



The Washington Center

# TWC Code of Conduct & Community Life Expectations

v2021

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# Introduction

The Washington Center was founded on the belief that the right experience can transform students' lives, setting them on a course of achievement, leadership, and civic responsibility. A defining hallmark of The Washington Center experience is the high levels of professionalism and integrity demonstrated by those participating in our programs.

Participants in The Washington Center's programs come from all parts of the world – each brings with them a myriad number of experiences in academics, civic awareness, leadership foundation, and self-awareness. The Washington Center strives to foster a sense of community around shared experiences, goals, activities and aspirations. As an integral member of our community, each participant plays a vital role in ensuring that a positive living, working, and learning environment exists for everyone at The Washington Center.

In response to CoVid and the global pandemic impacting all of higher education and to ensure the safety of all participants and foster an environment that will promote the constructive transformation of students' lives, The Washington Center has instituted policies and procedures that safeguard and promote its expectations of professionalism and integrity as well as maintain a safe and healthy environment for all. The Code of Conduct covers the expectations of our participants and residents, and it outlines a framework for fostering mutual respect and support among all members of the TWC community. The Code serves as a guide for making informed decisions and for all participants to understand their rights and responsibilities during their time with The Washington Center.

Upon acceptance into a Washington Center program, all participants must adhere to the following expectations to foster a productive learning and professional environment for all TWC community members.

# I. General Expectations

- a. COVID-19: All TWC participants are expected to follow all directives from The Washington Center related to hand washing, social distancing, mask wearing, self-monitoring/reporting, and other public health directives in order to slow the spread and viral impact in all aspects of our experience including virtual and residential.
- b. Professionalism: Individuals participating in The Washington Center's programs, in-person or virtual, must conduct themselves with appropriate integrity and professionalism in all aspects of the program. This includes but is not limited to the pre-internship processes, conduct in classes, during in-person or virtual TWC sponsored events, in the community, in the housing, in the internship and any other related settings.
- c. Attendance: There are attendance requirements for all TWC Programs, including, but not limited to the evening course, remote internship, and the career readiness/professional development programming as these are part of the core of The Washington Center's experience. All participants must be on time and present unless otherwise instructed by their Career Advisor, program advisor/manager, course instructor, internship supervisor, or other designated TWC official. Seminar participants are similarly held to a required attendance policy for events, lectures and other meetings, as instructed by TWC staff and professors.
  - Students are expected to adhere to their work schedule as outlined in the internship agreement form.
  - Regular attendance and participation in the evening academic course is essential to the academic learning experience.
  - Review the Program syllabus and/or guideline for requirements related to attendance for the semester.
  - Additionally, participation in The Washington Center's scholarship or funded programs may have required minimum grade levels, events and/or other stipulations where failure to attend could result in financial award/stipend impacts.
- d. Adherence to the Conduct Process: Adherence to TWC's Code of Conduct, in addition to, participants' Universities Codes of Conduct or other policies of the program is expected and may be considered with any sanctions, educational requirements, payments, or other details required of them following the conduct process.
- e. Directions from TWC Officials: Participants are expected to comply with the directions of TWC officials (Career Advisors, Program Advisors/Managers, Alumni Mentors, Community Life staff, etc.). Conduct, such as being disrespectful, uncooperative, abusive, or threatening behavior(s), is not in conformity to the goals of TWC's programs and will initiate the conduct process. All participants are expected to adhere to the policies and expectations listed in the specific syllabi and/or set by the instructor or other representatives of The Washington Center
- f. Financial Aid: Participants receiving financial assistance awards from TWC may be required to reside in TWC housing facilities. As such, removal from TWC housing will result in loss of financial aid, with the appropriate amount added to the participant's account.

Participants receiving financial assistance awards from TWC may be required to fulfill specialized requests as part of the financial award as well as successful completion of the program. As such, removal from the TWC program will result in loss of financial aid and a new invoice issued to the participant reflecting the financial aid amount added to the participant's bill.

For all billing-related issues, invoices will be delivered to participants with a timeline for payment.

Students who fail to meet the terms of the invoice or sign a promissory note will receive a written warning of possible expulsion. The standing of students who fail to satisfy outstanding balances will be determined by the CFO and the Vice President of Student Affairs.

- g. **Unauthorized Departure from Internship:** The untimely and unapproved departure from an internship site without prior approval from the internship site supervisor and/or career advisor is a violation of the code.
- h. **Dismissal from Internship:** The termination of the participant by their internship site due to poor or unsatisfactory performance, disruptive behavior, or other reasons is at the discretion of the internship site supervisor is a violation to the code.
- i. **Unsatisfactory Performance:** Performance that does not meet The Washington Center's standards in a course, internship, or career programming that results from a failure to exercise minimally due diligence is prohibited.
- j. **Bias-Related Incidents** refers to any act or behavior that is a violation of the Student Code of Conduct and reasonably believed to be motivated by a consideration (real or perceived) of race, color, creed, religion, age, sex, gender identity, national origin, marital or parental status, sexual orientation, citizenship status, veteran status, disability, or any other basis protected by law.

