information or training about students’ and employees’ rights and courses of action available to resolve complaints that involve Sex-Based Harassment;
- File a complaint or make a report of a Sex-Based Harassment;
- Notify the College of an incident that may raise potential concerns related to Sex-Based Harassment;
- Provide information about available resources; and

- Periodically evaluate and review the College's policies and procedures related to Sex-Based Harassment.

The Title IX Coordinator's functions and responsibilities include:

- Monitor the College's education program or activity for barriers to reporting information about conduct that reasonably may constitute Sex-Based Harassment and take steps reasonably calculated to address such barriers;
- Coordinate efforts including the development, implementation, and monitoring of appropriate disclosures, policies, procedures and practices designed to comply with federal and state legislation, regulation, and case law requiring the prompt and equitable resolution of all complaints pursuant to Title IX, the MA Campus Sexual Violence Law, and related College policies;
- Provide leadership, direction and supervision for all activities and personnel related to the role, including consulting with relevant policy-making bodies and senior personnel for the purpose of advising, clarifying and identifying necessary action to eliminate Sex-Based Harassment in all educational programs and activities, to ensure that access to facilities, opportunities, and resources is gender equitable throughout the College;
- Provide ongoing training, consultation, and technical assistance for all students including: students' rights under Title IX, the MA Campus Sexual Violence Law, and related College policies, identifying behaviors that constitute Sex-Based Harassment; how to report Sex-Based Harassment; reporting options; understanding the College's Complaint Procedure and Complaint Processes; the potential consequences for violating College policies; the role of alcohol and/or drug use; amnesty; consent; the importance of seeking prompt medical attention; prohibition against retaliation; and Bystander Intervention training;
- Provide ongoing training, consultation, and technical assistance for all employees in areas including: how to identify and report Sex-Based Harassment; the College's responsibilities to address Sex-Based Harassment; recognizing warning signals; understanding their reporting obligations; information regarding confidential reporting options; information regarding confidential reporting options; and students' rights and remedies; and available student services.
- Develop, implement and coordinate campus and/or school-based strategic efforts aimed at the prevention of sexual assault and other forms of Sex-Based Harassment;
- Develop and disseminate educational materials, including brochures, posters, and web-based materials that inform members of the College community of rights, responsibilities and resources pursuant to Title IX, the MA Campus Sexual Violence Law, and related College policies, both within and external to the College;
- Oversee prompt, effective, and equitable intake, investigation, processing, and timely resolution of all Sex-Based Harassment matters made known to any employees and/or

reported or filed by students, faculty, employees, third parties, or by members of the broader community;

- Offer and coordinate supportive measures as appropriate for both the Complainant and Respondent;
- Notify the Complainant or, if the Complainant is unknown, the individual who reported the conduct and the Respondent of the complaint processes and the informal resolution process if available and appropriate;
- Provide appropriate notice of an investigation; determine the extent of an investigation; oversee investigation efforts; ensure provision of initial remedial actions; assure compliance with timelines; deliver appropriate notice of charge, notice of investigation, notice of outcome, duty to warn, and remedies, and provide a repository for and source of institutional record-keeping;
- Provide guidance and assistance to alleged victims of Prohibited Conduct, including referral to support resources, notice of right to file internal grievances, notice of the right to grieve to the US Department of Education Office for Civil Rights, and notice of the right to report incidents to law enforcement;
- Coordinate the College's notice to all applicants for admission and employment, students, parents or legal guardians of elementary and secondary school students, employees, and all unions, of the name or title, office address, electronic mail address, and telephone number of their designation as the Title IX Coordinator;
- Organize and maintain grievance files, disposition reports, and other records regarding Title IX compliance, including annual reports of the number and nature of filed complaints and the disposition of said complaints, data collection, climate assessment, pattern monitoring; and
- Serve as principal contact for government inquiries pursuant to Title IX, the Massachusetts Campus Sexual Violence Law, and related College policies.

G. DISSEMINATION OF POLICY

The Affirmative Action Policy will be widely distributed and discussed within the College Community. A copy of the Policy will be distributed to every major work area at each College and a copy will be maintained in the Library and the Affirmative Action Office. Copies of the Policy will be made available upon request to any student, employee, applicant for student status or for employment or member of the community. The Policy is available on the College's website and from the College's Affirmative Action Officer upon request. Colleges may implement procedures requiring employees to annually confirm their receipt of this Policy.

In accordance with state and federal requirements, the following notice will be included in all vacancy postings and other appropriate college publications, contracts, solicitations for bids, purchase orders, websites and leases:

_____ *Community College is an affirmative action/equal opportunity employer and does not discriminate on the basis of race, color, national origin, ethnicity, sex, disability, religion, age, veteran status, genetic information, pregnancy or related conditions, gender identity, sex characteristics, sex stereotypes or sexual orientation in its programs and activities as required by Title IX of the Educational Amendments of 1972, the Americans with Disabilities Act of 1990, Section 504 of the Rehabilitation Act of 1973, Title VII of the Civil Rights Act of 1964, and other applicable statutes and college policies. The College prohibits Sex-Based Harassment. Inquiries or complaints concerning discrimination, harassment, or retaliation shall be referred to the College's Affirmative Action Officer and/or Title IX Coordinator, the Massachusetts Commission Against Discrimination, the Equal Employment Opportunities Commission or the United States Department of Education's Office for Civil Rights.*

H. PLAN OF ACTION

a. Program Purpose and Intent

The Community Colleges are committed to a policy of equal opportunity and affirmative action. The purpose of this Policy is to establish programmatic objectives that will provide for the access and advancement of qualified minorities, women, and persons with disabilities with respect to both employment and education. The intent of this Policy is to acknowledge and responsibly alleviate the effects of societal discrimination and its impact on the protected group.

b. Scope

Affirmative action and equal opportunity shall be viewed as an integral part of the mission and purpose of each Community College. The Affirmative Action Policy by its very nature shall affect and apply to all aspects of recruitment, employment and education.

The opportunity for education for students in the protected classifications will be an imperative. Affirmative action programs should support not only student admissions to the College but also its programs.

In employment, affirmative action will affect recruitment, terms and conditions of employment, administrative procedures and relevant policies and practices of the College.

c. Workforce and Utilization Analysis

A procedure for implementation of the Policy will be undertaken and it will include opportunities for maximum communication between the responsible parties, i.e., supervisors, the Affirmative Action Officer and the President. A workforce and utilization analysis shall be conducted annually.

d. Under-Utilization

Under-utilization exists when the number of individuals in protected classifications in an occupational category is fewer than would reasonably be expected based upon the availability of qualified persons for employment within a specific geographic area. When under-utilization is identified for appropriate organizational units and occupational categories, goals and timetables are established as a means of increasing the employment of qualified individuals in protected classifications at the earliest possible time. This section shall be applied in a manner consistent with the appropriate collective bargaining agreement, if applicable.

e. Goals

Hiring goals are targets for increasing the employment of qualified individuals in protected classifications in appropriate organizational units and/or occupational categories of the College workforce. Hiring goals are not rigid quotas. They are reasonable estimates of what is attainable and are established separately for individuals in protected classifications.

Program goals include special efforts to remove barriers, to improve awareness or sensitivity, to address problem areas identified within the College Affirmative Action Policy, to bring about

conditions that will promote the hiring goals, or to address changes taking place within the institution. General timetables are to be established for the implementation of the goals. The time period shall normally be between two (2) and five (5) years.

f. Identification of Problem Areas and Remedial Approaches

At the request of the Commissioner, the President shall submit a report to the Commissioner as referenced in Auditing and Reporting and shall include an analysis of under-utilized areas and possible solutions and may cover such issues as curricular concerns, employment and student recruitment, hiring, retention of employees, resignations, and College activity and program availability. The report will also consider and give an analysis of the established goals and timetables.

g. Programmatic & Collaborative Efforts

The Community Colleges have, as a group, committed themselves to a policy of affirmative action/equal opportunity and non-discrimination throughout this Policy. The Colleges realize, however, that the development and implementation of specific programmatic efforts, both individually and collaboratively, will be essential to the establishment of an action oriented program. Rather than rendering affirmative action policies that merely represent a compilation of policies, procedures and prohibited practices solely designed to avoid discrimination, these action-oriented elements ensure that this Policy becomes a pro-active, aggressive tool as opposed to a passive document.

In an effort to fully establish joint collaborative programs that will enhance the implementation of the Community Colleges' Affirmative Action Policy, the Affirmative Action Officers of the fifteen institutions are encouraged to work collaboratively on the following initiatives.

- **Recruitment Directory**

A directory of recruitment resources may be developed for each major category of positions (i.e., academic discipline, administrative area, field of focus) listing the various known sources for contact. This directory will list individuals, departments, institutions, organizations, professional associations and their various caucuses that are known to be good sources of candidates from protected classifications. In addition, the directory will also contain a listing of major publications such as newspapers, journals or other periodicals that print job advertisements and have substantial circulation among individuals in protected classifications and other underrepresented persons or groups. Trade or professional journals for each academic discipline and professional area will also be included.

- **Program of Professional Enrichment for Personnel of Affirmative Action Offices**

The Affirmative Action Officers will meet regularly and jointly participate in workshops, seminars and other kinds of enrichment opportunities that will assist them in the performance of their duties. Insofar as possible, reliance will be placed on the expertise of persons within the public higher education system, local, state and federal agencies, and professional organizations and associations in order to keep costs to a minimum.

- **Educational Seminars**

The Affirmative Action Officers, collectively or individually, may develop seminars to strengthen the understanding and sensitivity of all employees, and in particular senior administrators and supervising managers, to the importance of their respective roles in fostering a workplace free of discrimination, harassment and retaliation. All members of the College community shall be encouraged to attend such programs.

h. Individual Campus Efforts

Specific programmatic efforts determined by the individual Colleges may take any of several forms: projects, programs, defined strategies, structured activities or other tactical steps that contribute to fulfillment of the Colleges' affirmative action and equal opportunity goals and objectives. Each College may develop specific programs to assist in identifying and overcoming deficiencies, increasing representation of qualified individuals in protected classifications within the work force and the student body and providing increased opportunities for under-represented groups, both in the area of employment and in the area of the student learning environment. Cross-cultural programming, sensitization of all members of the College communities to the rights and needs of all persons, including individuals in protected classifications will play a major part. The involvement of all segments of the College community in both the planning and the implementation of such programming will be an essential factor in its success.

I. HIRING GUIDELINES

Proper hiring guidelines are crucial to the success of attracting and hiring a qualified, diverse workforce. The Human Resources Office shall work in consultation with the Affirmative Action Officer in developing proper hiring guidelines. The hiring process is generally initiated with the development of a recruitment plan, which shall be reviewed by the Affirmative Action Officer before commencing with advertisement. The plan will be reviewed in light of the College's affirmative action goals and will include the use of applicable mailing lists of contacts and resume file, if any, developed and maintained for affirmative action recruiting. Goals will be reviewed at the time of recruitment.

When practicable, the time permitted between the initial public announcement of an available position and the deadline for submission of applications must allow for adequate selective notification of qualified individuals in protected classifications.

For vacancies for positions that are half-time or greater, the Affirmative Action Officer will consult with the hiring manager to determine an appropriate recruitment time frame which will allow sufficient time to recruit under-utilized persons while simultaneously meeting the organization's need to fill the position as soon as possible.

Deans and Vice Presidents are encouraged to plan ahead and schedule all searches so as to allow sufficient time to conduct effective affirmative action searches.

If the recruitment process fails to yield sufficient numbers of qualified candidates from a designated protected group, consideration may be given to reposting the position. This section shall be applied in a manner consistent with the appropriate collective bargaining agreement, if applicable.

The Affirmative Action Officer shall have access to all applications for the purpose of reviewing and certifying the process and the outcome and for the purpose of collecting data to conduct applicant flow studies, etc. Additionally, the Affirmative Action Officer may make recommendations for interviewing affirmative action candidates.

The hiring process will generally include an interview with a search committee, which may include the position's direct supervisor and/or other appropriate persons who have responsibility in the work area. The Affirmative Action Officer will review a committee's recommendation for appointment and sign it to verify compliance with affirmative action procedures. If the Affirmative Action Officer finds that the recruitment and/or selection process does not satisfy affirmative action requirements, they should submit their reservations to the President.

In regard to hiring/promotions, the College will comply with all applicable collective bargaining provisions when making such decisions.

J. COLLEGE AFFIRMATIVE ACTION COMMITTEE

An Affirmative Action Committee shall be established consisting of at least seven (7) members representative of faculty, administrators, non-teaching professionals, classified staff and students. The Committee shall include protected classification representation. The members shall be appointed by the President. The Affirmative Action Officer shall be an ex-officio member of the Committee.

The Committee shall act as a policy advisory body to the President in all matters concerning affirmative action, equal opportunity, and diversity. Specific responsibilities of the Committee may include, but are not limited to, the following:

- a. Advise and assist the President and the Affirmative Action Officer in developing, implementing and evaluating the College's Affirmative Action Program;
- b. Recommend changes in the programs or policies;
- c. Represent the concerns of all employment areas of the College as these concerns relate to equal opportunity;
- d. Be informed about the rules and procedures of the College as well as federal and state laws and regulations governing affirmative action and equal opportunity;
- e. Meet as necessary, but not fewer than two (2) times a year; and
- f. Help sensitize and educate the College community regarding the affirmative action issues facing higher education and the larger society and to help broaden understanding of diversity in our society as well as to encourage behaviors appropriate to a pluralistic society.

K. AUDITING AND REPORTING

The Affirmative Action Officer shall be primarily responsible for monitoring compliance and auditing the implementation of the Policy on Affirmative Action, Equal Opportunity and Diversity. The Affirmative Action Officer shall furnish the President with progress reports and shall inform the President of practices or policies that may not be in compliance with the Policy.

The Affirmative Action Officer will annually review the progress being made toward achievement of the College's affirmative action goals. The review shall include strategies and timetables for achieving its affirmative action goals, availability figures, institutional performance or other circumstances that affect the implementation of this Policy's goals. In addition, they will assure that annual compliance reports required by the Board of Higher Education and other state and federal agencies are completed.

To ensure compliance with this Policy, the Affirmative Action Officer will review and evaluate the applicable policies, programs and activities related to job requirements, performance criteria, personnel benefit plans, students support services, facilities and programmatic access, vendor contract submission and services, media advertising and public relations materials, including all College publications. Recruitment and hiring procedures will be monitored using the methods described in this Policy. All monitoring and analyses will be conducted as necessary to identify problem areas and provide recommendations to remedy them.

The Affirmative Action Officer shall conduct periodic audits of the utilization analysis and goals. The purpose of the audit will be to assess progress toward established goals and to apprise other persons responsible for recruitment of the findings. Continuous monitoring is important to the success of the Policy. The findings, while utilized throughout the year, will be reported formally in the annual report. Problem areas and successes will be reported. Additionally, compliance reports requested by other agencies should be included as an internal audit mechanism.

