



Northwestern
University

Approving University Officials: Chief Operating Officer
Responsible Office: NU Department of Safety and Security
Effective date: September 2024
Next review date: August 2027

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 threats or acts 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 threats and those who may pose them.

Purpose

The BCT at Northwestern engages in a systematic, fact-based process of threat assessment using current best practices, including early identification of concerning behavior, multi-disciplinary collaboration and coordination of resources, intervention and management strategies, and training to maximize violence prevention efforts. The BCT assesses threatening, seriously disruptive, or other concerning behaviors that might pose a risk of violence or otherwise adversely affect the safety or wellbeing of the campus community.

[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 team and 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 comprised of representatives from departments across the University, including Northwestern Police, Dean of Students Office, Office of Human Resources, Counseling and Psychological Services (CAPS), Office of Civil Rights and Title IX Compliance, Office of the Provost, and Office of General Counsel that is responsible for assessing threatening, significantly disruptive, or other concerning behavior, based upon referrals it receives from the campus community as well as additional information gathered by members of the Team. The Team may develop and implement intervention and management strategies to reduce a potential risk or threat.

Behavioral Threat Assessment: A systematic, fact-based process that combines the collection and analysis of multiple sources of information with existing research, practitioner training/experience, and ultimately their judgement, that focuses on the thinking and behavior of a person of concern to determine whether that person is moving toward an act of targeted or intended violence.¹ It is of equal importance to support the safety and well-being of those who may be affected by the situation.

Credible threat of violence: A statement or course of conduct that would cause a reasonable person to fear for their safety and/or the safety of others at a location of significance to that person.

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

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 business, events, or programs conducted through all modalities. 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 Amman, Molly, Matthew Bowlin, Lesley Buckles, Kevin C. Burton, Kimberly F. Brunell, Karie A. Gibson, Sarah H. Griffin, Kirk Kennedy, and Cari J. Robins, *Making Prevention a Reality: Identifying, Assessing, and Managing the Threat of Targeted Attacks*, Washington, D.C.: Federal Bureau of Investigation, National Center for the Analysis of Violent Crime, Behavioral Analysis Unit, November 2016.

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 and responding to community concerns regarding threatening, seriously disruptive, or concerning behavior;
- Obtaining further information about those situations involving threatening or concerning behavior and the context in which it occurs
- Assessing threatening or concerning behavior, including the credibility, nature and severity of a threat, the level of concern, and whether others are seriously affected by those threatening or concerning behaviors.
- Considering, deciding upon, and implementing interventions designed to reduce or eliminate threatening or concerning behavior as well as supporting and enhancing the safety and well-being of those affected by the threatening or concerning behavior. The BCT may identify resources internal and/or external to Northwestern to work in conjunction on implementation strategies.
- Educating and engaging with the University community to support early identification and reporting of threatening, seriously disruptive, or 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 are 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 to expedite assessment and intervention with individuals whose behaviors may present a threat.
- The Team will treat all persons fairly, with dignity and respect.

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 (or their designee) from the departments below constitute the core BCT:

- Director of Behavioral Consultation Programs
- NUPD
- Counseling and Psychological Services
- Dean of Students
- Human Resources
- Office of the Provost
- Office of Civil Rights and Title IX Compliance
- Office of General Counsel
- 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, staff, or faculty 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
- Student Affairs
- Global Marketing and Communications
- Cyber Security
- Office for Research (Safety/Security)
- Faculty Wellness
- Risk and Compliance
- Other applicable campus resource

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

IV. *Reporting Concerns and Cooperation with BCT*

Members of the Northwestern community, including students, faculty, staff, affiliates, and non-affiliates, are expected to immediately report behavior that is concerning, threatening, or significantly disruptive to persons or property on or associated with Northwestern. Community responsibility and engagement in the reporting process enhances campus safety and the ability to effectively prevent or respond to potentially dangerous situations.

All university employees (faculty, staff, and affiliates) and students must cooperate with requests from the BCT, as directed, in connection with its violence prevention and response missions.

Individuals who wish to report a non-emergency concern or who prefer to report information anonymously may do so by submitting a [Wildcats Aware: Concerning Behavior Reporting Form](#).

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

Northwestern University prohibits filing knowingly false claims or information.

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

V. *Behaviors That Could Prompt BCT Activation*

Behaviors that could prompt activation of the BCT include violent, threatening, or concerning behaviors which may consist of physical acts, oral or written statements, harassment that utilizes any electronic format or platform, gestures, or other behaviors that a reasonable person would perceive to be threatening or concerning with respect to either the physical or psychological well-being of the individual or another. Concerning behaviors could include those that are not perceived

to be immediately threatening to the safety of the community, but that may cause others distress and to consider sharing the information, particularly with someone in authority.