Individuals are encouraged to report all bias-related incidents immediately to their Career Advisor and to the Student Services and Community Life department.

- k. **Safe Space Recognition:** Participants are free to express themselves in a responsible manner. Such expression shall not impinge on the rights of others, or disrupt administrative activities or approved programs or events. TWC identifies as a safe space for individuals to come together to communicate regarding their experiences and does not tolerate violence, harassment or hate speech, or expression that thereby nullifies a safe place for all students.
- l. **Harassment:** Harassment is not permitted and will not be tolerated by TWC. Harassment is defined as any targeted unwanted or unwelcome behavior that is severe and persistent enough to negatively impact an individual's ability to learn and/or work in The Washington Center community.
  - Harassment may include repeated slurs, or taunts in the guise of jokes, or disparaging references to others, use of epithets, bullying, stalking, stereotypes, comments, gestures, threats, graffiti, display, or circulation of written or visual materials, taunts on manner of speech, and negative reference to customs when such conduct is discriminatory, as explained below, or other characteristics identified by The Washington Center. This applies to acts that take place in-person, through social media, online platforms or any method of communication.

- Discrimination: Targeted harassment (defined above) based on an individual's status in a protected class.
  - Intimidation and Threat: Behavior or conduct that intentionally causes another individual to reasonably fear for their immediate safety.
- m. Sexual Misconduct (including sexual harassment and sexual violence) constitute grievous violations of TWC policy.
- Sexual misconduct (including sexual harassment and sexual violence) constitute grievous violations of TWC policy.
  - Sexual harassment is defined as making any unwelcome sexual advances or requests for sexual favors to another person, or engaging in any activities or conduct of a sexual nature with respect to another person that is offensive, degrading or pervasive, or that creates an intimidating or hostile academic, work, or social environment for that person.
  - Sexual violence is defined as any physical sexual act against any person, including without limitation any sexual abuse, assault, battery, invasion or penetration (including but not limited to sexual intercourse), against that person's will, or without that person's consent, or when that person is incapable of giving consent due to his or her age, family relation to the other person, medical or physical condition, intellectual or other disability, or use of alcohol or other drugs. "Consent" requires words or actions indicating a freely given agreement to have sexual intercourse or engage in other sexual activities.
  - The lack of verbal or physical resistance does not by itself constitute consent. The degree of impairment of a person's ability to give or withhold consent (including but not limited to incapacity or helplessness caused by alcohol or other drugs) may be introduced as pertinent information at any disciplinary hearing.
  - The Washington Center takes such acts seriously and charges each member of its community with the responsibility of becoming more educated regarding sexual misconduct and its consequences. The Washington Center also educates its staff regarding the appropriate protocols, level of response, and resources in handling these situations.
- n. Criminal Activity: TWC participants are subject to all local, state, and federal laws. Consequently TWC will cooperate fully with local, state, or federal officials in any investigation related to illegal activities.
- o. J-1 Visa Regulations: Individuals participating in The Washington Center's internship program via a J-1 Visa are required to follow each stipulation outlined by the Department of Homeland Security, which can be found here: <http://j1visa.state.gov/programs/>.
- p. Contempt of the Conduct Process: Participants who violate TWC's Code of Conduct or other policies of the program are expected to participate in the conduct process, and follow through with any sanctions, educational requirements, payments, or other details required of them following the process. Contempt includes failure to appear for a conduct hearing or failure to observe and comply with conduct sanctions. In rare cases, complainants may be informed of the outcome of an incident report. Any student found to have inappropriately shared information related to a conduct investigation will be held in contempt of the conduct process.

If a participant is suspected of or is found to be in connection with any misconduct, a TWC staff member may request to meet in-person or virtually with said individual. Participants are expected to respond to all requests for a meeting within one business day and schedule an official meeting time no more than two business days from the initial request for a meeting. The Washington Center reserves the right to schedule an in-person or virtual meeting at any point based on severity. Failure to report to meeting requests may result in further disciplinary action or sanctioning being given without a meeting.

## II. Academic Integrity

The academic honesty policy was established to ensure that the learning environment of The Washington Center is honest and fair. Any violation of honesty or integrity in academic work is a serious matter of misconduct. The Washington Center reserves the right to impose penalties and sanctions for any incident of academic misconduct, up to and including failure for the assignment, part or all of the program, and/or expulsion from the program.