L. COMPLAINT PROCEDURES

I. General Information For All Complaints

a. Application of Policy

The complaint procedure listed below is intended to provide a mechanism to investigate and where possible resolve complaints of alleged violations of this Policy against employees and students. The procedure is intended to ensure that the College will conduct an impartial, fair, effective, and efficient investigation of all allegations of violations of this Policy without fear of retaliation. The complaint procedure is available to any employee or student, or applicant for employment or admission, or a person other than a student or employee, who believes they have been subjected to Prohibited Conduct as defined under this Policy. A complaint filed in another forum does not preclude an individual from filing a complaint under this Policy. Further, a complaint filed in another forum, including a criminal or civil complaint, shall not delay an investigation of a complaint filed under this Policy.

b. Confidentiality of Process

The complaint procedure will be conducted as confidentially as reasonably possible to protect the privacy rights of all individuals involved. The College may share information concerning the complaint with parties, advisors, witnesses and/or others during any phase of the procedure on a need-to-know basis and shall share information with union representatives as provided for in M.G.L. c.150E. All individuals with whom information is shared shall be advised of the confidential nature of the information and directed not to discuss the matter with anyone other than an advisor, if applicable.

c. Complainant Requests No Action and/or Confidentiality

Where a Complainant requests that no action be taken by the College or requests that their identity not be revealed, the College shall take reasonable steps to investigate and respond to the complaint, but shall inform the Complainant that such a request may hamper its ability to fully investigate an alleged violation of this Policy and/or to take appropriate remedial steps, including disciplinary action. Where an allegation of Prohibited Conduct involves the potential of an ongoing threat to the health, safety or security of members of the College community or a potential adverse employment action, the Affirmative Action Officer, or in the case of an allegation of Sex-Based Harassment, the Title IX Coordinator, shall inform the Complainant that it cannot ensure confidentiality and disclosure of their name may likely be required.

d. Off Campus Behavior

The College will investigate alleged Prohibited Conduct under this Policy which occurs in the College's education program or activity off-campus when such conduct adversely affects the College Community, poses a threat to the College Community; interferes with the College's pursuit of its educational objectives and mission, and/or if a student or employee is charged with a serious violation of state or federal law.

Conduct that occurs under the College's education program or activity includes but is not limited to locations, events, or circumstances over which the College has substantial control and for which such conduct is subject to the College's disciplinary authority. This also includes conduct that takes place via school-operated electronic devices, computer and internet networks and digital platforms operated by, or used in the operations of the College, including AI technologies; and conduct that occurs during training programs sponsored by a college at another location.

If Sex-Based Harassment is alleged to have occurred outside the College's education program or activity in the United States, but has created a hostile environment that impacts the College's programs, activities or community in the United States, that conduct will be subject to investigation.

e. Supportive Measures

This Policy requires the College to take non-disciplinary/non-punitive reasonable steps to preserve or restore equal access to its education programs and activities and protect individuals from Prohibited Conduct, including offering supportive measures to a Complainant before the final outcome of an investigation, irrespective of whether complaint processes are initiated. Supportive measures will be offered to a Respondent, as appropriate, if complaint processes have been initiated or an informal resolution process has been offered.

Supportive measures are designed to restore or preserve equal access to the College's education program or activity without unreasonably burdening the other party, including measures designed to protect the safety of all parties or the College's educational environment, provide support during the College's complaint process or during the informal resolution process, or deter all forms of Prohibited Conduct. The College shall take these steps promptly once it has notice of an allegation of Prohibited Conduct.

Examples of supportive measures include, but are not limited to, the following:

- Counseling;
- Extensions of deadlines or other course-related adjustments (for example: changing class schedule, withdrawal without penalty, providing student services such as tutoring, alternate class completion options);
- Modifications of work schedules or job assignments;
- Campus escort services;
- Increased security and monitoring of certain areas of the campus;
- Restrictions on contact applied to one or more parties;
- Changes in class, extracurricular, or any other activity, regardless of whether there is or is not a comparable alternative;
- Leaves of absence;
- Training and education programs related to Sex-Based Harassment; and
- Other similar measures.

The specific supportive measures implemented and the process for implementing those measures will vary depending on the facts of each case. The College will consider a number of factors in determining what supportive measures to take, including, for example, the specific needs

expressed by each party; the severity or pervasiveness of the allegations; any continuing effects on each party; whether the parties share the same classes, schedules, transportation, or job location; and whether other judicial measures have been taken to protect the victim (*e.g.*, civil or criminal protection orders).

The College provides an opportunity to either party to seek modification or reversal of any decision to provide, deny, modify, or terminate supportive measures applicable to them. Challenges to supportive measures could include, but are not limited to: challenges concerning whether a supportive measure is reasonably burdensome, whether a supportive measure is reasonably available, whether the supportive measure is being imposed for punitive or disciplinary reasons, whether the supportive measure is being imposed without fee or charge, and whether the supportive measure is effective in meeting the purposes for which it is intended. Such challenges must be made, in writing, to an Impartial Employee within ten (10) days and include: (1) the supportive measure being challenged; (2) the reason for the challenge; and (3) the action sought by the party (*e.g.*, to provide, deny, modify, or terminate the supportive measure).

A party may seek modification or termination of a supportive measure applicable to them if circumstances change materially. Whether or not circumstances have changed materially is a fact-based consideration depending on the particular context of the Complainant and Respondent. In general, when taking supportive measures, the College shall minimize the burden on each party. The College must maintain as confidential any supportive measures provided to the parties, to the extent that maintaining such confidentiality would not impair the ability of the College to provide the supportive measures or restore or preserve a party's access to the education program or activity.

f. Interim Action and Emergency Removal

The College reserves the right to suspend a student on an interim basis or place an employee on paid administrative leave prior to completing an investigation under this Policy when it reasonably concludes that a student or employee: (a) poses a threat to health or safety; (b) poses a threat to College property or equipment; (c) is disruptive or interferes with the normal operations of the College; or (d) is charged with a serious violation of state or federal law. In such cases, the College shall provide the employee or student of the specific reason(s) for the interim action. During a student's interim suspension or an employee's leave, the College reserves the right to prohibit the individual from entering upon the College's property or participating in any College activities absent written authorization from an appropriate official of the College.

In the case of a Sex-Based Harassment claim, the College must base its decision to institute interim action (*i.e.*, emergency removal) on the following factors: (1) It undertakes an individualized safety and risk analysis, (2) determines that an immediate threat to the physical health or safety of any student or other individual arising from the allegations of Sex-Based Harassment justifies removal, and (3) provides the Respondent with notice and an opportunity to challenge the decision immediately following the removal. A Respondent subject to emergency removal from the Title IX Coordinator may appeal the decision per the Appeal procedure below in Step 3 of the Complaint Process.

The College shall make reasonable efforts to minimize disruption in the professional or educational experience of all affected parties. The College, Complainant, and Respondent will take reasonable

efforts to preserve all relevant materials to a complaint, including communications (e.g. email and voice) and documents.

g. Joint Investigation

In some circumstances a Responding Party's conduct may constitute a potential violation of this Policy and/or other conduct policies applicable to employees or students. In such cases, in order to avoid duplicative investigatory efforts, a joint investigation under this Policy may be conducted by the AAO or, in the case of an alleged Sex-Based Harassment, the Title IX Coordinator, and the administrator charged with enforcing conduct policies. For example, if the Responding Party is a student, the Affirmative Action Officer (or Title IX Coordinator if Sex-Based Harassment is alleged) and Student Code of Conduct Administrator may jointly investigate the complaint. Based on the findings of their joint investigation, the student may be subject to disciplinary action for violations of this Policy and/or the Student Code of Conduct. Where the Responding Party is an employee, a joint investigation may be conducted by the Affirmative Action Officer (or Title IX Coordinator if Sex-Based Harassment is alleged), Human Resources and the employee's supervisor. Based on the findings of their joint investigation, the employee may be subject to disciplinary action for violations of this Policy and/or for inappropriate and unprofessional conduct.

h. Collateral Rights of Employees

Any disciplinary action taken against an employee shall be regarded as an administrative action subject to all terms and conditions of applicable collective bargaining agreements.

i. Anonymous Report

Any individual may file an anonymous report concerning any Prohibited Conduct referenced under this Policy. An individual may report the incident without disclosing their name, identifying the Respondent or requesting any action. An anonymous report may be filed with the Affirmative Action Officer or, in the case of an allegation of Sex-Based Harassment, the Title IX Coordinator. Non-Confidential Employees may not maintain the anonymity of the reporting party when they receive a complaint and are required to share this information with the Title IX Coordinator. Depending on the level of information available about the incident or the individuals involved, however, the College's ability to respond to an anonymous report appropriately and effectively may be limited (e.g. offering supportive measures to a Complainant of Sex-Based Harassment).

j. Amnesty

Students may be hesitant to report Sex-Based Harassment out of concern that they, or witnesses, might be charged with violations of the College's drug/alcohol policies. While the College does not condone such behavior, it places a priority on addressing allegations of Sex-Based Harassment. Accordingly, the College may elect not to pursue discipline against a student who, in good faith, reports, witnesses or possesses personal knowledge of an incident of Sex-Based Harassment.

k. Knowingly Making a False Complaint

Knowingly making a false complaint under this Policy is a serious offense. If an investigation reveals that Complainant knowingly made a false complaint, the College shall take appropriate actions and issue sanctions pursuant to other applicable College policies, including any applicable collective bargaining agreement. The imposition of such sanctions does not constitute retaliation under this Policy. A report made in good faith, however, is not considered false merely because the evidence does not ultimately support the allegation of Prohibited Conduct.

l. Dismissal of Complaints

By simultaneous written notice to the parties, the Affirmative Action Officer or Title IX Coordinator *may* dismiss any Complaint with regard to that conduct, if:

- Complainant withdraws the Complaint or any or all of the allegations in writing;
- Respondent is no longer enrolled or employed by the College;
- The College is unable to identify the Responding Party after taking reasonable steps to do so; or
- The conduct alleged would not constitute Prohibited Conduct as defined, even if proven.

After dismissal, the Affirmative Action Officer/Title IX Coordinator will offer appropriate supportive measures to Complainant and to Respondent, if Respondent was notified of the allegations prior to dismissal.

This decision to dismiss the complaint may be appealed consistent with the appeal procedure in Step 3 below.

m. Informal Resolution Procedures

At any time prior to determining whether the alleged conduct occurred, the College may offer to Complainant and Respondent an informal resolution process. Such an offer will be made to both parties in writing and will include an outline of each party's rights and responsibilities in the informal resolution process. The College has discretion to determine whether it is appropriate to offer an informal resolution process when it receives information about conduct that reasonably may constitute Sex-Based Harassment, when a complaint of Sex-Based Harassment is made, or when the alleged conduct would present a future risk of harm to others and may decline to offer informal resolution despite one or more of the parties' wishes.

The College must obtain the parties' voluntary consent to the informal resolution process and does not require waiver of the right to an investigation and determination of a complaint as a condition of enrollment, continued enrollment, employment, continued employment or exercise of any other right. Before the initiation of the informal resolution process, the College must provide to the parties notice that explains: (1) the allegations; (2) the requirements of the informal resolution process; (3) that, prior to agreeing to a resolution, any party has the right to withdraw from the informal resolution process and to initiate or resume the College's complaint processes; (4) that the parties' agreement to a resolution at the conclusion of the informal resolution process would preclude the parties from initiating or resuming complaint processes arising from the same allegations; (5) the potential terms that may be requested or offered in an informal resolution agreement, including notice that an informal resolution agreement is binding only on the parties;

and (6) what information the College will maintain and whether and how the College could disclose such information for use in complaint processes if complaint processes are initiated or resumed.

An informal resolution is achieved through open or closed dialogue between the parties that allows for the airing of any misunderstandings or disputed issues. During the informal resolution process, Respondent may accept responsibility or accountability for the alleged behavior or harm caused. Potential terms in an informal resolution agreement may include but are not limited to:

- Restrictions on contact; and
- Restrictions on the Respondent's participation in one or more of the College's programs or activities or attendance at specific events, including restrictions the College could have imposed as remedies or disciplinary sanctions had the College determined at the conclusion of the complaint processes that the alleged conduct occurred.

If the parties accept the informal resolution, its terms shall be reduced to writing, signed by both parties, and the Affirmative Action Officer or Title IX Coordinator shall retain the document, with copies to the parties; thereafter, the matter shall be considered resolved between the parties. In the case where Respondent is an employee, prior to execution of a resolution, they will be notified that a copy of the informal resolution may be placed in their personnel file. The parties may request from the College that an informal resolution not be placed in Respondent's personnel file; however, the College retains the sole discretion to approve or to deny this request. In cases where such request is denied, each party reserves their right to withdraw from the informal resolution process and resume the complaint process. All other documents related to the informal resolution of a Complaint shall be kept separate from the personnel file. Further, at no time shall a Responding Party question or confront a Complainant, or engage a third party to do so, as such conduct may constitute retaliation, which are strictly prohibited under this Policy.

II. Complaint Process

The following rules apply throughout all phases of the complaint process: (1) all parties to a complaint may have an advisor; (2) the role of an advisor is limited to providing discrete advice and counsel to the party; (3) the filing of a complaint under this Policy shall not preclude a Complainant from pursuing a complaint in a separate legal forum; (4) a grade dispute based on alleged Prohibited Conduct shall proceed under this Policy and not the Grade Appeal Process contained in the Student Grievance process; and (5) all findings reached under this Complaint Procedure must be based on a "preponderance of evidence" (i.e.; more likely than not) standard.

At any point during the complaint process, either party may request mediation by contacting the Affirmative Action Officer or Title IX Officer. The purpose of mediation is to resolve the dispute to the satisfaction of both parties. If mutually agreed upon by the parties, mediation shall be conducted as follows:

a. Prohibited Conduct (Excluding Sex-Based Harassment)

The Affirmative Action Officer has the authority to seek to resolve the complaint through mediation (i.e. an administrative remedy), and may serve as the mediator. Where practicable, a mediation session shall be conducted no later than thirty (30) days

after agreed to by the parties. The timelines presented under the Complaint Procedure shall be tolled pending the outcome of mediation.

b. Sex-Based Harassment

The informal resolution process (i.e. mediation) will not be facilitated by the Title IX Coordinator or decision maker in the College's complaint processes, but by an impartial mediator. The impartial mediator shall inform the parties in writing of the mediation process and schedule. The impartial mediator must have training or experience in mediating matters subject to this complaint process. Where practicable, a mediation session shall be conducted no later than thirty (30) days after agreed to by the parties. The timelines presented under the Complaint Procedure shall be tolled pending the outcome of mediation.

If mediation is successful in resolving the complaint, the mediator shall reduce to writing the terms of the mediated resolution, which shall be signed by the parties. If mediation does not result in a resolution, all mediation discussions shall remain confidential and may not be used or introduced in this process or any other forum.