Communication of a threat through any means, regardless of whether the person doing so has the ability or intent to carry it out, whether the threat is made directly, indirectly, conditionally, in a veiled manner, or through another person or proxy, is likely to prompt BCT activation if reported.

Engagement in the behaviors including but not limited to the following could prompt activation of the BCT when such behavior occurs on campus or potentially affects 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](#)).

The following documents contain information pertaining to conduct of Northwestern University community members:

[Office of Civil Rights and Title IX Compliance](#)
[Community Standards: Prohibited and Restricted Conduct](#)
[Policy on Discrimination, Harassment, and Sexual Misconduct](#)
[Staff Handbook](#)

VI. Identifying Concerning Behaviors

The following example behaviors may indicate that a person is distressed and of concern to the campus community. The behaviors listed below are not exhaustive.

- Exhibiting behavior that can reasonably be interpreted as threatening to self or others.
- Making known a grievance, grudge, or sense of being wronged, followed by words or actions that indicate a desire for revenge or recognition for "making things right," possibly through violence.
- Communicating ideas or intentions that support or justify the use of violence to address grievances or problems; or having exhausted (or not considered) non-violent alternatives to problem-solving or a willingness to accept the consequences of engaging in dangerous or violent behavior.
- Explicitly making a threat of violence to another individual or to oneself.
- Exhibiting significantly disruptive behavior, including hostile, aggressive, bullying, and/or violent behaviors.
- Threatening, menacing, harassing, or stalking.
- 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 and that cause safety concerns among those involved (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).

- Drug and/or alcohol abuse that directly increases the likelihood of or is concurrent with the other behaviors mentioned above.

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 [Ethics Point](#) 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 or University policy. Reports of behavior involving discrimination, harassment, or sexual misconduct are required by law and University policy to be reported.

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

Any sanctions for individuals engaging in behaviors that would activate the BCT would be managed under the applicable Handbook or Policy.

Related Information

[Behavioral Consultation Program website](#)

[Campus Violence Prevention Plan](#)

[Illinois Campus Security Enhancement Act](#)

[Illinois Administrative Code - Campus Threat Assessment Team](#)[Northwestern Policy on Non-Retaliation](#)

[Northwestern Policy on Discrimination, Harassment, and Sexual Misconduct](#)

[Northwestern Interim Policy on Title IX Sexual Harassment](#)

[Northwestern Student Code of Conduct](#)

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

Contacts

The following individuals can address questions regarding this Policy:

- Northwestern University, Director of Behavioral Consultation Programs.
- Northwestern University Police, Deputy Chief of Police.

To report concerning or threatening behavior, submit a [Wildcats Aware: Concerning Behavior Reporting Form](#). (see also [Section IV](#)).

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

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

History

Supersedes policy revision dated February 2018. Original policy was adopted June 2009.

Policy URL:

<https://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 designee) are encouraged to attend all meetings when possible.

- Director of Threat Assessment
- NUPD
- Counseling and Psychological Services
- Dean of Students
- Human Resources
- Office of the Provost
- Office of Civil Rights and Title IX Compliance
- Office of General Counsel
- 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
- Student Affairs
- Global Marketing and Communications
- Cyber Security
- Office of Research (Safety/Security)
- Faculty Wellness
- Risk and Compliance
- Other applicable campus resources

III. *Team Member Roles/Responsibilities*

A. *Core Members*

- Director of the Behavioral Consultation Team: The Director of Behavioral Consultation serves as the team Chair and articulates the team consensus for assessment and intervention in specific situations. The Director provides leadership and coordinates the BCT's case management related to assessing threatening or concerning behaviors. The Director coordinates the formulation, determination, and implementation of threat response plans. The Director develops and coordinates training on issues related to threat assessment and provides outreach, education, and resources to the campus community.

- NUPD: NUPD 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, safety planning for victims or persons targeted for harm, and providing liaison services with other police departments, courts, and correctional facilities.
- Counseling and Psychological Services (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, to avoid conflict of interest and confidentiality issues.
- Dean of Students (DOS): 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.
- Human Resources (HR): 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.
- Office of the Provost: 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.
- Office of Civil Rights and Title IX Compliance: This representative will provide relevant background on cases related to discrimination and harassment (including sexual misconduct) and facilitate support and assistance for those affected.
- Office of General Counsel (OGC): The OGC representative provides consultation to the BCT regarding compliance with relevant laws and policies.
- 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 requested.