- a. **Absenteeism:** The chronic failure of a student or participant to attend their academic course, remote internship, or required career readiness programming, regardless of the excused or unexcused nature of the absence. Chronic absenteeism may also be disruptive to the learning experience of other students in the class. Students who miss more than two regularly scheduled class meetings of the evening course will receive an official academic warning. Students who miss more than two regularly scheduled class meetings of the evening course will be administratively withdrawn from the course and their home institution will be notified of the withdrawal.
- b. **Disruptive Behavior:** Any behavior, whether active or passive, that interferes with the environment of teaching and learning or tone of professionalism as established by the instructor, internship supervisor, career advisor, or other official of The Washington Center. Disruptive behavior may include, but is not limited to, inappropriate dress, harassment, chronic lateness, refusal of directives of any TWC official, or violation of internship site policies.
- c. **Academic dishonesty:** Any behavior that knowingly attempts to undermine or deceive an instructor and violating the learning environment which includes:
  - Cheating: intentional use or attempted use of trickery or deception in one's academic work
  - Plagiarism: knowingly representing the words or ideas of another as one's own work
  - Falsification: the improper alteration or misrepresentation of any source, record, document or evaluation submitted to an identified TWC Official or Platform.
  - Complicity: the act of intentionally or knowingly helping or attempting to help another commit an act of academic dishonesty.

### III. Community Life Misconduct

- d. **Alcohol Use and Intoxication:** In the District of Columbia, only persons 21 and over may legally consume alcohol. Therefore, individuals not of legal age are strictly prohibited from consuming alcohol while participating in TWC programs or residing in TWC properties. Persons of legal drinking age may not distribute alcohol to those underage. All residents of the apartment are responsible for the behavior and actions of their guests, in relation to alcohol, regardless of their presence or involvement. This includes underage drinking.
- Persons presenting symptoms of extreme intoxication will be referred to emergency personnel for medical evaluation. These incidents will be reported as conduct violations and are subject to sanctions.
  - Possession or consumption of an open container (i.e. unsealed bottles, cans, cups of alcohol, and others) of any alcoholic beverage on apartment balconies or in TWC public areas (hallways, elevators, lounge space, etc) is prohibited. Kegs or large volume alcohol containers are also strictly prohibited within TWC residential facilities. Washington, D.C laws also prohibit the possession of open alcoholic beverage containers in public.
- e. **Cleanliness:** If building management or TWC staff deems an apartment below acceptable standards of cleanliness, notice will be given to improve the conditions of the apartment in a reasonable time frame. If the conditions in the apartment are not improved within the provided time frame, building management or TWC staff reserve the right to have the apartment professionally cleaned. Professional apartment cleaning services will result in an Apartment Damage fine charged to the responsible residents, and does not include shampooing of carpets or painting, which incurs additional fees. Failure to maintain the apartment at a reasonable level of cleanliness and safety may also result in removal. Residents who are removed from housing will not have their housing security deposit refunded.
- TWC Residents are expected to disinfect and clean their apartments, particularly shared spaces, each week. TWC officials will do apartment inspections on a monthly basis to ensure the health and safety protocols are being taken seriously.
  - Building management and/or TWC staff reserve the right to assess damages to an entire suite, floor, or building for any damages to or excessive trash left in any of the building common areas, including trash rooms, lounges, classrooms, the fitness center, or public restrooms.
- f. **Criminal Activity:** Any incidents involving criminal/illegal activity or suspected criminal/illegal activity must be reported immediately to all authorities including: Student Services staff, the security/management of the housing facilities (if applicable), local police, and/or other area police departments (e.g., National Park Police, Capitol Police or Metropolitan Police). Participants who are victims of criminal activity are encouraged to file a report with the proper authorities (such as the local police) and provide Student Services staff members the case number of any case filed to ensure appropriate follow-up.
- g. **Drugs:** The use, possession, and/or distribution of unauthorized / illegal drugs or controlled substances is strictly prohibited. This also applies to possession of paraphernalia containing drug residue and the unsanctioned use of prescription and over-the-counter drugs. Such use, possession, or distribution of drugs will be reported to the local police department, the participant's academic institution, and the Office of Student Services and Community Life at The Washington Center. Those who violate this policy will be considered for immediate expulsion from their TWC program.