Step 1 – Investigation

When a Complainant believes that they have been subjected to Prohibited Conduct, the Complainant may make a complaint with the Affirmative Action Officer or Title IX Coordinator.

- a. Prohibited Conduct: The complaint shall contain a statement of all known facts pertaining to the alleged violation and shall be filed preferably on the Discrimination Complaint Form (see Appendix A). Verbal complaints shall be reduced to writing by the Affirmative Action Officer or Title IX Coordinator, and reviewed and signed by the Complainant within ten (10) days. If a student is involved, the Affirmative Action Officer or Title IX Coordinator shall notify the Vice President of Student Affairs or Dean of Student Services. If an employee is involved, the Affirmative Action Officer or Title IX Coordinator shall notify Human Resources.
- b. Evidence: The Affirmative Action Officer or Title IX Coordinator will request that Complainant provide any and all evidence in their possession, custody or control that support the allegations raised in their complaint.

There may be circumstances where a complaint is dismissed prior to a Respondent being notified as outlined in Section L(I)(l) of this Policy.

The Affirmative Action Officer or Title IX Coordinator will notify the Responding Party in writing within fourteen (14) days of their determination that the complaint is to be investigated rather than dismissed and provide the Responding Party with a copy thereof (see Appendix B). The timeliness of such notification shall be in accordance with the appropriate collective bargaining agreement, if applicable. The Responding Party shall have ten (10) days from receipt of notice to submit to the Affirmative Action Officer or Title IX Coordinator a written response to the complaint.

Where practicable, within thirty (30) days from the date the Respondent's written response is received, or the date it was due if none was submitted, the Affirmative Action Officer or Title IX

Coordinator shall conduct an investigation, review all evidence gathered through the investigation and determine what evidence is impermissible regardless of relevance, and provide each party with and a written description of the evidence that is relevant to the allegations of Prohibited Conduct and not otherwise impermissible.

After determinations are made on the evidence to date, the Affirmative Action Officer or Title IX Coordinator will schedule recorded meetings with the parties and witnesses (if applicable). The parties are permitted one advisor of their choice, who may but is not required to, be an attorney (for union employees this may be a union representative), who may be present in any meeting or proceeding prescribed by this Policy, and who may inspect and review evidence. The advisor's role is strictly limited to providing direct assistance to the party that they advise for the purposes of the complaint processes.

The Affirmative Action Officer or Title IX Coordinator will:

- a. Provide to a party and their advisor, whose participation is invited or expected, written notice of the date, time, location, participants, and purpose of all meetings or proceedings with sufficient time to prepare to participate;
- b. Allow each party to propose questions for the Affirmative Action Officer or Title IX Coordinator to ask during individual meetings with the other party and witness(es); and
- c. Provide an audio or video recording or transcript of the individual meetings with the other party and witness(es) with a reasonable time as determined by the investigator for the party to propose additional follow up questions. In no event shall follow up questions be submitted more than ten (10) days after receipt of the audio or video recording or transcript.

When questioning parties and witnesses, the Affirmative Action Officer or Title IX Coordinator:

- a. Will determine when a proposed question is relevant and not otherwise impermissible and, if a question is excluded, explain why;
- b. Will prohibit questions that are unclear or harassing of the party being questioned, though the party will be given an opportunity to revise such questions;
- c. May impose other equally applicable rules regarding decorum; and
- d. May choose to place less or no weight on statements made by parties or witnesses who refuse to respond to questions. However, in a Sex-Based Harassment complaint, they will not draw any inferences about whether sexual harassment occurred based on a refusal to respond to questions.

After questioning of the parties and witnesses has concluded, the Affirmative Action Officer or Title IX Coordinator shall issue a Report of Preliminary Findings which shall specify the investigation undertaken, including a written description of the evidence, and summarize their preliminary findings. There are no recommendations at this stage as the findings are not final. The preliminary report shall be delivered to the parties in hand, by certified mail or at their College-issued email address (if applicable). Upon request, each party will have an equal opportunity to access the evidence. If the investigation is not completed within thirty (30) days, status updates shall be provided to the parties every thirty (30) days until it is completed. Any request by a party to extend a deadline established under this procedure shall be presented in writing to the Affirmative Action Officer or Title IX Coordinator.

Thereafter, the parties will have ten (10) days from the date of their receipt of the Report of Preliminary Findings to submit Rebuttal Statements to the Affirmative Action Officer or Title IX Coordinator. The parties may present no new allegations at that time. Where practicable, within ten (10) days of receiving the parties' Rebuttal Statements, the Affirmative Action Officer or Title IX Coordinator shall review the Rebuttal Statements and prepare and submit a Report of Final Findings and Recommendations to the Designated Decision-Maker for consideration.

Step 2 – Review and Decision by the Designated Decision-Maker

Where practicable, within ten (10) days of receipt of the Report of Final Findings and Recommendations, the Designated Decision-Maker shall issue a written decision to the parties. The written decision shall accept, reject or modify the Report of Final Findings and Recommendations. The Designated Decision-Maker's written decision shall be delivered in hand, by certified mail or at their College-issued email address (if applicable), and shall include the Report of Final Findings and Recommendations. If the President is the Responding Party, then the Chair of the College's Board of Trustees shall designate a Board member(s) as Designated Decision-Maker to administer Step 2 of the Complaint Process.

If there is a determination that a violation occurred, as appropriate, the Designated Decision-Maker shall require the Affirmative Action Officer or Title IX Coordinator to coordinate the provision and implementation of remedies to Complainant and other persons identified as having had equal access to the College's education program, activity or workplace limited or denied, coordinate the imposition of any disciplinary sanctions on a Respondent, including notification to Complainant of any such disciplinary sanctions, and require the Affirmative Action Officer or Title IX Coordinator to take other appropriate prompt and effective steps to ensure that discrimination does not continue or recur within the College's education program, activity or workplace.

Step 3 – Appeal to President

A party may file an appeal with the President within ten (10) days of receiving the designated decision maker's decision. A party may appeal for the following reasons only:

- a. Procedural irregularity that would change the outcome;
- b. New evidence that would change the outcome and that was not reasonably available when the determination of whether a violation occurred or dismissal was made; and/or
- c. The Title IX Coordinator, investigator, or decision maker had a conflict of interest or bias for or against complainants or respondents generally or the individual Complainant or Respondent that would change the outcome.

Where practicable, within ten (10) days of receiving the appeal, the President shall issue a written decision accepting, rejecting or modifying the designated decision maker's decision. The

President's decision is final provided that any corrective action and/or discipline imposed are subject to applicable collective bargaining agreements.

If the President is the Responding Party, then the Chair of the College's Board of Trustees shall consider the appeal and issue the written decision.

APPENDIX A - DISCRIMINATION COMPLAINT FORM

DISCRIMINATION COMPLAINT FORM

The purpose of this form is to record information required to initiate an investigation into an alleged violation of the College's Policy on Affirmative Action (PAA). All reasonable efforts will be made to maintain the confidentiality of the parties involved during the complaint procedure in accordance with the PAA.

Retaliation against a student, employee or any other person in the College for filing a complaint or for cooperating in an investigation of a complaint is strictly prohibited. All parties to a complaint may have an advisor (for union employees this may be a union representative) assist them throughout the process.

Date Filed: _____ Date(s) of Alleged Discrimination: _____

A. Name (Print): _____

B. Check One: Student: _____ Employee: _____ Other: _____

Program/Department: _____

C. Type of Prohibited Conduct (please check applicable category(ies)):

____ Discrimination ____ Retaliation
____ Discriminatory Harassment ____ Sex-Based Harassment

D. Type of alleged discrimination or harassment (please check applicable category(ies)):

Protected Classes:

____ Race/Color
____ National Origin
____ Age
____ Disability
____ Genetic Information
____ Religion/Creed
____ Veteran Status

Sex-Based Harassment:

____ Pregnancy or Related Conditions
____ Sex
____ Gender Identity
____ Sexual Orientation
____ Sex Characteristics
____ Sex Stereotypes
____ Other Sex-Based Claim (☐ *quid pro quo* harassment,
☐ hostile environment harassment, ☐ sexual assault,
☐ dating violence, ☐ domestic violence, ☐ stalking)

Other: _____

*Please see the PAA for definitions of above terms

E. Name of individual(s) you believe discriminated against you: _____

F. List any witnesses: _____

G. Description of Complaint - please list the sequence of events, including dates, if possible, and any relevant facts and statements to support your complaint of discrimination:

(If additional writing space is needed, please attach additional sheets) **To the best of my knowledge and belief, the above information is complete, true and accurate and not a “false complaint” as defined under this Policy. I hereby submit this complaint under the College’s Complaint Procedure.**

Signature of Complainant and Date

Received by (College Official’s name/title): _____

Date Received: _____

Date of Dismissal (Screen Out)/No Dismissal (Screen In) Determination: _____

APPENDIX B - NOTICE TO RESPONDENT

College Letterhead

To: _____, Responding Party

Cc: _____, Complainant

From: _____, (Title of College Official)

Subject: Discrimination Complaint

Date: _____

This is to notify you that on _____ a complaint alleging a violation of the College's Policy on Affirmative Action (PAA) was filed against you. A copy of the complaint is attached, as is a copy of the complaint procedure. You have ten (10) days from your receipt of this notice, to submit to me a written response to the complaint.

The Policy on Affirmative Action prohibits knowingly making false statements or knowingly submitting false information during the complaint procedure.

You will be contacted to schedule an appointment to discuss this matter. Retaliation against a student, employee or any other person for filing a complaint or for cooperating in an investigation related thereto is strictly prohibited.

Please note that you may have an advisor of your choice, and that the advisor may, but is not required to be, an attorney or union representative (if applicable).

Please be advised that you are presumed not responsible for the alleged conduct until a determination is made at the conclusion of this process, and that prior to any determination, you and your advisor will have an opportunity to present relevant and not otherwise impermissible evidence. You and your advisor are also entitled to any investigative reports and a description of the evidence. Upon request, you and your advisor will have an opportunity to access the relevant and not otherwise impermissible evidence.

All reasonable efforts will be made to maintain confidentiality during the complaint procedure in accordance with the Policy on Affirmative Action. Further, if any disciplinary sanctions are imposed as a result of an investigation under this Policy, all such sanctions shall be regarded as an administrative action subject to all terms and conditions of applicable collective bargaining agreements (if applicable).

All questions concerning this matter should be addressed to the College official referenced above.

SEX OFFENSES POLICY STATEMENT AND EDUCATIONAL PROGRAMS TO PREVENT RAPE, DOMESTIC VIOLENCE, DATING VIOLENCE, SEXUAL ASSAULT, AND STALKING

Quinsigamond values the health and safety of every individual on campus and expects its community members to treat other persons with respect and dignity. Quinsigamond prohibits domestic violence, dating violence, sexual assault and stalking. Quinsigamond recognizes the critical need to develop policies and programs that support victims/survivors and encourages them to report sexual assaults and rape (forcible and non-forcible) to the College staff. The College is committed to providing a working and learning environment that is free from all forms of abuse, harassment or coercive conduct and to offering the **educational programs** designed to meet these goals. The College presents the following programs.

As part of our comprehensive sexual violence prevention program, Quinsigamond Community College (QCC) expects all students to complete **Sexual Harassment Prevention Training**, from **Vector LMS** an online program that addresses the critical issues of sexual assault, harassment, relationship violence and stalking in our culture and on our campus. This program represents our commitment to help students work together to create a safe, inclusive and empowering campus community. All **QCC** students are being asked to complete **Vector LMS**. We recognize that every student has a unique set of personal experiences. This program will help you better understand the scope and impact of these important topics while introducing you to national, local and campus wide resources and policies that exist to help protect and support you as a student at QCC.

The program is available online and takes approximately 45 minutes to complete. You can finish the program all at once or in shorter installments – saving your progress as you go. **Your participation in this program is mandatory and will help the College comply with Federal guidelines.**

Before you begin Haven, please review QCC's policy below, which outlines our expectations of appropriate conduct towards other students by visiting the Student Handbook at: www.QCC.edu/handbook

If you have any questions about school policies, procedures, or support resources related to dating violence, domestic violence, sexual assault, and stalking, please contact Shannon Overcash – Associate Director of Compliance/Title IX Coordinator at sovercash@qcc.mass.edu and/or 508.854.2791.

- It's on us to stop sexual assault. Take the pledge to be part of the solution and find additional campus support materials at ITSONUS.ORG
- Educational Programs promoting awareness such as bystander training
- Procedures Community members should follow if a sex offense occurs
- Procedures on who should be contacted
- Evidence preservation
- Options regarding notification of campus and local law enforcement authorities
- Notification to students of existing on and off campus counseling, and other services for victims of sex offenses.
- Academic options/changes
- Procedures for campus disciplinary action
- Disciplinary Sanctions

The College supports bystander education as described below:

The following is a six step schema in its bystander training, "Gut Check," to better prepare men to intervene:

STEP ONE: Notice Events. Social norms often reinforce the normality of sexism and sexual assault so that they escape notice. Therefore, the first step is to notice when someone is crossing a line.

STEP TWO: Identify Events as Problems. If we understand the potential impact that a sexual assault can have on a survivor and the survivor's friends, family, and co-workers, we will see someone crossing the line as a problem requiring action.

STEP THREE: Feel Motivated to and Capable of Finding a Solution. Many times men feel stuck in situations where they might intervene.

Providing them with frameworks like primary prevention, dominant/counter stories of masculinity, and bystander intervention can motivate them to become unstuck.

STEP FOUR: Acquire Skills for Action. This key step underlines the necessity in helping men to develop strategies leading to effective action. MCSR works with men to develop an intervention toolkit.

STEP FIVE: Act. The first four steps are very important, but they only have an effect if an emphasis is placed on action. Men need to remember and use the strategies in the toolkit.

STEP SIX: Evaluate and Revise. After having intervened, men should consider what worked well, what did not, and what they might do differently the next time an opportunity arises.

WARNING SIGNS OF AN ABUSIVE PERSON:

This is a list of behaviors that are seen in people who abuse their partners. The first four behaviors (past abuse, threats of violence, breaking objects and any force during an argument) are almost always seen in an abusive person. If someone exhibits more than three of any of these warning signs, there is a strong potential for abuse in the relationship. An abuser may exhibit only a few of these behaviors, but they may be quite exaggerated.

Past abuse

An abuser may say, "I hit someone in the past, but she made me do it." An abusive person who minimizes what happened with a previous partner is likely to be violent with their current partner. Abusive behavior does not just go away; long-term counseling and a sincere desire to change are necessary.

Threats of violence or abuse

Threats can involve anything that is meant to control the victim. For example, "I'll tell your parents about your drug use if you don't do what I want." Healthy relationships do not involve threats, but an abusive person will try to excuse this behavior by saying that "everybody talks like that."

Breaking objects

An abuser may break things, beat on tables or walls or throw objects around or near the victim. This behavior terrorizes the victim and can send the message that physical abuse is the next step.

