Unique Challenges in Responding to Allegations of Domestic Violence, Dating Violence, and Stalking

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Agenda

- Domestic violence, dating violence, and stalking statistics
- Defining domestic violence, dating violence, and stalking
- Unique challenges in responding to allegations of domestic violence, dating violence, and stalking
- Prevention and education



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Terminology

- DOE = Department of Education
- DCL = Dear Colleague Letter
- OCR = Department of Education's Office for Civil Rights
- VAWA = Violence Against Women Reauthorization Act
- FERPA = Family Educational Rights and Privacy Act
- CSA = Campus Security Authority
- Campus SaVE Act vs. VAWA vs. Clery Act
- Complainant/accuser/victim/survivor
- Respondent/accused/alleged perpetrator



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DOMESTIC VIOLENCE, DATING VIOLENCE, AND STALKING STATISTICS



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STATISTICS

- U.S. Department of Justice Study
  - Rates of intimate partner violence were highest for women between the ages of 18 and 24
  - Intimate partner violence accounted for 15% of all violent crime
    - the largest percentage (8%) was committed by current or former boyfriends or girlfriends
  - Only 34% of people who were injured by intimate partners received medical care for their injuries

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STATISTICS

- Knowledge Networks, Inc. Study
  - 57% of college students said it is difficult to identify dating abuse
  - 52% of college women reported knowing a friend who has experienced violent and abusive dating behaviors
  - 58% of college students said they don't know what to do to help someone who is a victim of dating abuse
  - One in three college students has given a dating partner their computer, email, or social network passwords

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STATISTICS

- Association of American Universities Survey:
  - 4% of students reported that they had been the victims of stalking since enrolling in college
  - Of students who reported experiencing stalking during college
    - 24% were stalked by someone the victim had dated or was intimate with
    - 40% were stalked by a friend or acquaintance
    - 29% were stalked by a stranger

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DEFINING DOMESTIC VIOLENCE, DATING VIOLENCE, AND STALKING



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SEXUAL ASSAULT

- Definition in VAWA:
  - Rape
  - Fondling
  - Incest
  - Statutory Rape



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Sexual Assault

- ***Rape***: The penetration, no matter how slight, of the vagina or anus with any body part or object, or oral penetration by a sex organ of another person, without the consent of the victim
- ***Fondling***: The touching of the private body parts of another person for the purpose of sexual gratification, without the consent of the victim, including instances where the victim is incapable of giving consent because of his/her age or because of his/her temporary or permanent mental incapacity

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Sexual Assault

- ***Incest***: Sexual intercourse between persons who are related to each other within the degrees wherein marriage is prohibited by law
- ***Statutory Rape***: Sexual intercourse with a person who is under the statutory age of consent



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Domestic Violence

- **VAWA Definition**:
  - Includes felony or misdemeanor crimes of violence committed—
    - By a current or former spouse or intimate partner of the victim
    - By a person with whom the victim shares a child in common
    - By a person who is cohabitating with or has cohabitated with the victim as a spouse or intimate partner
    - By a person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction receiving grant monies
    - By any other person against an adult or youth victim who is protected from that person's acts **under the domestic or family violence laws of the jurisdiction** in which the crime of violence occurred



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Dating Violence

- **VAWA Definition**:
  - Violence committed by a person who is or has been in a social relationship of a romantic or intimate nature with the victim
    - Where the existence of such a relationship shall be determined based on **the reporting party's statement and** with consideration of—
      - The length of the relationship
      - The type of relationship
      - The frequency of interaction between the person involved in the relationship



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Dating Violence

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



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Definition of Dating/Domestic Violence

- Include abuse beyond sexual or physical abuse or threats of such abuse?
  - Verbal, emotional, psychological abuse:
    - manipulative behavior
    - controlling behavior
    - verbal abuse



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STALKING

- **VAWA Definition**:
  - Engaging in a course of conduct directed at a specific person that would cause a reasonable person to—
    - Fear for his or her safety or the safety of others; or
    - Suffer substantial emotional distress



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STALKING

- **VAWA Definition** (cont.): For purposes of this definition—
  - ***Course of conduct*** means two or more acts, including, but not limited to, acts in which the stalker directly, indirectly, or through third parties, by any action, method, device, or means, follows, monitors, observes, surveils, threatens, or communicates to or about a person or interferes with a person's property



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STALKING

- **VAWA Definition** (cont.)
  - ***Reasonable person*** means a reasonable person under similar circumstances and with similar identities to the victim
  - ***Substantial emotional distress*** means significant mental suffering or anguish that may, but does not necessarily, require medical or other professional treatment or counseling



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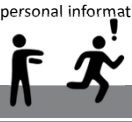
Stalking Examples

