



Northwestern
University

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BEHAVIORAL CONSULTATION TEAM

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Policy Statement

Northwestern is committed to maintaining an environment where people feel safe to carry out the University's mission and does not tolerate acts or threats of violence committed by or against members of its community. This policy outlines the University's behavioral threat assessment process and the role of the Behavioral Consultation Team (BCT or Team), both of which are dedicated to the prevention, reduction, mitigation, and management of acts or credible threats of violence.

Purpose

Northwestern's BCT provides education, communication, collaboration, coordination of resources, and early intervention to maximize violence prevention efforts. The BCT conducts threat assessments; addresses aberrant, dangerous, or threatening behavior that might adversely affect the safety or well-being of the campus community; gives guidance and best practices for preventing violence; and provides

supportive services through holistic case management of situations brought to the team's attention. [Illinois law](#) requires all institutions of higher education to develop and implement campus threat assessment teams. This policy formalizes the University's behavioral threat assessment process.

Audience

All members of the Northwestern University community, including staff, faculty, students, visitors, or other third parties on campus, as defined below.

Definitions

Behavioral Consultation Team (BCT or Team): a multidisciplinary team comprising representatives from departments across the University, including Northwestern Police, Dean of Students Office, Office of Human Resources, Counseling and Psychological Services (CAPS), Office of Equity, Office of the Provost, and Office of General Counsel. The team is responsible for conducting threat assessment for referrals made to it concerning acts or credible threats of violence. The team also assesses concerning or potentially disruptive behavior referred to it.

Behavioral Threat Assessment: the identification, review, and monitoring of any Northwestern student, staff, faculty, or other third party about whom concerns have been raised related to threats of harm to self or others or who has exhibited other concerning behaviors that significantly disrupt the campus learning or work environment.¹

Credible threat of violence: a statement or course of conduct that would cause a reasonable person to fear for their safety or for the safety of others at the person's workplace.

On campus: on University-owned, -controlled, or -leased properties, or in connection with University events or programs.

Prohibited behaviors: see [Section V](#) below.

Policy Implementation

I. *Violence-Free Workplace*

Northwestern is a violence-free workplace. The University does not tolerate acts or threats of violence committed by or against staff, faculty, students, visitors, or other third parties on University-owned, -controlled, or -leased properties or in connection with University events or programs. As outlined in Northwestern's [Campus Violence Prevention Plan](#), all useful management strategies will be employed to identify and prevent incidents of campus violence in order to reduce the effects of violence or the threat of violence, whether self-directed or aimed at others, and to address and respond to those who threaten or perpetrate violence.

¹ Definition adapted from Deisinger, G., Randazzo, M., O'Neill, D., & Savage, J. (2008). *The Handbook for Campus Threat Assessment & Management Teams*.

II. *Mission and Guiding Principles*

A. The Northwestern BCT supports the comprehensive violence prevention strategies of the University by:

- Serving as a central point of contact for receiving community concerns regarding threatening or concerning behavior;
- Conducting threat assessment and implementing intervention actions;
- Assessing the type of threat and level of risk; and
- Providing educational programming to the University community relative to identifying and reporting threatening and concerning behavior.

B. Guiding Principles

- The safety of individuals and the Northwestern community is the primary focus of the team and a shared goal of all members of the community.
- The team is not a substitute for emergency response to an active or imminent threat to the safety of the University community.
- Communication, coordination of resources, and timely response is critical to team performance.
- A fact-based, analytical approach will guide the decision-making process of the team.
- The team will establish or utilize existing collaborative relationships with local, state, and federal law enforcement and other local and institutional resources as necessary in order to expedite assessment and intervention with individuals whose behaviors may present a threat.
- The team will treat all persons fairly, with dignity and respect.
- The team will address and manage impact to individuals, groups, and the community.

III. *Team Members*

The BCT is a multi-disciplinary team composed of individuals from departments across the University. The core team meets regularly during the calendar year for case and policy review. The team also meets as needed to address situations that may require immediate attention. Representatives from the departments below constitute the core BCT:

- Counseling and Psychological Services (CAPS)
- Dean of Students Office
- Office of Human Resources
- Northwestern Police
- Office of Equity
- Office of General Counsel
- Office of the Provost
- Residential Services

From time to time there is a need to enlist additional subject matter experts to participate in BCT-related matters. Many of those enlisted serve in direct support of students within the undergraduate and graduate schools throughout Northwestern. The list below provides examples of additional departments that may be called upon to serve as a consultant or ad hoc member of the team. The list is not exhaustive.

- Accessible NU
- International Office
- Northwestern Athletics
- Risk Management
- Student Affairs
- Global Marketing and Communications
- Executive Vice President

For additional details regarding the BCT's make-up as well as team member roles and responsibilities, see [Appendix A](#).

IV. *Reporting Concerns*

Members of the Northwestern community, including faculty, staff, and students, are expected to report concerning and threatening behavior immediately. Community responsibility and engagement in the reporting process enhances campus safety and the ability to effectively respond to potentially dangerous situations.