Use of force during an argument

An abuser may use force during arguments, including holding the victim down, physically restraining the victim from leaving the room, and pushing and shoving. For example, an abuser may hold a victim against the wall and say, "You're going to listen to me."

Jealousy

An abuser will say that jealousy is a sign of love. In reality, jealousy has nothing to do with love. It is a sign of insecurity and possessiveness. An abuser may question the victim about whom they talk to or be jealous of time spent with other people. As the jealousy progresses, the abuser will call the victim frequently, stop by unexpectedly or monitor the victim's activities.

Controlling behavior

An abuser will claim that controlling behavior is out of concern for the victim's welfare. They will be angry if the victim is late and will frequently interrogate the victim. As this behavior gets worse, the abuser will control the victim's appearance and activities.

Quick involvement

An abuser will often pressure someone to make a commitment after a very short amount of time. The abuser comes on quickly, claiming "love at first sight," and will tell the victim flattering things such as "You're the only person I could ever love."

Unrealistic expectations

The abuser is dependent on the victim for everything and expects perfection. The victim is expected to take care of everything for the abuser, particularly all emotional support. The abuser will say things like, "You're the only person I need in my life."

Isolation

The abuser will attempt to diminish and destroy the victim's support system. If a female victim has male friends, she is accused of being a "whore." If she has female friends, she is accused of being a "lesbian." If she is close to her family, she is accused of being "tied to the apron strings." The abuser will accuse people who are close to the victim of "causing trouble."

Blames others for problems

Abusers will rarely admit to the part they play in causing a problem. She will blame the victim for almost anything that goes wrong.

Blames others for their feelings

An abuser will tell the victim, "I hurt you because you made me mad," or "You're hurting me when you don't do what I ask." Blaming the victim is a way of manipulating them and avoiding any responsibility.

Hypersensitivity

An abuser can be easily insulted. The slightest setbacks are seen as personal attacks. An abuser will rage about the everyday difficulties of life as if they are injustices -- such as getting a traffic ticket or not doing well on an exam.

Cruelty to animals or children

An abuser may brutally punish animals or be insensitive to their pain or suffering. Pets can be used to control the victim or to emotionally abuse them.

"Playful" use of force during sex

The abuser may like to hold the victim down during sex. They may want to act out sexual fantasies in which the victim is helpless. An abuser may show little concern about whether the victim wants to have sex and use sulking or anger to manipulate the victim into compliance. They may demand sex or start having sex with the victim when they are sleeping or very intoxicated.

Rigid sex roles

Male abusers often expect women to serve and obey them. They view women as inferior to men and believe that a woman is not a whole person without a relationship with a man.

Jekyll-and-Hyde personality

Explosiveness and mood swings are typical of abusers, and these behaviors are related to other traits such as hypersensitivity. This is not always a sign of mental health problems but may be a way of controlling the victim by being unpredictable.

YOUR RIGHTS

As a society we don't often give women permission to assert and defend their sexual and emotional limits. Women are taught to be nice at all costs and to avoid offending people, even if that means giving in on their own boundaries in the process. This message is wrong. **Everyone deserves the power that comes with defining their own limits.**

You have the right to set sexual limits.

You may have different limits with different people and your limits may change throughout your life. It's a good idea to know what you want or don't want before you are confronted with an uncomfortable situation.

You have the right to communicate your limits.

Talking about sex isn't always comfortable or easy, but the only way for people to know our limits and desires is to express them. Try to find ways to feel comfortable communicating your feelings to your partner(s) and avoid engaging in sexual activities with people who you don't feel comfortable communicating with. Respect your partner(s) by checking in about their limits as well.

You have the right to call out behavior that doesn't seem right and/or remove yourself from the situation.

- Someone sitting or standing too close who enjoys your discomfort
- Power stares—looking through you or down at you
- Someone who blocks your way
- Someone speaking or acting as if they know you more intimately than they do
- Someone who grabs or pushes you to get their way
- Someone who does not listen or disregards what you are saying

You have the right to trust your feelings.

If you feel you are being pressured into unwanted sex, you're right. Don't be afraid to express those feelings and remove yourself from any situation that feels unsafe. Your well-being is more important than the other person's desires or feelings.

You have the right to be assertive.

- You can get angry when someone does something to you that you don't want
- You're allowed to act immediately with some kind of negative response. (You may want to practice this by yourself or with friends.)
- It's okay to be rude to someone who is sexually pressuring you, even if it hurts their feelings. After all, they're not paying attention to your feelings

POLICY ADDRESSING DISCLOSURES TO ALLEGED VICTIMS OF CRIMES OF VIOLENCE OR NON-FORCIBLE SEX OFFENSES

The College will, upon written request, disclose to the alleged victim of any crime of violence or a non-forcible sex offense, the report on the results of any disciplinary proceeding conducted by the College against a student who is the alleged perpetrator of such crime or offense. If the alleged victim of such crime or offense is deceased as a result of such crime or offense, the next of kin of such victim shall be treated as the alleged victim for purposes of this disclosure. Disclosure of this information shall not violate the Family Educational Rights and Privacy Act pursuant to 34 CFR § 99.31(a)(14).

POLICY ADDRESSING PREVENTION AND RESPONDING TO SEX OFFENSES

The College maintains a policy against sexual violence as part of its Policy on Affirmative Action. The College's Policy on Affirmative Action is available to all students, employees and members of the general public at the College's website or by hard copy through the Human Resources Office. The College's Policy against Sexual Violence is enforced by the College's Title IX Coordinator and states as follows:

POLICY AGAINST SEXUAL VIOLENCE

Introduction

Sexual violence is prohibited under state law and the College's Policy on Affirmative Action. Sexual violence is prohibited pursuant to Title IX of the Educational Amendment Act of 1972, which states: No person in the United States, shall on the basis of sex, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any education program or activity receiving Federal assistance.

All reported or suspected cases of sexual violence shall be reported to the College's Affirmative Action and/or Title IX Coordinator. Please refer to the Complaint Procedures for specific complaint procedures and guidelines (see Section L).

The College prohibits retaliation against any person who presents a formal or informal complaint of sexual violence or who testifies or offers evidence connected with a complaint. Retaliation is a violation of this policy whether or not the underlying claim of sexual violence is confirmed.

SEXUAL VIOLENCE DEFINED

Sexual violence is defined under the "Definitions" section of this Policy and includes rape, acquaintance rape, sexual assault, stalking, domestic and dating violence.

REPORTING COMPLAINTS OF SEXUAL VIOLENCE

A victim of sexual violence has the right to file (or not file) an Affirmative Action Discrimination Complaint Form with the College. The process for filing a complaint is outlined under the Policy on Affirmative Action's Complaint Procedure. For more information or assistance with filing a complaint, please contact the College's Title IX Coordinator. If the Title IX Coordinator is the subject of a complaint, the President shall designate another College official to administer the Complaint Procedures. A victim may also choose to file a criminal complaint, in which case the Title IX Coordinator and/or Campus Police can assist the victim with that process. Reporting the incident to the Title IX Coordinator or Campus Police does not obligate the victim to file criminal charges.

CONSENT: "Consent" must be informed, voluntary, and mutual, and can be withdrawn at any time. There is no consent when there is force, expressed or implied, or when coercion, intimidation, threats, or duress is used. Whether a person has taken advantage of a position of influence over another person may be a factor in determining consent. Silence or absence of resistance does not imply consent. Past consent to sexual activity with another person does not imply ongoing future consent with that person or consent to that same sexual activity with another person.

If a person is mentally or physically incapacitated or impaired so that such person cannot understand the fact, nature, or extent of the sexual situation, there is no consent; this includes impairment or incapacitation due to alcohol or drug consumption that meets this standard, or being asleep or unconscious.

COLLEGE'S INVESTIGATION

The College is obligated to investigate allegations of sexual violence, even if the alleged victim chooses not to file a formal complaint and/or participate in the investigation. Additionally, a complaint filed in another forum, including a criminal or civil complaint, shall not delay the College's investigation of a complaint of sexual violence. The College shall promptly and thoroughly investigate all such allegations in accordance with the Policy on Affirmative Action. The College may also institute protective measures, such as a no-trespass order, restricted access to campus, adjusted class or work schedule, or a leave of absence, during the investigative process and/or upon completion of the disciplinary process. A person found to have committed an act of sexual violence shall be subject to disciplinary action, up to and including suspension, expulsion or termination from the College, as well as criminal prosecution.

VICTIM IDENTIFICATION

Personal identifiable information about a victim will be treated as confidential and only shared with persons with a specific need to know and/or who are investigating and/or adjudicating the complaint, delivering resources or support services to the victim or as public safety requires. The College does not publish the names or other identifiable information of victims in the campus police department's Daily Crime Log, in any Timely Warnings issued or online. In accordance with the Family Educational Rights and Privacy Act, a victim may request that no directory information maintained by the College be released absent his/her prior, written consent.

PROTECTIONS FOR VICTIMS OF SEXUAL VIOLENCE

A person who is subjected to sexual violence shall:

- Be provided with a copy of the College's Sexual Violence – Victim's Rights and Information form
- Have the right to, or not to, seek assistance from campus administration or campus law enforcement
- Not be discouraged by College officials from reporting an incident to both on-campus and off-campus authorities
- Be provided assistance in contacting local law enforcement if requested and have the full and prompt assistance and cooperation of campus personnel should a civil and/or criminal complaint be pursued

- Be free from any suggestion that they somehow contributed to or had a shared responsibility in the violent act
- Receive the same level of support at any proceeding before College officials as is permitted to the accused party, including the presence of a representative during any disciplinary proceeding and the right to be notified in a timely manner of the outcome of such proceedings and any appeal right available
- Receive full and prompt cooperation from College personnel in obtaining and securing evidence (including medical evidence) necessary for any potential criminal proceedings
- Have access to existing College counseling and medical professionals, victim support services, and to obtain referrals to off-campus counseling and support services if desired
- Be permitted to attend classes, work and participate in College activities free from unwanted contact or proximity with the accused individual(s) insofar as the College is permitted and able
- Be permitted to request changes to an academic schedule if such changes are requested by the alleged victim and are reasonably available
- Be informed of any no-contact or no-trespass orders issued to the accused by the College and the College's commitment to honor any court-issued restraining or protective orders, to the extent permitted by law

RECOMMENDED PROCEDURES FOR A VICTIM OF SEXUAL VIOLENCE

For a person subjected to an act of sexual violence, there can be time-sensitive decisions to make about sexually transmitted infections, pregnancy, and collecting physical evidence in the event of prosecution. Individuals who have been victims of sexual violence are advised as follows:

Protect yourself and get medical attention – A victim should be advised to go to a safe place as soon as possible and seek medical attention immediately. Injuries and exposure to disease may not be immediately apparent. A medical examination can provide necessary treatment and collect important evidence. It is recommended that a physical exam be conducted within 72 hours of the violence. Submitting to a physical exam does not mean that a victim is required to press charges. This action merely preserves the option to do so. Designated College personnel can assist in providing transportation to the hospital.

Preserve Evidence - It is important to preserve all physical evidence following an act of sexual violence. Physical evidence may be necessary in the event criminal prosecution is pursued. If possible, a victim should be

advised not to wash, eat, drink, douche, clean, use the bathroom, or change clothes. If clothes are changed, all clothes that were worn at the time of the incident should not be cleaned and should be placed into an unused or a clean paper bag.

Health and Support Services - Various health and support services are available on and off campus for students and employees who have experienced sexual violence. For information about such services, including counseling, please contact the Affirmative Action and/or Title IX Coordinator.

RAPE CRISIS CENTER CONTACT INFORMATION

The following is a list of Rape Crisis Centers in Massachusetts. As the following contact information may be subject to change, current contact information on rape crisis centers in Massachusetts can be found at the Commonwealth's Executive Office of Health and Human Services' Website under "Consumer" information at <http://www.mass.gov/eohhs/>.

Greater Boston Area

- Boston Area Rape Crisis Center, Cambridge, 617.492.7273 Hotline, 617.492.6434 TTY

Northeastern Massachusetts

- North Shore Rape Crisis Center, Beverly, 800.922.8772 Hotline, 978.921.8729 TTY
- Rape Crisis Services of Greater Lowell, 800.542.5212 Hotline, 978.452.8723 TTY
- YWCA of Greater Lawrence, 877.509.9922 SA Hotline, 978.686.8840 TTY

Central Massachusetts

- Rape Crisis Center of Central Mass., Worcester, 800.870.5905 Hotline, 508.852.7600 TTY
- Rape Crisis Center of Central Mass., Fitchburg, 800.870.5905
- Wayside Victim Services, Milford, 800.511.5070 Hotline, 508.478.4205 TTY
- Voices against Violence, Framingham, 800.593.1125 Hotline, 508.626.8686 TTY

Southeastern Massachusetts

- A Safe Place, Nantucket, 508.228.2111 Hotline, 508.228.0561 TTY
- Independence House, Hyannis, 800.439.6507 Hotline, 508.778.6782 TTY
- Women Support Services, Vineyard Haven, 508.696.7233
- Greater New Bedford Women Center, New Bedford, 888.839.6636 Hotline, 508.996.1177 TTY
- New Hope, Attleboro, 800.323.4673 Hotline/TTY

- Stanley Street Women Center, Fall River, 508.675.0087 Hotline, 508.673.3328 TTY
- Woman Place Crisis Center, Brockton, 508.588.8255 SA Hotline, 508.894.2869 TTY

Western Massachusetts

- Elizabeth Freeman Center, Pittsfield, 413.443.0089 Hotline, 413.499.2425 TTY
- Everywoman Center, Amherst, 413.545.0800 Hotline, 888.337.0800 TTY
- NELCWIT, Greenfield, 413.772.0806 Hotline/TTY
- YWCA, Springfield, 800.796.8711
- YWCA of Western Mass, Westfield, 800.479.6245 Hotline/TTY

These Rape Crisis Centers offer FREE services to survivors of sexual violence, including:

- 24/7 hotline counseling, information, and referral
- Will go with survivors to hospitals and/or police stations 24/7
- Will go with a survivor to court
- Provide one-to-one counseling and support group counseling
- Provide primary prevention education; professional training outreach.

MANDATORY REPORTING UNDER STATE LAW

Children (a person under the age of 18) may be students at the College, or may be engaged in activities sponsored by the College or by third-parties utilizing College facilities. In such instances, where an employee has reasonable cause to believe that a child is suffering physical or emotional injury, resulting from among other causes, sexual abuse, the employee and the College may be obligated to comply with the mandatory reporting requirements established at M.G.L. Chapter 119, Section 51A-E. In such cases, the employee is directed to immediately report the matter to the College's Affirmative Action and/or Title IX Coordinator, who, in consultation with other officials, shall contact the Commonwealth's Department of Children and Families and/or law enforcement. An employee may also contact local law enforcement authorities or the Department of Children and Families directly in cases of suspected abuse or neglect.

State law also maintains mandatory reporting requirements for certain occupations where elderly and disabled abuse or neglect is suspected. For more information on these reporting requirements please contact the College's Affirmative Action Officer.