- Repeated, unwanted, and intrusive communications by phone, mail, text message, email, social media, or other means
- Repeatedly leaving or sending the victim unwanted items, gifts, or flowers
- Following or lying in wait for the victim at places such as home, school, work, or recreational facilities
- Making direct or indirect threats to harm the victim or the victim's children, relatives, friends, or pets
- Damaging or threatening to damage the victim's property
- Spreading rumors or repeatedly posting information about the victim on the internet, in a public place, or by word of mouth
- Unreasonably obtaining personal information about the victim



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Unique Challenges in Responding to Allegations of Domestic Violence, Dating Violence, and Stalking



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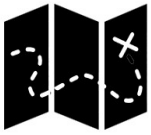
Unique Challenges

- Power dynamic
- Applying policy definitions: consent and coercion
- Third party reports and requests for no action
- Recantation
- Memorandums of understanding
- Safety concerns
- Working with law enforcement
- Cross complaints
- Volume of allegations and evidence
- Parties outside of campus community
- Other challenges in stalking cases



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Power Dynamic



https://www.theduluthmodel.org/wheel-gallery/

Analyzing Consent

- Consent may be more difficult to analyze for an allegation of nonconsensual sexual contact in a dating or domestic relationship
  - Ongoing relationship
  - Many encounters of a sexual nature over time
  - Parties may have established a pattern of sexual contact

Analyzing Consent

- Analysis dependent on policy definitions
  - Affirmative consent definition
    - Need words or actions, in advance, each time for each act
    - Not typical in ongoing, intimate relationship
  - Welcomeness + affirmative consent
    - Consider whether conduct was welcome
    - Clearest way to know if conduct was welcome is if the initiating party received consent through words
    - May also want to consider whether the conduct was reasonably interpreted to be welcome under the circumstances of the specific incident and within the context of the parties' relationship (*caution!*)
- Consider whether your institution's policy should be revised to include welcomeness

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COERCION

- United Educators study
  - For assaults occurring during a dating relationship, sexual coercion accounted for nearly 60% of claims
- Institutions have discretion in how they define coercion
  - Consider power dynamic
  - More than repeated requests?
  - More than pressuring?
  - "If you loved me, you'd do it"?
  - "If you don't do it, I'll break up with you"?
- Example of coercion:
  - Threatening to put naked photos on social media unless the victim engages in certain sexual acts



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THIRD PARTY REPORT

- May come from a witness to an incident, a family member, a friend, or an anonymous report
- Institution's response will depend on:
  - Source and nature of the information
  - Seriousness of the alleged incident
  - Specificity of information
  - Objectivity and credibility of the source of report
  - Whether individuals involved can be identified
  - Whether alleged victim wants to proceed with complaint resolution process
  - Whether alleged perpetrator has a history



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THIRD PARTY REPORT

- If institution can identify alleged victim, speak with that person, and determine if he or she wants to proceed with the process
- If institution cannot identify alleged victim, may not be able to reasonably investigate allegations
  - Still can take other measures to end, prevent, and address misconduct, such as offering training or other systemic measures

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Requests for No Action

- If able to identify alleged victim and individual asks that no investigation or disciplinary action be pursued:
  - Inform the alleged victim that honoring the request may limit the school's ability to respond fully to the incident, including pursuing disciplinary action against the alleged perpetrator
  - Explain that Title IX includes protections against retaliation and that school officials will not only take steps to prevent retaliation, but also take strong responsive action if it occurs

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Requests for No Action

- If alleged victim still requests no action:
  - Determine whether the school can honor such a request while still providing a safe and nondiscriminatory environment for all members of the community, including the alleged victim



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Requests for No Action

- Factors to consider:
  - Seriousness of the alleged harassment
  - The age of the alleged victim
  - Whether there have been other complaints or reports of harassment against the alleged harasser
  - Rights of the accused individual to receive information about the accuser and the allegations if a formal proceeding with sanctions may result
  - Whether school has other means to obtain evidence (third party reporter?)



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Requests for No Action

- If school determines it can respect the request
  - Take all reasonable steps to respond to the report consistent with the request
  - Limit effects of the conduct and prevent recurrence, consider whether to:
    - Encourage victim to report to law enforcement
    - Inform victim about legal options including obtaining an order for protection or harassment restraining order
    - Refer alleged victim to support services including counseling and local domestic violence program
    - Assist alleged victim in developing a safety plan
    - Encourage alleged victim to keep records of conversations with alleged perpetrator and to write down the details of any incidents of abuse including the date and time
    - Provide increased monitoring, supervision, or security at location/activities where misconduct occurred
    - Provide training/education materials to community
    - Change or publicize the school's policies and procedures
    - Conduct climate surveys