Community members should report violent, potentially violent, and threatening behavior to one or more of the following individuals or offices:

- one's supervisor, faculty member, or administrator; or
- the Behavioral Consultation Team, by contacting Northwestern Police, Director of Threat Assessment (see "Contacts" section below for additional information).

Non-emergency related concerns can be reported by contacting the Director of Threat Assessment.

Community members who prefer to report anonymously may do so by utilizing the [Wildcats Aware: Concerning Behavior Reporting Form](#).

Northwestern prohibits filing knowingly false claims or information.

To report an emergency that requires immediate attention, please contact University Police at (847) 491-3456 or by dialing 911.

Community members who have a protective order or restraining order that would cover them on campus are strongly encouraged to provide a copy of the order to Northwestern Police (see "Contacts" section below for additional information).

V. *Prohibited Behaviors*

Prohibited acts of campus violence include, but are not limited to, the following acts, when occurring on campus or potentially affecting a member of the campus community while they are on campus (see definition of "on campus" above):

- destroying, damaging, defacing, or vandalizing property;
- engaging in any action (or threat of action) that endangers or threatens to endanger the health, safety, or wellbeing of any person (including oneself);

- stalking (as defined in Northwestern's [Policy on Sexual Misconduct](#));
- dating/domestic violence (as defined in Northwestern's [Policy on Sexual Misconduct](#)); or
- engaging in other violent or threatening behavior.

Violent or threatening behavior may consist of physical acts, oral or written statements, harassing email messages, harassing telephone calls, gestures, or other behaviors that a reasonable person would perceive to be threatening to either the physical or psychological well-being of the individual. Such behavior includes self-directed as well as other-directed violence or threat of violence.

Threats are unacceptable regardless of whether the person communicating the threat has the ability to carry them out, whether the threat is made on a present, conditional, or future basis, or whether the threat is made in person, through another person, in writing, over the phone, in the mail, or electronically.

VI. *Identifying Concerning Behaviors*

The following example behaviors may indicate that a person may be distressed and concerning to the campus community. The behaviors listed below are not an exhaustive list.

- Exhibiting behavior that can reasonably be interpreted as threatening to self or others.
- Explicitly making a threat of violence to another individual.
- Exhibiting highly disruptive behavior, including hostile, aggressive, bullying, intimidating, and/or violent behaviors.
- Being cited, arrested for, or under investigation for a violent or threatening offense.
- Continuing to pursue options that do not reasonably exist after being instructed to cease (e.g., a student continues to pursue a grading complaint after being informed all administrative procedures have been exhausted, or a staff member persists in pursuing a reversal of a sanction after exhausting the established appeal process).
- A member of the campus community expressing concern for the member's own personal safety.

VII. *Retaliation*

The University's [Policy on Non-Retaliation](#) prohibits retaliation against any member of the Northwestern community for registering, in good faith, a concern with the BCT; assisting another in registering a concern; or participating in a BCT assessment process. Community members may report evidence of suspected retaliation by contacting any of the individuals or offices listed in the policy, or by submitting a report through [EthicsPoint](#), the University's phone- and web-based system for confidential reporting of suspected misconduct.

VIII. *Confidentiality*

Reports of threatening behavior made to the BCT will be handled as discreetly as possible, with facts made available only to those who need to know to assess and properly intervene in the matter. Please note, however, that disclosure of threatening behavior may be necessary to protect the health and safety of the Northwestern community, or as otherwise required by law. Information may be provided to emergency response personnel, police, parents and family members, third party forensic assessment organizations, or, in extreme circumstances, the entire Northwestern community, among others.

Consequences of Violating this Policy

Individuals who are found to have engaged in prohibited behaviors or acts of retaliation against reporting persons may be subject to discipline under University policies and procedures, up to and including termination of employment or dismissal from the University.

Related Information

[Behavioral Consultation Team webpage](#)

[Campus Violence Prevention Plan](#)

[Illinois Campus Security Enhancement Act](#)

[Illinois Workplace Violence Prevention Act](#)

[Northwestern Policy on Non-Retaliation](#)

[Northwestern Policy on Sexual Misconduct](#)

[Northwestern Student Code of Conduct](#)

[Wildcats Aware: Concerning Behavior Reporting Form](#)

Contacts

The following individuals can address questions regarding this Policy:

1. Northwestern Police, Director of Threat Assessment, Michelle Hoy-Watkins, PsyD, phone: (847) 467-5375, email: mhoy@northwestern.edu.
2. Northwestern Police, Associate Vice President and Chief of Police, Bruce Lewis, phone (847) 491-4933, email: balewis@northwestern.edu.

To report concerning or threatening behavior, contact Northwestern Police, Director of Threat Assessment, Michelle Hoy-Watkins, PsyD, phone: (847) 467-5375, email: mhoy@northwestern.edu (see also [Section IV](#)).