Acts of sexual violence are subject to disciplinary action pursuant to the College's Policy on Affirmative Action's Complaint Procedure. The Complaint Procedure provides as follows:

COMPLAINT PROCEDURE

GENERAL INFORMATION

Application of Policy

The complaint procedure is intended to provide a mechanism to investigate and where possible resolve complaints of alleged violations of this Policy against employees and students. The procedures outlined below are intended to ensure that the College will conduct an impartial, fair, effective, and efficient investigation of all allegations of discrimination without fear of retaliation. The complaint procedure is available to any employee or student who believes he/she has been discriminated against on the basis of a protected classification or retaliation. A complaint filed in another forum does not preclude a student or employee from filing a complaint under this Policy. Further, a complaint filed in another forum, including a criminal or civil complaint, shall not delay an investigation of a complaint filed under this Policy.

Confidentiality of Process

The complaint procedure will be conducted as confidentially as reasonably possible to protect the privacy rights of all individuals involved. The College may share information concerning the complaint with parties, witnesses and/or others during any phase of the procedure on a need-to-know basis and shall share information with union representatives as provided for in G.L.c.150E. All individuals with whom information is shared shall be advised of the confidential nature of the information and directed not to discuss the matter with anyone other than a personal advisor, if applicable.

Complainant Requests Confidentiality

Where a Complainant requests that no action be taken by the College or requests that her/his identity not be revealed, the College shall take reasonable steps to investigate and respond to the complaint, but shall inform the Complainant that such a request may hamper its ability to fully investigate an alleged violation of this Policy and/or to take appropriate remedial steps, including disciplinary action. Where an allegation includes the potential of an ongoing threat to the health, safety or security of the College or a potential adverse employment action, the Affirmative Action Officer shall inform the Complainant that it cannot ensure confidentiality and disclosure of their name may likely be required.

Anonymous Complaints

To the extent possible, the College is obliged to investigate and respond to anonymous complaints.

Off Campus Behavior

The College reserves the right to investigate alleged prohibited conduct under this Policy occurring off-campus when such conduct adversely affects the College Community, poses a threat of harm to the College Community; interferes with the College's pursuit of its educational objectives and mission, and/or if a student or employee is charged with a serious violation of state or federal law.

Interim Action

The College reserves the right to suspend a student on an interim basis or place an employee on paid administrative leave prior to completing an investigation under this Policy when it reasonably concludes that a student or employee: (a) poses a threat to health or safety; (b) poses a threat to College property or equipment; (c) is disruptive or interferes with the normal operations of the College; or (d) is charged with a serious violation of state or federal law. In such cases, the College shall provide the employee or student of the specific reason(s) for the interim action. During a student's interim suspension or an employee's leave, the College reserves the right to prohibit the individual from entering upon the College's property or participating in any College activities absent written authorization from an appropriate official of the College.

Joint Investigation

In some circumstances a Responding Party's conduct may constitute a potential violation of this Policy and/or other conduct policies applicable to employees or students. In such cases, in order to avoid duplicative investigatory efforts, a joint investigation under this Policy may be conducted by the AAO and the administrator charged with enforcing conduct policies. For example, if the Responding Party is a student, the Affirmative Action Officer and Student Code of Conduct Officer may jointly investigate the complaint. Based on the findings of their joint investigation, the student may be subject to disciplinary action for violations of the Affirmative Action Policy and/or the Student Code of Conduct. Where the Responding Party is an employee, a joint investigation may be conducted by the Affirmative Action Officer and the employee's supervisor. Based on the findings of their joint investigation, the employee may be subject to disciplinary action for violations of the Affirmative Action Policy and/or for inappropriate and unprofessional conduct.

Collateral Rights of Employees

Any disciplinary action taken against an employee shall be regarded as an administrative action subject to all terms and conditions of applicable collective bargaining agreements or personnel policies.

Complaints of Sex Discrimination, Sexual Harassment or Sexual Violence

The Title IX Coordinator shall have the responsibility for administering this Policy relative to complaints of sex discrimination, sexual harassment and sexual violence.

COMPLAINT PROCEDURE

The complaint process is comprised of two procedures - the informal procedure and the formal procedure.

Informal Procedure

Where appropriate, the parties to a dispute and/or the Affirmative Action Officer, may attempt to reach an informal and prompt resolution of the potential complaint. Informal resolution is encouraged and any of the parties involved may request the intervention of the Affirmative Action Officer to assist in resolving the matter informally. An informal resolution is achieved through open dialogue between the parties that allows for the airing of any misunderstandings or disputed issues. The informal procedure shall not be used in an effort to resolve allegations of sexual harassment or sexual violence. Further, at no time shall a Responding Party question or confront a Complainant, or engage a third party to do so, as such conduct may constitute intimidation and/or retaliation, which are strictly prohibited under this Policy.

Formal Procedure

The following rules apply throughout all phases of the formal complaint process: (1) all parties to a complaint may have a personal advisor (for union employees this may be a union representative); (2) the role of a personal advisor is limited to providing discrete advice and counsel to the party; (3) the filing of a complaint under this Policy shall not preclude a Complainant from pursuing a complaint in a separate legal forum; (4) a complaint involving a grade dispute shall proceed under this Policy when a student alleges that a grade was improper because of discrimination, discriminatory harassment, sexual violence or retaliation; and (5) all findings reached under this procedure must be based on a "preponderance of evidence" (i.e.; more likely than not) standard.

At any point during the formal complaint procedure, either party may request mediation by contacting the Affirmative Action Officer. The

purpose of mediation is to resolve the dispute to the satisfaction of both parties. Mediation shall be mutually agreed upon by the parties. The Affirmative Action Officer, or designee, shall select an impartial mediator, who shall be mutually agreed upon and not unreasonably refused by either party, and inform the parties in writing of the mediation process and schedule. The mediator must have training or experience in mediating matters subject to this complaint process. Where practicable, a mediation session shall be conducted no later than thirty (30) days after agreed to by the parties. The timelines presented under the Complaint Procedure shall be tolled pending the outcome of mediation. If mediation is successful in resolving the complaint, the Affirmative Action Officer shall reduce to writing the terms of the mediated resolution, which shall be signed by the parties. The mediation process shall not be used in an effort to resolve allegations of sexual harassment or sexual violence. If mediation does not result in a resolution, all mediation discussions shall remain confidential and may not be used or introduced in this process or any other forum.

STEP 1 – AFFIRMATIVE ACTION OFFICER INVESTIGATION

When a Complainant believes that he/she has been discriminated against because of his/her race, color, religion, national origin, sex, age, disability, sexual orientation, gender identity, genetic information, veteran status, maternity leave and/or subjected to sexual harassment, sexual violence, or retaliation, the Complainant may file a formal written complaint in writing with the Affirmative Action Officer. For student Complainants, a formal complaint may be filed within thirty (30) days following the end of the instructional period when the Complainant knew or should have known of the grievable act. For employee Complainants, a formal complaint may be filed within thirty (30) days from when the Complainant knew or should have known of the grievable act. The complaint shall contain a statement of all known facts pertaining to the alleged violation and shall be filed preferably on the Affirmative Action Discrimination Complaint Form (see Appendix A), which shall be available from the Affirmative Action Officer. If a student is involved, the Affirmative Action Officer shall notify the Vice President or Dean of Student Services.

During Step 1, the Affirmative Action Officer has the authority to seek to resolve the complaint through an administrative remedy. If the parties accept the administrative remedy proposed, its terms shall be reduced to writing, signed by both parties and the Affirmative Action Officer shall retain the document, with copies to the parties. Thereafter, the matter shall be considered resolved between the parties.

Upon receiving a written complaint, the Affirmative Action Officer will notify the Responding Party in writing, of the complaint (see Appendix B), and provide the Responding Party with a copy thereof. The timeliness

of such notification shall be in accordance with the appropriate collective bargaining agreement, if applicable. The Responding Party shall have ten (10) days from receipt of notice to submit to the Affirmative Action Officer a written response to the complaint.

Where practicable, within thirty (30) days from the date the Respondent's written response is received, or the date it was due if none was submitted, the Affirmative Action Officer shall conduct an investigation and prepare and issue a Report of Preliminary Findings to the parties. The investigation shall include, but is not limited to, an analysis of the allegations and defenses presented, consideration of all relevant documents, including materials presented by the parties, interviews of the parties and other individuals and/or witnesses, and/or reviewing certain documents or materials in the possession of either party that the Affirmative Action Officer has deemed relevant to the complaint. The Affirmative Action Officer's report shall specify the investigation undertaken and summarize his/her preliminary findings. The report shall be delivered to the parties in hand or by certified mail. If the investigation is not completed within thirty (30) days, status updates shall be provided to the parties every thirty (30) days until its completion.

Thereafter, the parties will have ten (10) days from the date of their receipt of the Report of Preliminary Findings to submit Rebuttal Statements to the Affirmative Action Officer. The parties may present no new allegations at that time. Where practicable, within seven (7) days of receiving the parties' Rebuttal Statements, the Affirmative Action Officer shall review the rebuttal Statements and prepare and submit a Report of Final Findings and Recommendations to the President's Designee for consideration.

STEP 2 – REVIEW AND DECISION BY THE PRESIDENT'S DESIGNEE

Where practicable, within ten (10) days of receipt of the Affirmative Action Officer's Report of Final Findings and Recommendations, the President's Designee shall issue a written decision to the parties. The written decision shall accept, reject or modify the Affirmative Action Officer's Final Findings and Recommendations. The Designee's written decision shall be delivered in hand or by certified mail and shall include the Report of Final Findings and Recommendations. If the President is the Responding Party in an Affirmative Action Complaint, then the Chair of the College's Board of Trustees shall designate a Board member(s) as Designee to administer Step 2 of the Complaint Process.

STEP 3 – APPEAL TO PRESIDENT

A party who is not satisfied with the Designee's written decision may file an appeal with the President within five (5) days of receiving the Designee's decision. Where practicable, within five (5) days of receiving the appeal, the President shall issue a written decision accepting, rejecting or modifying the Designee's decision. The President's decision is final provided that any corrective action and/or discipline imposed is subject to applicable collective bargaining agreements.

If the President is the Responding Party in an Affirmative Action Complaint, then the Chair of the College's Board of Trustees shall consider the appeal and issue the written decision.

ISSUING TIMELY WARNINGS (QCC ALERT) POLICY STATEMENT

The QCC Alert ("Alert") is provided to give students, faculty, staff and visitor's timely notification of crimes or other emergencies occurring that may represent a serious or on-going threat to the campus community and to heighten safety awareness. The Alert also seeks information that may lead to arrest and conviction of the offender when violent crimes against persons or substantial crimes against property have been reported.

Quinsigamond Police are responsible for issuing a Crime Alert when a crime is reported to or brought to the attention of Police or other campus security authorities. Information for the Alerts may also come from local law enforcement agencies depending on the location of the campus. Every attempt will be made to distribute the Alert within a reasonable amount of time the incident is reported to Quinsigamond Police; however, the release is subject to the availability of accurate facts concerning the incident, and investigation restraints. Alerts are created by the Chief of Police or the on duty police supervisor and may be distributed the following ways dependent upon the segment of our population that is at risk. QCC Alert System

- Text Messaging
- Bulletin Board Postings
- QCC Family E-mail
- QCC Student Portal
- QCC Fire / Emergency Alert speaker system /Roof top Siren
- Alertus - Desk Top Computer Notification

Visit www.QCC.edu/alerts for emergency and weather related announcements.

Emergency and Inclement weather alerts are sent out as a text message using the QCC Alert system.

Students and Faculty can set up and maintain their QCC alert phone numbers via *The Q* Users must log in to *The Q* and select the “My QCC Alert Contact Info” link.

Staff can send their phone number via email to help@qcc.mass.edu

ALCOHOL/DRUG POLICY STATEMENTS

QUINSIGAMOND COMMUNITY COLLEGE ALCOHOL & DRUG POLICY FOR STUDENTS

ALCOHOL CONSUMPTION

The serving and/or consumption of alcohol by students is strictly prohibited on all College property, in College vehicles, and at all off-campus College-sponsored events. Exception: An event-sponsoring group or its designated agent may, no less than seven days prior to an event, submit a written request to the President (or his/her designee) seeking permission for an exception to this policy. To be valid, permission must be explicit, written, and issued in advance of the event. At College functions where alcohol is available, all State and Federal Laws will be enforced. Use of College funds for the purchase of alcohol is prohibited.

POSSESSION, USE, MANUFACTURE, OR DISTRIBUTION OF DRUGS

Quinsigamond Community College complies with all State and Federal Laws with regard to the possession, use, manufacture, and/or distribution of unlawful substances. All such activities are strictly prohibited on all College property, in College vehicles, and at all off-campus College-sponsored events.

INFORMATION, TRAINING AND ASSISTANCE

The College annually sponsors a variety of alcohol and drug education programs for students. The Offices of Student Support Services and the Health and Wellness Resource Center maintain a comprehensive list of support services in the community.

SANCTIONS

Students drinking alcoholic beverages on the Quinsigamond Community College Campus or at a Quinsigamond Community College sponsored event without prior approval will receive the following sanctions.

The first offense, the student will not be allowed to participate in any extracurricular activities such as campus clubs and organizations

and organized intramural or varsity sports. Counseling may also be required after the first offense if the Dean of enrollment and Student Services deems the offense severe enough to warrant counseling for alcohol abuse.

The second offense in either a semester of an academic year will result in immediate dismissal from the college.

The possession, use, manufacture or distribution of drugs on the Quinsigamond Community College Campus or at a Quinsigamond Community College sponsored event will result in immediate dismissal from the college.

Quinsigamond provides alcohol/drug education programs to educate and inform the entire Quinsigamond Community (students, faculty, and staff) of the legal, social and personal consequences related to the misuse of alcohol and other drugs. This education is designed to enhance one's decision-making skills and to help the individual generate alternative healthier choices. The various means of educating the Quinsigamond community may include: seminars, written material, video resources, peer educators, individual and group counseling and professional speakers. Programs are developed and presented to the Quinsigamond community in classrooms and common areas throughout the College. Students, faculty and staff are encouraged to refer persons troubled by alcohol and/or drug use to the Quinsigamond Counseling Center or to one of the various community support services available in and around Worcester. A list of these services is available through the Student Enrollment Services, Public Safety Department.