- The consumption of marijuana, although decriminalized for recreational use in the District of Columbia, is not permitted within TWC facilities. Suspected use, possession, or distribution of marijuana in any form will be treated by TWC officials like any other unauthorized or illegal drug.
- h. False Information: Dishonest behavior and/or knowingly providing false information, either verbally or as a form of identification, to a TWC staff member are strictly prohibited. This includes, but is not limited to, furnishing information to do the following: to gain unauthorized access to The Washington Center facilities, materials, equipment, or TWC-sponsored events; to evade potential conduct charges; to falsely pass another individual's identification as one's own and/or to give another individual one's own identification; or to gain access to an apartment that is not one's own.
- i. Noise: At all times, residents are expected to maintain a volume that does not disturb others. Residents must be considerate of others in the building and are expected to use good judgment to avoid excessive noise and other disturbances to building occupants. Noise policies are in effect for all TWC spaces, including, but not limited to, apartments, lobbies, common areas, patios, and outside the residential areas. Non-TWC tenants have the right to complain about noise or call the local police. Of note, DC noise ordinance is from 10 pm to 7 am city wide.
  - Excessive noise is defined as unreasonably loud noise that is likely to annoy or disturb one or more persons or noise that can be heard audibly from outside of the apartment unit. Sanctions for noise can be given at any time (24 hours a day / 7 days a week) if the volume of any participant(s) is deemed inappropriate.
- j. Photo Identification: All participants with TWC are required to carry their TWC ID, along with a valid government-issued or university-issued photo ID, with them at all times. Upon request, an intern must produce photo identification for examination by The Washington Center staff, concierge/security staff, and/or building management personnel. Failure to comply with a request to present this information may result in police involvement; uncooperative parties may be escorted out of TWC facilities or events until proper identification can be provided or a TWC staff member can properly identify the individual.
- k. TWC identification card (ID) and an access card: Identification cards depict the TWC logo and contain the participant's name and program. The access card grants access to all appropriate TWC facilities. IDs and access cards are for individual use only and are not to be loaned to other individuals. These items carry the following regulations:
  - Participants must present the TWC ID to gain access to The Washington Center main headquarters at the receptionist area and the Residential and Academic Facility (RAF). Participants must present the TWC ID to use the Residential and Academic Facility shuttle (available only during move in).
  - Participants must present the TWC ID to retrieve packages and other items from the Concierge desk at the Residential and Academic Facility.
  - Lost or stolen IDs and access cards will result in a Lost ID and/or Access Card fee.
  - At the end of the term or program participants must return TWC ID and the access card to avoid fines.
- l. Photographs/Audio/Visual Recordings Taken at Events: The Washington Center reserves the right to use a photographer at all events or record online sessions and feature any media taken in future publications. If you do not wish to have your imaged used in TWC publications or on social media,

please contact the Chief Marketing Officer, Menchu Mendiola, at [Menchu.Mendiola@twc.edu](mailto:Menchu.Mendiola@twc.edu) within 5 days of your arrival to The Washington Center.

- m. Right to Privacy: Residents are free to express themselves in a responsible manner. Such expression is unacceptable when the expression impinges on the rights of others, or when it disrupts administrative activities or approved programs or events.
  - Taking photographs or making audio or video recordings of another person without his or her permission in any context in which that person has a reasonable expectation of privacy is prohibited. For example, residents and visitors may not photograph or make recordings of other residents or visitors in any area, including rooms, suites, online platforms, or restrooms, within the residential facilities without written or verbal permission. In such areas, permission must be granted by all persons being photographed or recorded.
  - In a situation in which it is not acceptable to take a photograph or make a recording, it is also not acceptable to publish it. Transmission, in print, by phone, via email or any other means of technology constitutes publication. Publication of any photograph or recording is also subject to all applicable policies and laws, including copyright, in the same manner as any other image or document.
- n. Vandalism & Stealing: Stealing or vandalizing is prohibited. This includes but is not limited to all furniture, kitchenware, and common area items (e.g. fitness center equipment, computers, lobby fixtures) provided by The Washington Center. Full replacement costs and fines will be levied upon responsible parties. Damages that cannot be traced to a particular person will be assessed equally among all residents of the apartment, or shared among all building occupants or participants, depending on the location of the vandalism or stolen item(s).
- o. Physical Harm: Acts or threats of physical violence, intentional infliction of harm to another individual or self are not permitted, and will result in intervention by TWC staff, local police, or emergency personnel, as appropriate.
- p. Weapons & Firearms: The use or possession of firearms, weapons, certain fireworks, or items used as weapons are prohibited under Washington, D.C. law; such possessions (including all forms of fireworks) are not permitted in any TWC facility or at any TWC event. Possession will result in immediate confiscation by TWC staff members or local law enforcement. Any use of weapons/firearms will result in removal from TWC housing facilities and may require local law enforcement involvement.
- q. Zoom and online experience: The purposeful interruption or disruption of TWC sponsored online programs by students via Zoom bombing, inappropriate posts, language use, and more will not be permitted and could result in harassment charges under the Code of Conduct.

## IV. Residential and Academic Facility Codes

The following regulations and guidelines apply to the residing in and the using common areas within TWC owned and leased facilities, apartments, and any other shared living and/or meeting space associated with The Washington Center.