To provide notice of a protective or restraining order, contact Northwestern Police, at (847) 491-3456.

To report an emergency that requires immediate attention, contact Northwestern Police at (847) 491-3456 or by dialing 911.

History

Supersedes original policy adopted June 2009.

Policy URL:

<http://policies.northwestern.edu/docs/bct-policy-final.pdf>

Appendix A: Team Member Roles and Responsibilities

The BCT is a multi-disciplinary team composed of individuals from various departments. The sections below outline the core members of the team, team consultants, and ad hoc members who may be called upon by the Team in specific situations.

- I. *Core Members:* Core members (or their designees) are encouraged to attend all meetings when possible.

Director of Threat Assessment: Chair
Associate Vice President & Chief of Police
Executive Director of Counseling & Psychological Services (CAPS)
Associate Vice President & Dean of Students (DOS) for Evanston Campus
Assistant Dean of Students & Director of Student Conduct (formerly Judicial Affairs)
Senior Associate Dean of Students
Associate Vice President for Human Resources
Academic Affairs/Provost representative
Technical Services Assistant
Associate Vice President for Equity
Associate General Counsel
Executive Director of Residential Services

- II. *Ad Hoc Members:* From time to time there is a need to enlist additional subject matter experts to participate in BCT-related matters. The list below provides examples of additional departments that may be called upon to serve as a consultant or ad hoc member of the team. The list is not exhaustive.

- Accessible NU
- International Office
- Northwestern Athletics
- Risk Management
- Vice President of Student Affairs
- Global Marketing and Communications
- Executive Vice President

- III. *Team Member Roles/Responsibilities*

A. *Core Members*

- **Director of Threat Assessment (DOTA):** The Director of Threat Assessment serves as the team Chair. The Chair also articulates the team consensus for assessment and intervention in specific situations. The DOTA provides leadership and coordinates the BCT's case management related to assessing threats to the personal safety of students or other community members. The DOTA oversees case management and coordinates the formulation, determination, and implementation of threat response plans. The DOTA will develop and coordinate training on issues related to threat assessment and provide outreach, education, and resources to the campus community.

- Associate Vice President & Chief of Police (or designee): The AVP/Chief of Police (or designee) coordinates law enforcement-related investigative actions with both internal and external law enforcement agencies. Examples of these actions are background investigations, ascertaining orders of protection, and providing liaison services with other police departments, courts, and correctional facilities.
- Executive Director of CAPS (or designee): CAPS provides consultation regarding mental health issues and how they relate to the specific case. CAPS also coordinates and provides follow-up with outside mental health agencies and clinicians for possible referrals/consultations with those services. In most cases, the CAPS representative will be the Executive Director of CAPS, unless there is a conflict of interest in relation to the specific individual being discussed. The CAPS representative should not be in a treatment relationship with the person who is a focus of the BCT, so as to avoid conflict of interest and confidentiality issues.
- Associate Vice President & Dean of Students (DOS) for Evanston Campus: The DOS coordinates the acquisition and distribution of information related to students, provides background information regarding enrollment status, and may be the first point of contact with the student. The DOS may serve as a liaison to parents and families and makes recommendations about calling in ad hoc team members from specific schools as needed.
- Assistant Dean & Director of Student Conduct (DSC): The DSC interprets the Student Code of Conduct and other student-related policies. The DSC may also provide student conduct background that may be relevant for team deliberations (e.g., previous disciplinary or conduct issues).
- Technical Services Assistant: The technical services assistant takes notes of BCT meetings, prepares meeting minutes, and serves as the custodian of team records.
- Senior Associate Dean of Students: The Senior Associate Dean of Students provides support and assistance to the DOS and DSC in all of their team responsibilities and may perform any of the duties identified for those positions.
- Office of Human Resources (HR) Representative: The HR representative may provide employee information and records to the BCT when there is a staff member who is being assessed by the team and help interpret policies related to employees. HR will also typically coordinate contact with the staff member(s) and serve as a liaison to departments and schools regarding BCT staff concerns as necessary.
- Provost Office Representative: This team member provides information and records to the BCT when there is a faculty member who is being assessed by the team. The Provost Office representative assists the team in interpreting academic policies and procedures and makes recommendations about calling in ad hoc team members from specific schools, when needed. The Provost Office Representative will also typically coordinate contact with the faculty member(s) and serve as a liaison to departments and schools regarding BCT-related faculty concerns as necessary.
- Associate Vice President of Equity: This representative will provide relevant background on cases related to discrimination and harassment (including sexual misconduct).

- OGC Representative: The OGC representative provides consultation to the BCT regarding compliance with relevant laws and policies.
 - Executive Director of Residential Services: This team member provides information and records to the BCT when there is a residential student who is being assessed by the team. The Residential Services representative assists the team in interpreting policies and procedures and making recommendations and/or accommodations relative to University Housing.
- B. *Ad Hoc Members.* Other members of the Northwestern community may be called upon to provide information/consultation to the BCT, as needed.