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Requests for No Action

- If the school determines it cannot honor the request for no action
  - Inform the alleged victim prior to making the disclosure to the alleged perpetrator
  - Take whatever interim measures are necessary to protect the alleged victim
  - Honor any request from the alleged victim that that perpetrator be informed that the alleged victim asked the school not to investigate or seek discipline
  - Commence investigation

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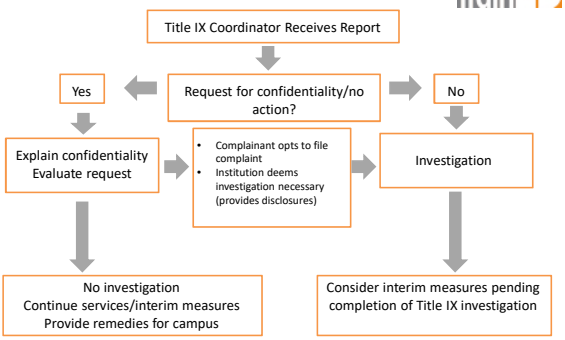
Responding to a Report



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Recantation/Lack of Participation

- Alleged victims may regret reporting intimate partner abuse
  - Pressure from partner
  - Pressure from friend groups
  - Fearful of consequences and other retaliation



- Recantation should not automatically trigger an end to an investigation
- If victim is suddenly not responding, may need to confirm the victim's safety

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MOU

- Formation of partnerships between the school and community to provide victims access to a comprehensive, coordinated network of service providers – medical, psychological, advocacy, legal and safety
- Consider MOU with local sexual violence and domestic violence programs
  - May help with crisis counseling, legal advocacy, medical advocacy, housing, and employment

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Ongoing Safety Threat

- Complainant may be at increased risk after reporting
  - Assess complainant's possible monetary dependence, complainant's access to shelter and personal property, respondent's knowledge of complainant's location and routines, other concerns raised by complainant
- Work with campus safety, threat assessment and management team, and/or behavioral intervention team to evaluate and mitigate safety risks
  - Consider safety risks to complainant and others prior to issuing no contact directive
  - Ensure that those involved outside of the Title IX team understand Title IX/VAWA obligations



- Consider respondent's safety, too
  - Risk of destructive behavior, including self-harm?

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Safety Planning

- Encourage complainant to:
  - Carry cell phone and important telephone numbers at all times
  - Keep in touch with a friend or family member about complainant's location
  - Avoid isolated places and places where respondent is likely to be
  - Keep dorm/apartment/house doors and windows locked
  - Call 911 if complainant feels he or she is in danger
  - Write down details of any encounters with respondent
- Interim measures
  - Campus security escorts or other safety escort service to walk with complainant around campus
  - Other transportation options such as a campus shuttle
  - Changes to academic or work schedule, housing, parking

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Working with Law Enforcement

- May temporarily delay complaint resolution process for initial police investigation
  - Depending on MOU, investigator may be able to get information from the police investigation
- May not delay for criminal prosecution
- Orders for protection and harassment restraining orders
  - Institution is required to enforce OFPs and HROs
  - Consider how an OFP or HRO will affect your process
    - Change to interim measures/no contact directive?
    - Considered as evidence in adjudication?

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Cross Complaints

- More frequent in recent years
- Follow institution's policy
- Without "smoking gun" do not assume second complaint is retaliation



- Each allegation should be treated as a distinct potential policy violation
  - Possible that both are found not responsible, that both are found responsible, or that one is found responsible and the other is not

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Volume of Allegations

- May include many allegations that occurred over long time period and numerous separate incidents
- Can be challenging to ensure that the parties receive written notice of the allegations
- Investigation strategies
  - Consider a chart or checklist to track allegations and whether you have asked questions of each party related to the elements of each allegation
  - Be thoughtful about interview schedule
- Adjudication considerations
  - Be consistent in treatment of allegations
  - Consider context of relationship (*caution!*)



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Volume of Evidence

- If many allegations that occurred over long time period and/or numerous separate incidents, investigation may include significantly more evidence
  - Text messages
  - Social media
  - Emails
  - Letters
  - Photos
- Consider relevancy of:
  - Witnesses to the parties' interactions during the relationship
  - Other evidence related to the context of the parties' relationship
  - Mental health evidence
  - Medical evidence
  - Interviews of family members



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Word Limits

- Word limits for party response statements and rebuttals may need to be extended
  - Multiple incidents over time
  - Context of relationship
  - Cross complaint
  - Longer investigation reports and more exhibits
- If extending word limit, do so equally for both parties
- Extend response time, too?
  - Recommended in cross complaint cases
- Make sure there is flexibility built into the policy



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Parties Outside of Community