- a. **Air Conditioning/Heating Units:** TWC apartments have individually controlled thermostats. Please do not block the air units. Windows should not be left open during the day when the apartment is unoccupied – condensation can form and wet the carpet and floor. Please do not leave the sliding glass door or the front door of the apartment open; doing so will allow heat or air conditioning to escape from the apartment. On hot days, closing the blinds/curtains of the windows to keep the room cooler is recommended. The AC unit must NOT be set lower than 67 degrees Fahrenheit and the heat should NOT be set above 74 degrees Fahrenheit. Failure to maintain this temperature could lead to damages to the unit, for which the residents in the apartment will be held responsible.

In times of conflict between roommates over room temperature, TWC staff reserve the right to lock the room temperature at 71 degrees Fahrenheit.

- b. **Apartment Access and Use:** Designated persons (specifically Office of Student Services staff and building management personnel) may enter and inspect rooms at any time without permission or consent of the occupants for the following reasons: health and safety purposes, to conduct repairs or general maintenance needs, or if there is just cause to suspect student endangerment or policy infractions. Participants are expected to comply with all reasonable requests for entry.
  - i. Common space in apartments is not intended to be inhabited. Residents are not allowed to move their bed or mattress to the common areas during their time at The Washington Center. Also, residents may not permanently sleep on the sofa. Common areas such as the kitchen, dining room areas, and family room are for all apartment occupants to enjoy and use.
- c. **Apartment Furniture and Appliances:** All TWC apartments are furnished; the following is a list of items that are included in one apartment: beds (1 per student, typically a 4 person unit but during COVID-19 impacts, only two students per apartment. All furniture must remain in the unit); closet/wardrobe; coffee maker; dining room table and chairs; dishwasher; dresser; ironing board and iron; lamps; living room couch/loveseat and chair; microwave; plates, bowls, coffee cups, flatware, glasses; pots and pans; refrigerator; stove and range; television; toaster, and washer/dryer. Furnished items should never be taken out of their assigned apartment or used on the balcony. If items are lost or damaged, the residents residing in that apartment will be assessed Apartment Damage fines for the cost to replace or repair the item(s). Below are guidelines for the use of these items:
  - i. **Beds:** Beds within the Residential and Academic Facility (RAF) are twin extra-long. In the RAF, beds may only be lofted by building management; bed loft requests may be submitted through the appropriate maintenance system. Beds may not be lofted in TWC-affiliate housing options outside of the RAF.

- ii. Desks: TWC apartments do not come furnished with desks. If desired, residents will need to bring or purchase a desk upon arrival.
  - iii. Dishwashers: TWC apartments are provided with a dishwasher. Only use dishwasher detergent in the dishwasher. Using dish/hand washing liquid will damage the dishwasher and may cause it to leak into the apartment. Residents may be liable for any water damages that occur as a result of misuse.
  - iv. Washers and Dryers: Most apartments are equipped with a washer and dryer unit. Residents will be held financially accountable for any damage to equipment due to improper use. Each washing machine in the Residential and Academic Facility have a latching mechanism that locks the machine during and immediately after use. Allow the wash cycle to completely finish and the latch to release before trying to access clothing. Pulling on the latch and breaking it off will cause the machine to no longer function, and will result in a damage charge to the individual(s) responsible.
  - v. Vacuum Cleaners, Brooms, and Dust Pans: Apartments are provided vacuum cleaners, brooms and dust pans. As with all other housewares items, vacuum cleaners, brooms and dustpans present at move-in should be left in the apartment after check-out. Items missing from the room at check-out will be assessed in damages, which will be billed to the occupants or responsible parties (as available). If a vacuum is not working properly, check the vacuum cleaner bag. If the bag is full, residents are responsible for emptying or replacing the bag.
- r. Internet Service: The Washington Center provides high speed internet service through an internet service provider in every apartment. The Washington Center is not responsible for any loss of service due to technical problems or weather. Residents are expected to contact the service provider to troubleshoot and resolve issues. TWC will work with management and/or service providers to ensure a prompt response to any problems that are escalated. Participants are not permitted to contract for any other services, including but not limited to, extra internet or paid services billed to TWC. Adding additional services for the apartment may result in fines assessed to each student residing in the apartment. In addition, residents of the apartment will be held responsible for paying any charges associated with the additional services, the disconnection of the additional services, and/or the return of any equipment associated with said services.
- s. Check-out Procedures: All participants must check out and leave apartment units within the time frame that is indicated on the housing application.
- It is expected that housing facilities, including public areas, will be kept in good condition and used in a careful, safe, and proper manner, and that participants will abide by The Washington Center's policies. The condition of a resident's apartment is assessed prior to check-in and again after the residents move out. Residents are responsible for reviewing the condition of their living spaces on the "Apartment Inventory Report" at check-in and check-out. All apartments and common areas in the housing facilities must be returned to the same condition in which they were found at check-in.