Quinsigamond Community College prohibits the unlawful possession, use or distribution of illicit drugs and or alcohol on its property or as part of any campus activity. Students under the influence of drugs or alcohol, or having them in their possession, will be sanctioned under the College Code of Conduct

Federal, state and local sanctions for unlawful possession or distribution of illicit drugs range from probation and forfeiture of property to fines and imprisonment. For example, the sanctions against an individual for distribution of, or possession with intent to distribute, controlled substances include imprisonment for several years up to a maximum of life imprisonment, with fines up to \$4 million. Sanctions can increase for repeat offenders or for offenses resulting in death or serious bodily harm, and can be doubled for each of the following occurrences: distribution to persons under 18 years of age, distribution within 1,000 feet of a school, including the College Campus School, or employing someone under 18 in the distribution. Attempt or conspiracy to commit a crime can be treated as severely as the intended offense. Many of the state and federal statutes that prohibit the illegal distribution of controlled substances provide for minimum mandatory prison sentences. Conviction for violation of any state or federal drug law can lead to

PENALTIES UNDER MASSACHUSETTS LAW:

ILLEGAL OFFENSE	SANCTION	STATUTE
Using, altering, selling or distributing false ID or driver's license	Up to \$200 fine or up to 3 months' imprisonment	MA Gen Law 138 §34B
Transporting alcoholic beverages in a vehicle by driver under 21 years of age	Up to \$50 fine for first offense; up to \$150 fine for subsequent offenses AND suspension of driver's license for 90 days	MA General Law 138 §34C
Furnishing alcoholic beverages to another under 21 years of age	Up to \$2,000 fine and/or up to 1 year imprisonment	MA General Law 138 §34
Making, stealing, altering, forging or counterfeiting a driver's license or identification card or for possessing or using such a license or identification card	Fine up to \$500 or up to five years in prison; immediate suspension of driver's license for up to 1 year	MA General Law 90 §24B
Purchasing or attempting to purchase alcoholic beverages if under 21 years of age, including using a false ID	Fine of \$300 and suspension of driver's license for 180 days	MA General Law 138 §34A
Having an "open container" of alcohol as a passenger in a vehicle	Fine of \$100 up to \$500	MA General Law 90 §24I
Driving under the influence, if under the age of 21, is driving with a blood alcohol level of .02 as a percentage by weight of alcohol in the blood	Fines not less than \$500 and up to \$5,000; mandatory suspension of license for 180 days and up to 1 year and/or up to 2.5 years' imprisonment for the first offense. Subsequent offenses carry significantly higher penalties.	MA General Law 90 §24 (1)(a) and §24P
Driving under the influence, if over the age of 21, is driving with a blood alcohol level of .08 as a percentage by weight of alcohol in the blood	Fines not less than \$500 and up to \$5,000; suspension of license for 1 year and/or up to 2.5 years' imprisonment for the first offense. Subsequent offenses carry significantly higher penalties.	MA General Law 90 §24 (1)(a)
Refusal to submit to a breathalyzer test	Immediate suspension of a driver's license for minimum of 180 days. If under 21 years of age OR previously convicted of driving under the influence, immediate suspension of driver's license for 3 years or longer.	MA General Law 90 §24(1)(f)(1)
Causing serious bodily harm while driving under the influence of alcohol	2.5 to 10 years' imprisonment and a fine up to \$5,000; revocation of driver's license for 2 years	MA General Law 90 §24L

ineligibility for any federal benefit, including grants and loans. Thus a student can make themselves ineligible for student loans through drug conviction.

Massachusetts makes it illegal to be in a place where heroin is kept and to be “in the company” of a person known to possess heroin. Any person in the presence of heroin, risks conviction of a serious drug offense. Sale and possession of “drug paraphernalia” is illegal in Massachusetts.

ALCOHOL'S EFFECT ON YOU

Alcohol goes directly into the bloodstream, physically affecting the whole body. Some illnesses and health problems caused by alcohol include:

- **Hangovers.** Headaches, nausea, vomiting, aches and pains all result from drinking too much. Drinking to the point of drunkenness makes you sick.
- **Weight gain.** Alcohol is not water. A beer has about 150 “empty” calories that provide few if any nutrients.
- **High blood pressure.** Along with being overweight, high blood pressure is associated with many serious health problems.
- **Depressed immune system.** Impaired immunity makes you more likely to contract viral illnesses such as flu and infections.
- **Cancer.** 2-4% of all cancer cases are related to alcohol. Upper digestive tract cancers are the most common, hitting the esophagus, mouth, larynx, and pharynx. Women who drink prior to menopause are more likely to develop breast cancer. Your risk of skin cancer doubles if you drink slightly more than “moderate levels.” Some studies implicate alcohol in colon, stomach, pancreas and lung cancer. And let’s not forget the liver...
- **Liver disease.** Heavy drinking can cause fatty liver, hepatitis, cirrhosis and cancer of the liver. The liver breaks down alcohol at the rate of only one drink per hour.
- **Alcohol poisoning.** Drinking large amounts can result in alcohol poisoning, which causes unconsciousness and even death. Breathing slows, and the skin becomes cold and may look blue. Don’t let a person in this condition “sleep it off.” Call 911.
- **Heart or respiratory failure.** Excessive drinking can have serious results. Heart or respiratory failure often means death.

Other long-term effects of heavy alcohol use include loss of appetite, vitamin deficiencies, stomach ailments, sexual impotence, central nervous system damage, and memory loss. Finally, let’s not forget alcoholism. Alcoholism is a disease to which some people seem predisposed. Alcoholics are unable to control their drinking—how much, when, and if. Alcoholism puts you at great risk for other health problems, and it can shorten your life by more than 10 years. Alcoholism cannot be cured, but it can be treated. Through education, treatment, and self-help support such as AA, people can learn to live alcohol-free and feel good.

HOW DRUGS AFFECT YOU:

Like many prescription drugs, “recreational” drugs come with potentially harmful side effects that can have serious and long-term effects on your health.

High doses of many of the drugs, or impure or more dangerous substitutes for these drugs, can cause immediate life-threatening health problems such as **heart attack, respiratory failure, and coma**. Combining drugs with each other or with alcohol is especially dangerous.

- Barbiturates and tranquilizers are commonly abused prescription drugs. They can cause hangover-like symptoms, nausea, seizures, and coma. Overdose or mixing these drugs with alcohol can be fatal.
- Cocaine can cause such long-term problems as tremors, seizures, psychosis, and heart or respiratory failure.
- LSD can cause nausea, rapid heart rate, depression, and disorientation. Long-term effects include paranoia and psychosis.
- Marijuana and hashish can cause rapid heart rate and memory impairment soon after use. Long-term effects include cognitive problems, infertility, weakened immune system, and possible lung damage.
- Narcotics such as heroin can bring on respiratory and circulatory depression, dizziness, impotence, constipation, and withdrawal sickness. Overdoses can lead to seizures and death.
- PCP, in addition to triggering unpredictable and violent behavior, can cause dizziness, numbness, high heart rate and blood pressure, convulsions, and in high amounts fatal heart and lung failure or ruptured blood vessels.
- Stimulants such as amphetamines have health effects that include high heart rate and blood pressure, headache, blurred vision, dizziness, impotence, skin disorders, tremors, seizures, and psychosis.

FOR EMPLOYEES

ALCOHOL CONSUMPTION:

The serving and/or consumption of alcohol by students and employees is strictly prohibited on all College property, in College vehicles, and at all off-campus College-sponsored events.

Exception: An event-sponsoring group or its designated agent may, no less than seven days prior to an event, submit a written request to the President (or his/her designee) seeking permission for an exception to this policy. To be valid, permission must be explicit, written, and issued in advance of the event. At College functions where alcohol is available, all State and Federal Laws will be enforced. The Dean of Students, Coordinator of Student Life, club advisors, athletic coaches and other responsible College employees are expected to communicate this policy to students to ensure compliance. Use of College funds for the purchase of alcohol is prohibited.

POSSESSION, USE, MANUFACTURE, OR DISTRIBUTION OF DRUGS:

In conformance with the Drug Free Workplace Act of 1988:

1. Quinsigamond Community College complies with all State and Federal Laws with regard to the possession, use, manufacture, and/or distribution of unlawful substances. All such activities are strictly prohibited on all College property, in College vehicles, and at all off-campus College-sponsored events. Violation of this policy by an employee will normally result in the termination of employment.
2. Employees convicted of any criminal drug statute violation in the workplace must, within five days of said conviction, report same to the Director of Human Resources through written notification.
3. The College, within thirty days of receiving such notice with respect to an employee who is convicted, will:
 - a. Take appropriate disciplinary action which may include termination of employment; and/or
 - b. Require such employee to participate satisfactorily in an appropriate drug abuse or rehabilitation program.

INFORMATION, TRAINING AND ASSISTANCE

The College annually sponsors a variety of alcohol and drug education programs for students and employees. The Offices of Student Support Services and the Health and Wellness Resource Center maintain a comprehensive list of support services in the community.

The College also provides an Employee Assistance Program for all employees. This service is administered by The Wellness Corporation and is available 24 hours per day, seven days per week at 1.800.828.6025. Other resources are on file in the Human Resources Office.

FIRE SAFETY / EVACUATION

Quinsigamond Community College does not maintain on-campus housing for students and as such is not required to publish a separate annual fire safety report. The College Police Department works closely with the Worcester Fire Department to keep the campus safe from fire hazards. The College Police Department is responsible for all fire systems on the main campus. Each College building has a monitored fire alarm system activated by manual pull stations and smoke detection units. A yearly professional inspection of the fire safety system is performed. Anyone having concerns about fire safety equipment or a possible fire hazard on campus is urged to immediately call Quinsigamond Police at 508.854.4221. A Quinsigamond Police Officer is assigned as a Fire Safety Officer and conducts educational

sessions with faculty and professional staff around fire safety issues. Each office area has a Departmental Emergency Evacuation Plan that is updated every September and February. Unscheduled fire alarm drills are held each semester to make sure community members will know how to react and evacuate each building.

CAMPUS EMERGENCY RESPONSE AND EVACUATION PROCEDURES

The College has an active Emergency Management Team chaired by the Chief of Police. The EMT is responsible for coordinating all aspects of Emergency Management. Complete Emergency Management Community Guide.

The campus community will be immediately notified once the College Police Department is able to confirm (Either through internal resources such as Facilities, Health services, and on duty officers or local outside agencies such as Police, Fire or EMS) a significant emergency or dangerous situation involving an immediate threat to the health or safety of students, employees, and visitors on any of the College campuses.

Once confirmed the Chief of Police or the on duty police supervisor will then determine the appropriate segment or segments of the campus community to receive a notification. This may vary depending upon the actual event as it may only affect a certain building or campus location or if it is determined to affect all the campus or several campuses the actual notification will only be broadcasted to that location if possible. If it is determined to effect all College campuses all will be notified using the QCC Alert System.

Once the appropriate locations are determined the Chief of Police or the on duty police supervisor will then determine how much information the notification should contain. The content of notification will take into account the actual situation as some cases the content may differ such as in the case of an approaching tornado it may be best for some take shelter in a basement area and others to stay off campus.

Campus QCC ALERT communication systems consist of voicemail, email, text, Alerts-Desk top messaging, roof top siren, and fire/emergency speaker notification. The on duty police dispatcher or designee will broadcast the message through the QCC Alert System to the campus community. The on duty police dispatcher or designee will post regularly updated messages on the emergency web page as directed by the Chief of Police or designee. Depending on the level of the emergency, College Police will utilize the roof top loudspeaker siren system to broadcast a message. The broadcast messages will contain information directing the campus community to follow specific instructions and take particular action as necessary. Fire alarms may be used in an immediate emergency to evacuate the building only at the direction of Campus Police. In the event that all communications are inactive, College Police will activate all cruiser sirens throughout the

campus to warn the College community. All classrooms and offices have evacuation maps posted on the wall. Please become familiar with the evacuation routes and move at least 500 feet from the building when the need to evacuate is necessary.

As soon as Quinsigamond Police have confirmed that a significant emergency or dangerous situation exists, the College will:

- Take into account the safety of the campus community
- Determine what information to release about the situation
- Begin the notification process

The only reason the College would not immediately issue a notification for a confirmed emergency or dangerous situation is if doing so will compromise efforts to:

- Assist a victim
- Contain the emergency
- Respond to the emergency
- Otherwise mitigate the emergency. An example of not compromising efforts to mitigate the emergency maybe at the request of local law enforcement or fire department officials

Emergency Procedures are tested on a yearly basis.

MISSING STUDENTS

Quinsigamond Community College does not have residential housing and therefore does not maintain a missing person policy.

RESPONSE TO SEXUAL OFFENSE, RELATIONSHIP VIOLENCE AND STALKING STATEMENT OF POLICY

Quinsigamond Community College is required to comply with Title IX of the Higher Education Amendments of 1972, 20 U.S. C. s.1681 et seq. ("Title IX") which prohibits discrimination on the basis of sex in education programs and activities. QCC is committed to providing an atmosphere for learning that is free of any conduct that could be considered harassing, abusive, disorderly, discriminatory or criminal. As such, QCC prohibits sexual misconduct (including sexual harassment and sexual assault), domestic violence, dating violence, and stalking all of which violate Federal Civil Rights law, and may be subject to criminal prosecution. QCC is committed to fostering a community that promotes prompt reporting of sexual misconduct, domestic violence, dating violence, or stalking in any form. QCC is committed to timely and fair resolution of complaints. Creating a safe and respectful environment is the responsibility of all members of the College community; students, staff, faculty, and guests. This policy covers sexual misconduct, sexual assault, domestic violence, dating violence and stalking as defined by Title IX and the Clery Act (pursuant to the Reauthorization of the Violence against Women Act (VAWA).

Sexual misconduct as defined by Title IX is actual or attempted:

- Sexual harassment
- Non-consensual sexual intercourse
- Non-consensual sexual contact
- Sexual Exploitation

Sexual assault includes forcible and non-forcible offenses as classified under the uniform crime reporting (UCR) system of the Federal Bureau of Investigation pursuant to the Clery Act; including acquaintance rape.

The College's sexual harassment policy also will be applied to violations as appropriate under Title IX.

REPORTING PROCEDURES

The procedures outlined below and focus primarily on the roles of:

- Campus police in addressing incidents of sexual assault, domestic violence, dating violence, and stalking
- Faculty, staff and students making reports
- The Designated College Official's involvement in these procedures
- The Title IX Coordinator's role in policy and enforcement

REPORTING SEXUAL ASSAULT, DOMESTIC VIOLENCE, DATING VIOLENCE OR STALKING

What to do:

If you are the survivor (victim) of a sexual assault, sexual misconduct, domestic violence, dating violence or stalking at this institution, your first priority should be to get to a place of safety and to obtain necessary medical treatment.

When to report:

Quinsigamond Police strongly advocate, that a survivor (victim) of sexual assault, domestic violence, dating violence, stalking or other violent crime report the incident in a timely manner. Time is a critical factor for evidence collection and preservation.

Who to make a report to:

College Police, State Police, or local police

Sexual assault, domestic violence, dating violence, stalking complaint or other report of crime should be reported directly to Quinsigamond College Police, State or local law enforcement department in the jurisdiction of the campus. Filing a police report regarding a sexual assault with a police officer will not obligate the survivor to prosecute, nor will it subject the

survivor to scrutiny or judgmental opinions from officers. In the case of a report of domestic violence or dating violence or stalking (if such case also involves domestic violence or dating violence), and if the perpetrator is identified and probable cause exists, will require the police officer to take legal action, including arrest/warrant application: taking into account first and foremost, the safety of the victim survivor.

