

**STATEMENT OF EQUAL OPPORTUNITY  
AND ENFORCEMENT PROCEDURES**

I. Statement of Equal Opportunity

- A. It is the policy of Northwestern University School of Law (“Northwestern Law”) not to discriminate against any individual on the basis of race, color, religion, national origin, sex, sexual orientation, marital status, age, disability, citizenship, or veteran status in matters of admissions, employment, housing, or services or in the educational programs or activities it operates, in accordance with civil rights legislation and University commitment.
- B. Northwestern Law is committed to the same policy of equal opportunity for all students and alumni/ae. The facilities and services of the Northwestern Law are available only to those employers whose practices are in agreement with this policy. The representatives of any employer using these facilities and services, in doing so, affirm that the employer does not discriminate.<sup>1</sup>
- C. An employer may be required to affirm its compliance with the Statement of Equal Opportunity at any time, either as part of its posting of a job, registration for an on-campus or other recruiting activity, or as a result of a complaint concerning its conduct and policies.
  - 1. An employer that refuses to affirm its compliance with this Statement of Equal Opportunity is ineligible to use the facilities and services of Northwestern Law.
  - 2. An employer that affirms its compliance with the policy but adheres to employment policies or practices that conflict with the policy may be subject to sanctions as set forth below.

II. Purpose of Enforcement Procedures

- A. Northwestern Law is firmly committed to the principle of equal opportunity and has drafted the following procedures to protect Northwestern Law students during the interviewing and summer/school-year employment process. Even if conduct does not rise to the level of discrimination or harassment, Northwestern Law would like to be made aware of such, as we have an interest in providing a forum for exploring and discussing insensitivity.
- B. Experiencing what one perceives to have been an insensitive or discriminatory act can be difficult and emotionally challenging. These enforcement procedures assist students in resolving such situations in a way that meets their needs, and those of

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<sup>1</sup> As used herein, the term “employer” refers to the organization and not to any individual alleged offender.

current and future members of the Northwestern Law community, while also educating employers.

### III. Complaint Procedure

- A. If a student feels an employer has acted in an offensive or inappropriate manner, the student is strongly encouraged to discuss the incident with the Assistant Dean for Career Strategy and Advancement (the “Assistant Dean”).
- B. Any student who believes that an employer has violated Northwestern Law’s Statement of Equal Opportunity is also strongly encouraged to file a Formal Complaint with the Assistant Dean. A Formal Complaint comprises two elements:
  - 1. Discussing the incident with the Assistant Dean; and
  - 2. Completing and submitting in writing a Complaint Form. The Complaint Form can be found online at:  
[http://www.law.northwestern.edu/career/students/documents/eo\\_complaint\\_form\\_2009.pdf](http://www.law.northwestern.edu/career/students/documents/eo_complaint_form_2009.pdf)  
or picked up in the Center for Career Strategy and Advancement (“Career Center”).

### IV. Timing

- A. Students are strongly encouraged to speak with the Assistant Dean and submit a Complaint Form in a timely manner regarding any potential violations of the Statement of Equal Opportunity.
- B. Formal Complaints should be filed with the Assistant Dean within forty-five (45) days of the incident. Later filing of a Formal Complaint may be permitted for good cause shown or for other mitigating circumstances, at the Assistant Dean’s discretion.

### V. Investigation

- A. Once a Formal Complaint has been filed, the Assistant Dean will, in a timely manner, review the Complaint Form and, if deemed appropriate, conduct an investigation of the facts of the incident in collaboration with the student submitting the Formal Complaint.
- B. An investigation may include, but is not limited to, speaking with:
  - 1. The student who filed the Formal Complaint;
  - 2. Other students who may have knowledge of the alleged incident or who interviewed with or worked for the employer in question; and
  - 3. Other individuals who may have specific knowledge relating to the incident.

### C. Confidentiality

1. Once a Formal Complaint has been filed, the student's identity may need to be revealed during the course of investigating and determining a response to the alleged violation.
2. If the Assistant Dean determines that it is necessary that the student's identity be revealed to the employer, the Assistant Dean shall advise the student of such a determination prior to disclosing to the employer any personally identifiable information about the student. If the student does not consent to such disclosure, the Formal Complaint may be dismissed on that ground.

## VI. Evaluation and Response

### A. Evaluation

1. The Assistant Dean, in consultation at his/her discretion with other individuals (including but not limited to other Assistant Deans, Associate Deans, the Dean of Northwestern Law, and Northwestern University counsel), is charged with evaluating the incident and recommending Northwestern Law's response.
2. Factors to be considered in evaluating the incident include, but are not limited to:
  - a. The nature and seriousness of the violation;
  - b. Whether this was an isolated incident or part of a pattern of behavior;
  - c. The extent of remedial measures already taken by the employer; and
  - d. Additional factors that may become relevant during the investigation.

### B. Response

1. If the Assistant Dean determines that a violation of Northwestern Law's Statement of Equal Opportunity has occurred, he/she may impose sanctions, including, but not limited to:
  - a. Notifying the employer of the violation and inquiring about what measures have or will be taken to address the situation;
  - b. Requiring an apology to affected students (in accordance with Section V.C.2, above);
  - c. Requiring that the violation be reported to the employer's managing partner or equivalent;
  - d. Placing the employer on probation for a period of time; and/or
  - e. Suspending the employer's on-campus recruiting privileges at Northwestern Law for one or more years.
2. If the Assistant Dean deems that the employer's response to the levied sanction(s) is inadequate, he/she at his/her discretion may pursue the matter further and take subsequent action.