- Failure to properly check out will result in an Improper Check-out fine. Improper check-out includes the following: failure to review and adhere to the posted Check Out materials; failure to check out prior to the announced deadline or timeframe without prior approval or extension (a fine is assessed per hour after deadline); or failure to leave the apartment in satisfactory move-in condition. Participants will be billed for the cost to replace any keys, building passes, and/or parking passes that are not returned prior to check-out and departure.
  
- t. Common Area Access/Use: Classrooms and Auditorium Space: The classrooms and auditorium are reserved by Student Services for academic and programming needs. Classrooms are otherwise locked. No food or drink is permitted in the classrooms. If TWC makes classrooms available for student utilization, participants interested in reserving a space for group projects, study hours, etc. must reserve the space using the RAF Room Reservation Request Form (<http://www.twc.edu/reservation>). All reservations are made based on availability and approval by the Office of Student Services and Community Life. Participants using classroom space for personal or group meetings take on responsibility for the cleanliness of the room including sanitizing or disinfecting after use with provided materials, as well as the equipment in each room (such as computers, chairs, tables, etc.). All participants will observe appropriate social distancing guidelines while in any approved public space. Any damage to classrooms will be the responsibility of the individual(s) who reserved the room. Computers, Smart Boards and other electronic equipment in the room are not for participant use
  - Students will be expected to wear masks in all public spaces of The Washington Center's Residential Facility including the lobby and hallways due to the public health and community risks.
  
- u. Fitness Center and Computer Lab: The Fitness Center and Computer Lab, both located on the P1 level of the RAF, are accessible for all TWC participants; hours of operation are from 7 pm to 11 pm daily.
  - Access to these amenity spaces will be restricted to 4 residents per hour in accordance with local public health guidelines.
  - Residents will be required to sign in and out of the fitness center with the front desk to ensure contact tracing capacity.
  
- v. Common Area Accoutrements: Furniture, artwork, and other items in common areas are not to be moved without prior permission from Student Services staff. Computers, televisions and other technological equipment in common areas are not to be tampered with or moved. Damages to common area items may result in charges being distributed amongst all participants with access if the appropriate individual(s) cannot be identified.
  - Hallways, stairwells and lobby areas should be kept clear at all times for easy access. Personal belongings, luggage, trash and other items may not be stored in common areas. Playing sports in common areas is strictly prohibited. In response to COVID-19, residents should not congregate in any common area and follow the directives as shared by TWC.
  
- w. Patio: The RAF patio area is a shared space. Participants are not allowed to place personal belongings for any reason on patios for any amount of time. Items found on the patio will be discarded, and TWC will not be responsible for said items. Participants and their guests should be especially mindful of their noise level when on the patio, as this common area is close to many resident rooms. Patios can only be accessed through common area doors.

- Residents are expected to maintain DC standards in social distancing, wear masks, and are not permitted to move the furniture from its designated locations. Gatherings cannot exceed the DC government stated guidelines.
- x. Pool Regulations: Some TWC-affiliated residential facilities have access to a pool. Outdoor pools are generally open from Memorial Day (late May) to Labor Day (early September) and closed the remainder of the year. Pool regulations are set and regulated by building management; such regulations are typically posted near the pool and should be followed. The pool counts as a common area, as defined in the appropriate section above.
- y. Elevators: Elevators are in each apartment building. As a source of transportation to the living areas of the buildings and a necessity for many residents in those buildings, please use care and respect when using the elevators. Smoking and/or leaving trash in the elevators is prohibited. Vandalism, inappropriate writing or other misconduct is prohibited in the elevator itself and on approved postings in the elevator.
- During an emergency situation, such as a fire alarm, participants and their guests may not utilize the elevator. Persons with disabilities should move to the nearest stairwell for evacuation by the fire department. If that stairwell is compromised, move to the other end of the complex. Residents and their guests must wait for staff members to give permission before reentering the building following a fire alarm or other evacuation procedure. Individuals reentering the building are not permitted to use the elevators and should take the stairway. Individuals requiring the elevator may use this service as soon as it is restored following an emergency.
  - Ringing the elevator alarm bell and/or utilizing the elevator phone is strictly prohibited if there is not due cause, such as an emergency situation.
  - Residents will be required to limit the number of residents per elevator to no more than 2 at a time for the safety and health of the community.
- z. Exercise Facilities: TWC apartment complexes have exercise facilities; equipment varies for each facility. All housing facilities require an ID/access card/fob to use the exercise facility. By residing in The Washington Center facilities, residents understand that neither TWC nor the management companies of its residential facilities shall be liable for any damages arising from personal injuries (including death) sustained by residents or their guests in, on, or about the premises, or as a result of the use of the exercise equipment or facilities. Residents accept full responsibility for any and all injuries, damages (both economic and non-economic), and losses of any type, which may occur to them or their guest(s).
- By using the exercise facilities, residents agree to be solely responsible for safety and well-being of themselves and their guest(s). The Washington Center does not provide supervision, instruction, or assistance for the use of the facilities and equipment or provide monitoring for social distancing.
  - Users must comply with all rules imposed by The Washington Center regarding the use of the facilities and equipment. Users must conduct themselves in a controlled and reasonable manner at all times, and refrain from using any equipment in a manner inconsistent with its intended design and purpose.
  - Users must acknowledge that the use of exercise equipment involves risk of serious injury, including permanent disability and death. Users also should understand and agree that The Washington Center is not responsible for property that is lost, stolen, or damaged while in, on, or about the premises.