TITLE IX COORDINATOR

Reporting parties are encouraged to contact the Title IX coordinator currently:

Shannon Overcash

Associate Director of Compliance/Title IX Coordinator

Quinsigamond Community College
670 West Boylston St., Worcester, MA 01606
Room 421A / Tel: 508.854.7408

The Choice to Prosecute:

The decision whether or not to prosecute does not negate the responsibility of the College to take disciplinary action if the suspect is associated with the College. The College is also responsible to count the statistic. The College may also have an obligation to issue a timely notice for the safety of others in the college community. The survivor's identity will be withheld to the extent permissible by law. Despite the survivor's desire not to prosecute, the College may also have an obligation to investigate to the extent possible in consideration of the details known, and may have an obligation to take action against the perpetrator for the safety of the college community.

Filing a report will:

- Ensure that a survivor of sexual assault, sexual misconduct, domestic violence, dating violence, or stalking receives the necessary medical treatment and tests, at no expense to the survivor (victim)
- Provide the opportunity for collection of evidence helpful in the prosecution, which cannot be obtained later (ideally the survivor of a sexual assault (or other applicable crime) should not wash, douche, use the toilet, or change clothing prior to a medical/legal exam)
- Ensure the survivor has access to free confidential counseling from counselors specifically trained in the area of sexual assault crisis intervention and/or domestic/dating violence intervention
- Provide assistance in obtaining an order of protection against the perpetrator

Quinsigamond Police Response

When a sexual assault is reported to or discovered by campus police the initial reporting officer will:

- Obtain necessary information to make a determination of the need for emergency response procedures and to take necessary action for the safety of the victim survivor and the college community as a whole
- Encourage the victim survivor to seek immediate medical attention and assist the victim survivor with obtaining access to medical treatment
- Arrange for notification to the Chief of Police, or Police Supervisor on duty
- Offer to assist the victim survivor to contact the rape crisis hotline.
- Secure evidence
- In the case of an off-campus crime, the campus police officer will assist the victim survivor in making a report to the proper agency and will remain informed
- Enter the crime statistic in the daily crime log (see also Daily Crime Log in this document)

Reporting to an alternate police department:

Quinsigamond College Police will aid the survivor in notifying the appropriate authorities if the individual requests their assistance. The Quinsigamond College Police will notify the appropriate local police detective unit in the jurisdiction of the assault as appropriate to the investigation. Quinsigamond College Police will work collaboratively with the local police to conduct the investigation in a fair and timely manner. The survivor of a sexual assault may choose for the investigation to be pursued through the criminal justice system and the College conduct system, or only the latter. A College representative from the Quinsigamond College Police or from the College counseling services will guide the survivor through the available options and support the survivor in his/her decision. Various counseling options are available through the employee assistance, and counseling services. Counseling and support services outside the College system can be obtained through the Following locations: Rape Crisis Center, Domestic Violence Hotline, and Victim Advocacy program of the District Attorney's office. (See list of all services below).

Disciplinary Sanctions and Procedures

College disciplinary sanctions are detailed in the Student Handbook and is published annually on-line. Possible sanctions include: verbal or written warnings, restrictions/loss of privileges, community educational service, restitution, probation, suspension and/or expulsion or any combination of the above. The Handbook provides, in part, that the accuser and the accused have the same right and opportunity to have others present (in support and advisory roles) during a campus disciplinary hearing. Notification of final results to both the accuser and the accused will be made in the same manner and, in the same time frame. In the case that an alleged survivor (victim) dies as a result of a crime, the alleged victim's next of kin will be notified of the results of any disciplinary proceedings. A student found guilty of violating the College Sexual Misconduct, Relationship

Violence and Stalking Policy, could be criminally prosecuted in the courts of the Commonwealth of Massachusetts. Student survivors (victims) have the option to change their academic schedules after an alleged sexual assault, if such changes are reasonably available.

MENTAL HEALTH AND COUNSELING SERVICES AVAILABLE POLICY STATEMENT

OFF CAMPUS LOCATIONS

Sexual Assault/Domestic Violence

- YWCA Daybreak—in Central Massachusetts | Support services for battered women and their children (SAFELPLAN host location)
24-hour Hotline 508.755.9030 | www.ywcaworcester.org
- Gay Men's Domestic Violence Project—800.832.1901
www.gmdvp.org
- Jane Doe Inc—The Massachusetts Coalition Against Sexual Assault and Domestic Violence | Phone: 617.248.0922 | Fax: 617.248.0902 | TTY/TTD: 617.263.2200 | www.janedoe.org
- National DV Hotline—1.800.799.SAFE (1.800.799.7233) or 1.800.787.3224 TTY | www.ndvh.org
- National Sexual Violence Resource Center | 717.728.9740
www.nsvrc.org
- Rape, Abuse & Incest National Network—1.800.656.HOPE (1.800.656.4673) | www.rainn.org

Shelter-Central Massachusetts

- Safelink—Massachusetts Statewide Shelter Hotline | Information regarding shelter across the state- this is the best number to try first. They will search the statewide database for any available bed and coordinate transportation for most shelters throughout Massachusetts. | 877.785.2020 Voice or 877.521.2601 TTY
- YWCA Daybreak—24-hour Hotline 508.755.9030
www.ywcaworcester.org

Health/Medical

- Aids Action Committee—HIV/AIDS & STD Hotline 800.235.2331
TTY: 617.437.1672 | Hepatitis Hotline 888.443.4372
TTY: 617.437.1672 | www.aac.org
- Emergency Contraception Information—888.not.2.late (1.888.668.2528) | www.not-2-late.com
- National HIV/AIDS Hotline—1.800.342.AIDS or 1.800.342.2437 TTY 1.800.243.7012 Spanish 1.800.344.SIDA

Victim Rights/Legal Support

- Criminal History Systems Board Victim Services Unit
Massachusetts—617.660.4600 | www.mass.gov

- National Center for Victims of Crime—1.800.FYI.CALL or 1.800.394.2255 | www.ncvc.org
- National Organization for Victim Assistance—1.800.TRY.NOVA or 1.800.879.6682 | www.try-nova.org
- U.S. Attorney's Office, Victim Witness Assistance—Massachusetts 617.748.3140 | www.usdoj.gov/usao/ma/vicwit.html
- Victim Bill of Rights
- Victim Compensation Applications (Need Adobe Reader)
- Victim Rights Law Center—Providing sexual assault victims with free legal help | 617.399.6720 | www.victimrights.org

ON CAMPUS

Contact Information Quinsigamond Counseling

Administration Building, Room 162A
670 West Boylston Street
Worcester, MA 01606-2092
508.854.4479 or 508.854.4233 or 508.854.4233
Fax: 508.854.4357

CLERY REPORTABLE CRIME DEFINITIONS:

- **Murder and Non-negligent Manslaughter** – The willful (non-negligent) killing of one human being by another.
- **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 is usually accompanied by the use of a weapon or by means likely to produce death or great bodily harm. It is not necessary for an injury to result when a gun, knife or other weapon is used in the commission of the crime.
- **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.
- **Motor Vehicle Theft** – The theft or attempted theft of a motor vehicle. (Classify as motor vehicle theft all cases where automobiles are taken by persons not having lawful access even though the vehicles are later abandoned-including joyriding.)
- **Arson** – Any willful or malicious burning or attempt to burn, with or without intent to defraud, a dwelling house, public building, motor vehicle or aircraft, personal property of another, etc.

- **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 consent of the victim.
- **Fondling** – The touching of the private body parts of another person for the purposes of sexual gratification, without the consent of the victim, including instances where the victim is incapable of giving consent because of his/her age or because of his/her temporary or permanent mental incapacity.
- **Incest** – Non-forcible sexual intercourse between persons who are related to each other within the degree wherein marriage is prohibited by law.
- **Statutory Rape** – Non-forcible sexual intercourse with a person who is under the statutory age of consent.
- **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.
- **Liquor Law Violation** – The violation of 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; or any attempts to commit any of the foregoing violations. Note: this list does not include public drunkenness and driving under the influence.
- **Drug Law Violation** – Violations of State and local laws related to the 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(s)); and dangerous non-narcotic drugs (barbiturates, Benzedrine).
- **Weapon Law Violation** – The violation of laws or ordinances regulating weapons.

OTHER VAWA OFFENSES:

- **Domestic Violence** – includes asserted violent misdemeanor and felony offenses committed by the victim's current or former spouse, current or former cohabitant, person similarly situated under domestic or family violence law, or anyone else protected under domestic or family violence law.
- **Dating Violence** – means violence by a person who has been in a romantic or intimate relationship with the victim. Whether there was such relationship will be gauged by its length, type, and frequency of interaction.
- **Stalking** – means a course of conduct directed at a specific person that would cause a reasonable person to fear for her, his, or others' safety, or to suffer substantial emotional distress. State Definition: (a) Whoever (1) willfully and maliciously engages in a knowing pattern of conduct or series of acts over a period of time directed at a specific person which seriously alarms or annoys that person and would cause a reasonable person to suffer substantial emotional distress, and (2) makes a threat with the intent to place the person in imminent fear of death or bodily injury, shall be guilty of the crime of stalking.

ARRESTS AND REFERRALS FOR DISCIPLINARY ACTION

The third category of crime statistics is the number of arrests and the number of referrals for disciplinary action for the categories listed below. Please note, these statistics are based on violations of the law, and not the College policies that resulted in the disciplinary referral.

HATE CRIMES

A hate crime is a criminal offense committed against a person or property which is motivated, in whole or in part, by the offender's bias. Bias is a performed negative opinion or attitude towards a group of persons based on their race, gender, religion, disability, sexual orientation, ethnicity, national origin or gender identity. **For Clery purposes, hate crimes include any of the above offenses (minus non-negligent manslaughter) and the addition of the categories below.**

- **Larceny** – The unlawful taking, carrying, leading, or riding away of property from the possession or constructive possession of another.
- **Simple Assault** – The unlawful physical attack by one person upon another where neither the offender displays a weapon, nor the victim suffers obvious severe or aggravated bodily injury involving apparent broken bones, loss of teeth, possible internal injury, severe lacerations, or loss of consciousness.
- **Vandalism** – To willfully or maliciously destroy, injure, disfigure, or deface any public or private property, real or personal, without the consent of the owner or person having custody or control by cutting, tearing, breaking, marking, painting, drawing, covering with filth, or any other such means as may be specified by local law.
- **Intimidation** – To unlawfully place another person in reasonable fear of bodily harm through the use of threatening words and/or other conduct, but without displaying a weapon or subjecting the victim to actual physical attack.

CRIME STATISTICAL REPORT: WORCESTER

QUINSIGAMOND COMMUNITY COLLEGE | 670 West Boylston Street - Main Campus

CRIME STATISTICS: CLERY DATA - The following annual security report provides crime statistics for selected crimes that have been reported to local police agencies or to campus security authorities. The statistics reported here generally reflect the number of criminal incidents reported to the various authorities. The statistics reported for the sub-categories on liquor laws, drug laws, and weapons offenses represented the number of people arrested or referred to campus judicial authorities for respective violations, not the number of offenses documented. This report complies with 20 U.S. Code Section 1092 (f). ***The College is a non-residential institution. The College has no unfounded crime reports withheld from the below crime statistics.**

OFFENCES	2024			2022			2023		
	On-Campus	Public Property	Non-Campus	On-Campus	Public Property	Non-Campus	On-Campus	Public Property	Non-Campus
Murder/Non-negligent Manslaughter	0	0	0	0	0	0	0	0	0
Negligent Manslaughter	0	0	0	0	0	0	0	0	0
Rape	0	0	0	0	0	0	0	0	0
Fondling	0	0	0	2	0	0	01	0	0
Incest	0	0	0	0	0	0	0	0	0
Statutory Rape	0	0	0	0	0	0	0	0	0
Robbery	0	0	0	0	0	0	0	0	0
Aggravated Assault	0	0	0	2	0	0	0	0	0
Burglary	0	0	0	0	0	0	0	0	1
Motor Vehicle Theft	0	0	0	0	0	0	0	0	0
Arson	0	0	0	0	0	1	0	0	0
*VAWA OFFENSES									
Domestic Violence	0	0	0	0	0	0	0	0	0
Dating Violence	0	0	0	0	0	0	0	0	0
Stalking	0	0	0	0	0	0	01	0	0
ARRESTS									
Weapon Law Violation	0	0	0	1	0	0	0	0	0
Drug Law Violation	0	0	0	0	0	0	0	0	0
Alcohol Law Violation	0	0	0	0	0	0	0	0	0
REFERRALS									
Weapon Law Violation	0	0	0	0	0	0	0	0	0
Drug Law Violation	0	0	0	0	0	0	0	0	0
Alcohol Law Violation	0	0	0	0	0	0	0	0	0

CRIME STATISTICAL REPORT: WORCESTER

QUINSIGAMOND COMMUNITY COLLEGE | 670 West Boylston Street - Main Campus

CRIME STATISTICS: CLERY DATA - The following annual security report provides crime statistics for selected crimes that have been reported to local police agencies or to campus security authorities. The statistics reported here generally reflect the number of criminal incidents reported to the various authorities. The statistics reported for the sub-categories on liquor laws, drug laws, and weapons offenses represented the number of people arrested or referred to campus judicial authorities for respective violations, not the number of offenses documented. This report complies with 20 U.S. Code Section 1092 (f). ***The College is a non-residential institution. The College has no unfounded crime reports withheld from the below crime statistics.**

OFFENCES	2024			2022			2023		
	On-Campus	Public Property	Non-Campus	On-Campus	Public Property	Non-Campus	On-Campus	Public Property	Non-Campus
HATE CRIMES									
Murder/Non-negligent Manslaughter	0	0	0	0	0	0	0	0	0
Negligent Manslaughter	0	0	0	0	0	0	0	0	0
Rape	0	0	0	0	0	0	0	0	0
Fondling	0	0	0	0	0	0	0	0	0
Incest	0	0	0	0	0	0	0	0	0
Statutory Rape	0	0	0	0	0	0	0	0	0
Robbery	0	0	0	0	0	0	0	0	0
Aggravated Assault	0	0	0	1G	0	0	0	0	0
Burglary	0	0	0	0	0	0	0	0	0
Motor Vehicle Theft	0	0	0	0	0	0	0	0	0
Arson	0	0	0	0	0	0	0	0	0
Larceny	0	0	0	0	0	0	0	0	0
Simple Assault	0	0	0	0	0	0	0	0	0
Intimidation	0	0	0	0	0	0	0	0	0
Vandalism	0	0	0	0	0	0	0	0	0
Hate Crime Key: (D) Disability (E) Ethnicity (Ra) Race (Re) Religion (S) Sexual Orientation (G) Gender (N) National Origin (Gi) Gender Identity									