- Limited ability to sanction someone outside of your campus community accused of misconduct
- May ban the person from campus
- Engage in formal complaint resolution process?
  - Consider whether person has any legitimate need to come to your campus (alumni, member of community outside of the campus, etc.)
- Offer interim measures and remedies to complainant

Other Challenges in Stalking Cases

- To make determination of policy violation - need to consider impact on complainant
  - Consider institution's definition of stalking – fear for safety or substantial emotional distress
  - Look at effects on complainant's mental and emotional health, physical health, work, school, and social life
    - A complainant may change his or her everyday routine to avoid seeing respondent
- Interim measures may be different for stalking cases
  - No contact directive should not inform respondent of complainant's location or routine
- Safety concerns
  - Complainant may need to vary routine
  - Consider informing supervisor, RA, other campus officials of respondent's identity and the terms of the no contact directive
  - Safe use of technology

Technology and Stalking

- Technology has made stalking easier
  - Spying and eavesdropping
    - Mobile devices include call records, texts, web surfing, and physical location histories
    - Social media sites may track a user's location
    - Students may share significant details over social media
    - Spy apps allow a perpetrator to see virtually all use of a victim's cell phone
  - Unwanted communication
    - Easy through social media, text messages, other apps
  - Ability to hide identity
    - Apps allow user to send text messages from fake number or anonymously
    - Social media accounts
    - Anonymous email accounts
  - Posting intimate photos and videos
  - Spreading rumors through social media



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Technology Evidence

- Talk to parties early in the process about preserving text messages, social media messages and posts, phone records, emails, photos and videos
- Consider whether other evidence from technology may be useful
  - Wi-Fi access point records
  - Access card records
  - Surveillance footage



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Prevention and Education



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Education on Relationships

- Educate on scale from healthy to unhealthy to abusive relationships
- Encourage healthy relationships
- An unhealthy relationship is not necessarily a violation of the sexual misconduct policy
  - Educate on warning signs, but recognize that not every unhealthy relationship is abusive
- Include education on how to help a friend in an unhealthy or abusive relationship

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Education on Relationships

- Example warning signs:
  - Isolating victim from friends and family
  - Controlling what victim wears
  - Preventing victim from participating in extracurricular activities
  - Controlling victim's academic schedule
  - Pressuring victim into sexual conduct he or she is not comfortable with
  - Constant calling or texting to check up on victim
  - Manipulative behavior
  - Belittling
  - Making victim feel guilty or responsible for partner's actions
  - Unpredictable overreactions
  - Damaging property when he or she is angry
  - Controlling victim's smart phone and access to victim's email and online accounts



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One Love Foundation Memes





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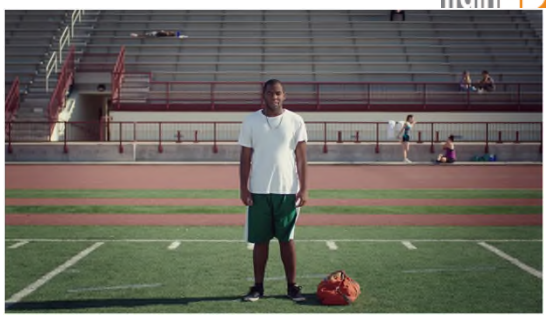

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Education on the Safe Use of Technology

- Use passwords
  - Change passwords following a breakup
- Consider your social media and phone privacy settings
- Do not provide detailed information on social media sites
- Protect phones and computers from spyware
  - Notice if something strange is happening on a cell phone (the battery is draining too quickly, etc.) – may be a signal that spyware has been installed
- Block phone numbers and social media accounts of others if necessary

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Bystander Training

- Bystander intervention training
  - Encourage anyone in an abusive relationship to seek professional help
  - Think about your own safety before intervening
    - If possible, calmly try to separate the individuals without putting yourself in danger
  - If the violence becomes physical, call 911
- Stepupprogram.org scenarios
  - A friend pushes and then slaps his girlfriend at a party. Other people see it and are upset but don't do anything. He's not a very close friend, but someone you've taken several courses with and have had cordial discussions. What do you do?

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Upcoming Trainings

- **4/12/18: Title IX/VAWA Training for Senior Leadership**
- **5/10/18: Trauma Informed Training for First Responders, Confidential Resources and Campus Security**
- **7/23/18: Annual Training for Advanced Title IX Coordinators and Deputy Coordinators**
- **7/24/18: Annual Title IX/VAWA Investigator and Adjudicator Training**
- **8/6/18: Annual Training for New Title IX Coordinators & Deputy Coordinators**
- **8/7/18: Annual Training for Advanced Title IX Coordinators and Deputy Coordinators**
- **8/8/18: Annual Title IX/VAWA Investigator and Adjudicator Training**

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