- Users must understand and agree that their use of the facilities and equipment is only to be undertaken on their own personal time and that their use of the facilities and equipment is not within the course or scope of their program participation.
- aa. Fire Equipment/Alarms: Residents and their guests are required to leave the building when a fire alarm sounds. Federal law forbids misuse or abuse of fire equipment (tampering/disconnection of alarms, extinguisher, hoses, smoke detectors, hanging items from sprinkler heads, etc.). Tampering with any fire equipment in an apartment or common area (e.g. smoke detectors, sprinklers) will result in a fine per responsible party, in connection with replacing or reconnecting the fire equipment, repairing any damages, and any fines given by building management.
- During a fire emergency/evacuation, residents are expected to wear a face mask when exiting the building and provide as much social distancing as possible during the evacuation and while waiting in the evacuation zone.
  - Emergency exit doors should never be propped open and should only be used in the case of an emergency. Fire exits or fire doors may not be blocked at any time. Hallways and other common areas are generally paths of evacuation and should be kept clear at all times.
- bb. Guests: To maintain a noise level that is acceptable and conducive to a professional living environment and to maintain a reasonable approach to safety and health, each occupant is limited to no more than one (1) guests in an apartment at one time across all TWC residential facilities. Guests are defined as anyone not assigned to the specific unit.
- During the semester, no external guests (non-TWC interns) will be permitted in residential spaces outside of the check in and check out processes.
  - All residents of the apartment are responsible for the behavior and actions of their guest(s), in both the apartment and on the property, whether or not they are present when the behavior occurs. Guest(s) are not permitted to stay in any TWC facility without the presence of their host at any time. Guest(s) will also be held accountable for their behavior and actions in line with the Code of Conduct.
  - Additionally, Guests who choose to visit an apartment and exceed to stated levels above will also be considered a violation of TWC COVID safety protocols. Guests should remove themselves from that situation in order to remain in compliance.
  - The Washington Center reserves the right to ask any and all guests to vacate the facility at any time. If a guest is asked to leave and fails to do so, the police may be contacted to escort the guest from the building.
  - Residents may not allow any nonresident to enter a TWC facility if the nonresident is not known to the resident. This includes propping the door open for others to enter the facility or claiming responsibility for a guest and then not accompanying the guest throughout the building.
  - Additionally, TWC Academic Seminar programs and/or programs granted extensions, participants are not allowed to have overnight guests in TWC housing.
- cc. Keys and Locks: Each resident is provided one key to each lock in an apartment door. Residents may also be provided with a key or a pass card to access the front door of their assigned building, if needed. If a resident is locked out of his/her apartment, the concierge/security staff, Alumni Mentors on Call, or the Office of Student Services can be contacted if immediate access is needed. Residents will be assessed a Lock-Out fee per instance. Lost keys and access cards should be reported to the Office of

Student Services, as soon as possible. Replacing lost keys and/or creating new locks will incur appropriate fines.

- Participants and their guests may not tamper with or damage any locking mechanism, including but not limited to door locks, mailbox locks, access panels, sliding glass door stops and window stops. Damage to locks must be reported immediately and may result in fines if negligent behavior occurred.
- For optimal safety and security of personal belongings, apartment doors are to be locked at all times. The use of the deadbolt lock is encouraged. Apartment doors may not be propped open at any time. Residents are encouraged to have renter's insurance to ensure protection of their belongings.

dd. Mail Services: Each housing facility has United States Postal Service, which is delivered and picked up Monday through Saturday (except when the United States Post Offices are closed). Resident mail will be delivered to the box corresponding with the addressee's apartment number. Any mail received that is not addressed to a current resident should be marked "return to sender" and placed in the outgoing mail slot.

ee. Package Delivery: Packages will be accepted by concierge staff at the front desk. Residents will be notified by email when a package has been delivered. To pick up the package, resident will show photo ID at front desk while maintaining social distance, and will be directed to "package pick-up" table in lobby to retrieve item. At that time- package will be noted as picked up by staff.