CRIME STATISTICAL REPORT: SOUTHBRIDGE

QCC Southbridge High School Campus

CRIME STATISTICS: CLERY DATA - The following annual security report provides crime statistics for selected crimes that have been reported to local police agencies or to campus security authorities. The statistics reported here generally reflect the number of criminal incidents reported to the various authorities. The statistics reported for the sub-categories on liquor laws, drug laws, and weapons offenses represented the number of people arrested or referred to campus judicial authorities for respective violations, not the number of offenses documented. This report complies with 20 U.S. Code Section 1092 (f). ***The College is a non-residential institution. Southbridge location does not have Non-Campus Properties. The College has no unfounded crime reports withheld from the below crime statistics.**

OFFENCES	2024			2022			2023		
	On-Campus	Public Property	Non-Campus	On-Campus	Public Property	Non-Campus	On-Campus	Public Property	Non-Campus
Murder/Non-negligent Manslaughter	0	0	0	0	0	0	0	0	0
Negligent Manslaughter	0	0	0	0	0	0	0	0	0
Rape	0	0	0	0	0	0	0	0	0
Fondling	0	0	0	0	0	0	0	0	0
Incest	0	0	0	0	0	0	0	0	0
Statutory Rape	0	0	0	0	0	0	0	0	0
Robbery	0	0	0	0	0	0	0	0	0
Aggravated Assault	0	0	0	0	0	0	0	0	0
Burglary	0	0	0	0	0	0	0	0	0
Motor Vehicle Theft	0	0	0	0	0	0	0	0	0
Arson	0	0	0	0	0	0	0	0	0
*VAWA OFFENSES									
Domestic Violence	0	0	0	0	0	0	0	0	0
Dating Violence	0	0	0	0	0	0	0	0	0
Stalking	0	0	0	0	0	0	0	0	0
ARRESTS									
Weapon Law Violation	0	0	0	0	0	0	0	0	0
Drug Law Violation	0	0	0	0	0	0	0	0	0
Alcohol Law Violation	0	0	0	0	0	0	0	0	0
REFERRALS									
Weapon Law Violation	0	0	0	0	0	0	0	0	0
Drug Law Violation	0	0	0	0	0	0	0	0	0
Alcohol Law Violation	0	0	0	0	0	0	0	0	0

CAMPUS POLICE – EMERGENCY 4444

CRIME STATISTICAL REPORT: SOUTHBRIDGE

QCC Southbridge High School Campus

CRIME STATISTICS: CLERY DATA - The following annual security report provides crime statistics for selected crimes that have been reported to local police agencies or to campus security authorities. The statistics reported here generally reflect the number of criminal incidents reported to the various authorities. The statistics reported for the sub-categories on liquor laws, drug laws, and weapons offenses represented the number of people arrested or referred to campus judicial authorities for respective violations, not the number of offenses documented. This report complies with 20 U.S. Code Section 1092 (f). ***The College is a non-residential institution. Southbridge location does not have Non-Campus Properties. The College has no unfounded crime reports withheld from the below crime statistics.**

OFFENCES	2024			2022			2023		
	On-Campus	Public Property	Non-Campus	On-Campus	Public Property	Non-Campus	On-Campus	Public Property	Non-Campus
HATE CRIMES									
Murder/Non-negligent Manslaughter	0	0	0	0	0	0	0	0	0
Negligent Manslaughter	0	0	0	0	0	0	0	0	0
Rape	0	0	0	0	0	0	0	0	0
Fondling	0	0	0	0	0	0	0	0	0
Incest	0	0	0	0	0	0	0	0	0
Statutory Rape	0	0	0	0	0	0	0	0	0
Robbery	0	0	0	0	0	0	0	0	0
Aggravated Assault	0	0	0	0	0	0	0	0	0
Burglary	0	0	0	0	0	0	0	0	0
Motor Vehicle Theft	0	0	0	0	0	0	0	0	0
Arson	0	0	0	0	0	0	0	0	0
Larceny	0	0	0	0	0	0	0	0	0
Simple Assault	0	0	0	0	0	0	0	0	0
Intimidation	0	0	0	0	0	0	0	0	0
Vandalism	0	0	0	0	0	0	0	0	0
Hate Crime Key: (D) Disability (E) Ethnicity (Ra) Race (Re) Religion (S) Sexual Orientation (G) Gender (N) National Origin (Gi) Gender Identity									

CRIME STATISTICAL REPORT: Worcester

Center for Workforce Development and Continuing Education - 25 Federal Street Worcester MA

CRIME STATISTICS: CLERY DATA - The following annual security report provides crime statistics for selected crimes that have been reported to local police agencies or to campus security authorities. The statistics reported here generally reflect the number of criminal incidents reported to the various authorities. The statistics reported for the sub-categories on liquor laws, drug laws, and weapons offenses represented the number of people arrested or referred to campus judicial authorities for respective violations, not the number of offenses documented. This report complies with 20 U.S. Code Section 1092 (f). ***The College is a non-residential institution.**

The College has no unfounded crime reports withheld from the below crime statistics.

OFFENCES	2024			2022			2023		
	On-Campus	Public Property	Non-Campus	On-Campus	Public Property	Non-Campus	On-Campus	Public Property	Non-Campus
Murder/Non-negligent Manslaughter	0	0	0	0	0	0	0	0	0
Negligent Manslaughter	0	0	0	0	0	0	0	0	0
Rape	0	0	0	0	0	0	0	0	0
Fondling	0	0	0	0	0	0	0	0	0
Incest	0	0	0	0	0	0	0	0	0
Statutory Rape	0	0	0	0	0	0	0	0	0
Robbery	0	0	0	0	0	0	0	0	0
Aggravated Assault	0	0	0	0	0	0	0	0	0
Burglary	0	0	0	0	0	0	0	0	0
Motor Vehicle Theft	0	0	0	0	0	0	0	0	0
Arson	0	0	0	0	0	0	0	0	0
*VAWA OFFENSES									
Domestic Violence	0	0	1	0	0	0	0	0	0
Dating Violence	0	0	0	0	0	0	0	0	0
Stalking	0	0	0	0	0	0	0	0	0
ARRESTS									
Weapon Law Violation	0	0	1	0	0	0	0	0	0
Drug Law Violation	0	0	0	0	0	0	0	0	0
Alcohol Law Violation	0	0	0	0	0	1	0	0	0
REFERRALS									
Weapon Law Violation	0	0	0	0	0	0	0	0	0
Drug Law Violation	0	0	0	0	0	0	0	0	0
Alcohol Law Violation	0	0	0	0	0	0	0	0	0

CAMPUS POLICE – EMERGENCY 4444

CRIME STATISTICAL REPORT: WORCESTER

Center for Workforce Development and Continuing Education - 25 Federal Street Worcester MA

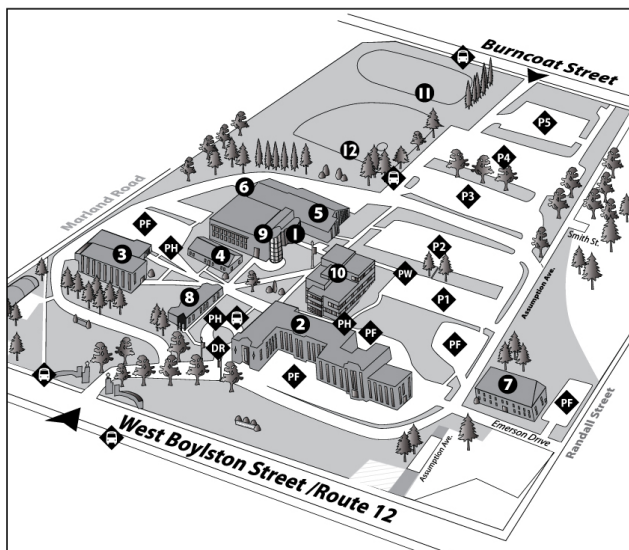
CRIME STATISTICS: CLERY DATA - The following annual security report provides crime statistics for selected crimes that have been reported to local police agencies or to campus security authorities. The statistics reported here generally reflect the number of criminal incidents reported to the various authorities. The statistics reported for the sub-categories on liquor laws, drug laws, and weapons offenses represented the number of people arrested or referred to campus judicial authorities for respective violations, not the number of offenses documented. This report complies with 20 U.S. Code Section 1092 (f). ***The College is a non-residential institution. The College has no unfounded crime reports withheld from the below crime statistics.**

OFFENCES	2024			2022			2023		
	On-Campus	Public Property	Non-Campus	On-Campus	Public Property	Non-Campus	On-Campus	Public Property	Non-Campus
HATE CRIMES									
Murder/Non-negligent Manslaughter	0	0	0	0	0	0	0	0	0
Negligent Manslaughter	0	0	0	0	0	0	0	0	0
Rape	0	0	0	0	0	0	0	0	0
Fondling	0	0	0	0	0	0	0	0	0
Incest	0	0	0	0	0	0	0	0	0
Statutory Rape	0	0	0	0	0	0	0	0	0
Robbery	0	0	0	0	0	0	0	0	0
Aggravated Assault	0	0	0	0	0	0	0	0	0
Burglary	0	0	0	0	0	0	0	0	0
Motor Vehicle Theft	0	0	0	0	0	0	0	0	0
Arson	0	0	0	0	0	0	0	0	0
Larceny	0	0	0	0	0	0	0	0	0
Simple Assault	0	0	0	0	0	0	0	0	0
Intimidation	0	0	0	0	0	0	0	0	0
Vandalism	0	0	0	0	0	0	0	0	0
Hate Crime Key: (D) Disability (E) Ethnicity (Ra) Race (Re) Religion (S) Sexual Orientation (G) Gender (N) National Origin (Gi) Gender Identity									

MAIN CAMPUS MAP - 670 WEST BOYLSTON STREET - CLERY REPORTING AREA

All visitors and those seeking Admissions should start at the Welcome Center

1. Welcome Center	4. Ahlfors Hall (ALF)
2. Administration Building (A)	Office of Distance Learning & Professional Development
Lower Level	5. Athletic Center (AC)
Bookstore Lower Level - A	Fitness Center
Business Office B07A	Gymnasium
Cafeteria Lower Level - A	Campus Police 136AC
Counseling & Wellness 56A	6. Campus Police 136AC
I.T. Service Desk B62A	7. Child Study Center (CSC)
First Floor	8. Fuller Student Center
Dental Hygiene Clinic 126A	Student Life
President's Office 132A	Wyvern Word Newspaper
Registrar 152A	Student Senate
TRIO Student Support Services 170A	9. Harrington Learning Center (HLC)
VP of Academic Affairs 103A	
VP of Strategic Enrollment Management & Student Engagement 133A	Second Floor - Student Success Center
Second Floor	Academic Advising
Student Accessibility Services 246A	Admissions
Veteran Affairs Office 258A	Financial Aid
Human Resources 222A	Subject Tutoring Center
Center for Career & Transfer Services 272A	Math Center
Third Floor	Writing Center
Dean of Students 365A	Third Floor
Placement Testing 376A	Alden Library
Harrington Academic Computing Center 379A	10. QuEST Center
Assistant Dean of Students 383A	Fab Lab 113Q
High School Equivalency Testing 384A	11. Athletic Field & Track
3. Surprenant Hall (S)	12. Chupka Baseball Field
Gateway to College 1025	
Hebert Auditorium	

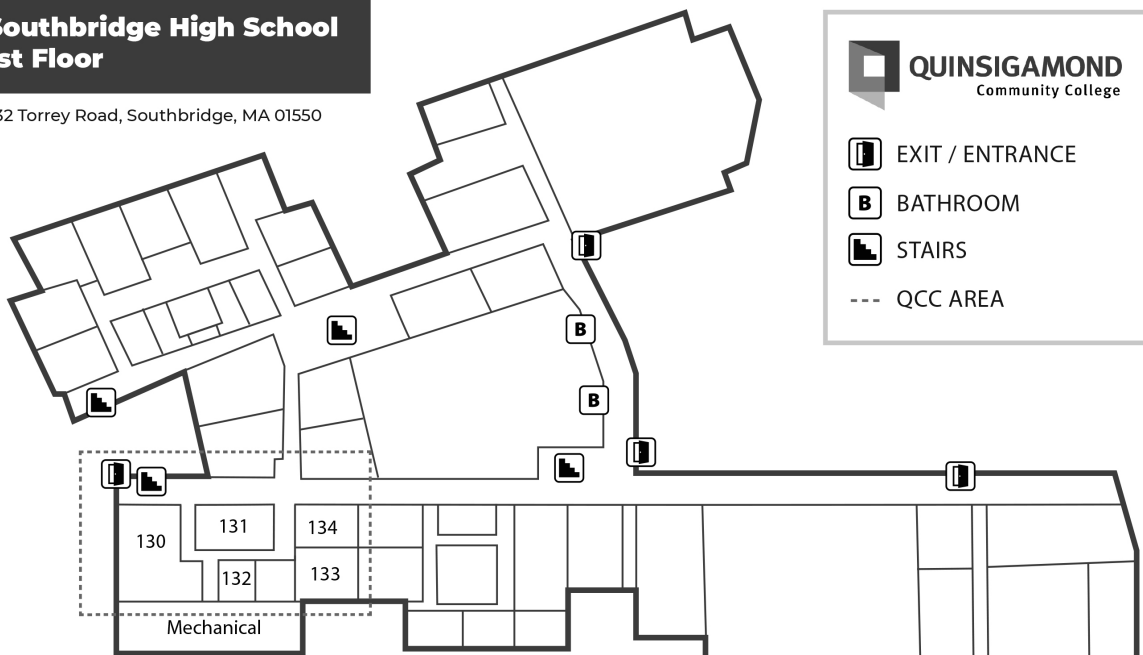


Parking	Class Locations - Main Campus	
DR Drop Off/Pickup	A Administration Building	HLC Harrington Learning Center
PW Welcome Center Parking	ALF Ahlfors Hall	Q QuEST Center
P1-5 Student & Visitor Parking	AC Athletic Center	S Surprenant Hall
PF Faculty & Staff Parking	CSC Child Study Center	
PH Handicapped Parking		
	Off-Campus Class Locations	
	BURN QCC at Burncoat	D Healthcare and Workforce Development Center
	CWDCE Center for Workforce Development and Continuing Education	QSB QCC at Southbridge
		SRCT QCC at the Worcester Senior Center

SOUTHBRIDGE CAMPUS MAP - 132 Torrey Road, SOUTHBRIDGE, MA - CLERY REPORTING AREA

Southbridge High School 1st Floor

132 Torrey Road, Southbridge, MA 01550



QUINSIGAMOND
Community College

- EXIT / ENTRANCE
- BATHROOM
- STAIRS
- QCC AREA

1. Healthcare and Workforce Development Center
2. Franklin Street Entrance
3. Federal Street Entrance
4. a. Shared Parking
b. QCC Parking
5. Hanover Theatre
6. Library Parking
7. Worcester Public Library
8. Worcester City Hall
9. Worcester Common
10. Federal Plaza Parking Garage



25 Federal Street