**Resident addresses should read as follows:**

Name (ex. Jane Smith)

Number and Street Name of Building (ex. 130 M Street, NE)

Apartment # (ex. Apartment 7C)

City, State and Zip Code (ex. Washington DC, 20002)

ff. Maintenance Requests: Residents at The Residential and Academic Facility (RAF) should submit a maintenance request through the Community Life Portal (<http://www.twc.edu/clportal>). Residents not living in the RAF should notify their front desk/concierge for further details regarding maintenance requests.

- For most requests, maintenance staff members will address any reported issues within 48 business hours of submission. Some issues may take longer, depending on part availability, nature of the issue or other building priorities. Maintenance staff members may complete their work in the apartment when residents are not present. If this is the case, notification will be left to indicate that staff entered the apartment, along with details about any work that was completed or is still pending.
- In the event of an emergency maintenance or facility concern, RAF residents should contact the 24/7 Student Services on-call phone number (202-412-5302). Residents of other TWC-affiliated residential properties should contact the concierge/front desk of their residential property for more information.
- Maintenance will be performed when residents are not on site to provide additional safety and health measures. Should the resident be present when maintenance arrives, the residents will be asked to isolate in an area of the apartment that allows for social distancing between the facility team and the student.

- gg. **Parking:** Prior to arrival, participants must submit a parking request with their housing application to be considered for a parking space at the Residential and Academic Facility (RAF). Parking requests are submitted online via the application portal or found on the Accepted Student page of TWC's website. Parking spaces are limited and available on a first-come, first-serve basis.
- For approved parking requests, the termed rate per parking space must be paid by the resident's designated check-in date. Residents must park in their designated parking area and follow all building parking procedures. Vehicles that are not registered, are not parked in the designated area, or are not parked correctly (e.g., parked in a reserved spot, blocking another space) are subject to tow at the vehicle owner's expense.
  - The Washington Center assumes no liability for damage, tickets, or towing that may occur to vehicles. Residents granted parking must return parking decals/hangtags and garage passes to building management at check-out. Any parking decals/hangtags/garage openers not returned upon departure will result in a fine added to the participant's account.
  - Additionally, any damage to parking spaces or garage due to a participant's automobile will be charged to the individual assigned to that space. This includes but is not limited to: oil spills/leaks, fuel spills/leaks, damages to columns or walls, etc. Repairs or maintenance work on vehicles cannot be conducted in housing facilities parking or garage spaces; vehicles must be taken offsite for such maintenance.
- hh. **Pets:** No pets of any kind are allowed in TWC housing facilities.
- ii. **Postings and Decorations:** The hanging of banners, flags, posters, signs, clothing, etc., from windows, balconies, patio doors, the front door of the apartment, or in hallways is strictly prohibited. Signs, flyers, posters or other announcements are not permitted to be posted in any public area, including but not limited to elevators, hallways, exterior walls/fences of the building, and the front desk.
- Painting of individual apartments is strictly prohibited. Stickers, putty, or nails should not be used on furniture, walls or other locations that would leave a residue or damage to TWC property. Residents should use care when hanging and taking down artwork, posters or other items in individual rooms, as any damage that occurs will result charges to cover any repair needs.
- jj. **Prohibited Items:** Due to their extremely hazardous nature the following items are prohibited from possession and/or use in TWC apartments: halogen lamps, gas or charcoal grills, oil lamps, incense, candles and space heaters. No exceptions of any kind can be made to this policy, including for religious observances. Residents may not grill on balconies, back patio or the top parking lot.
- kk. **Property Management Policy Enforcement:** Management officials of TWC-affiliated residential facilities reserve the right to set and enforce policies specific to the housing facilities and grounds. Certain violations are subject to referral to law enforcement authorities. Public spaces, which include but are not limited to lobbies, hallways, stairwells, elevators, fitness centers, courtyards, pools, patios, and rooftop decks are subject to the rules and regulations of the housing facility. Residents are responsible for knowing and understanding the specific policies and regulations of their specific housing facility. Residents are also responsible for ensuring their guests abide by the same policies and regulations. Failure to comply with these regulations will be considered a direct violation of TWC policies.

Additionally, public spaces that are vandalized or damaged will result in common area charges being assessed to all residents in that residential facility. If the liable individual(s) is identified, said individual(s) will be charged accordingly.

- Restricted Areas: Unauthorized presence in any area marked as or known to be restricted by building management is strictly prohibited.
- Room Assignments and Room Swap: Residents assigned to TWC housing are not permitted to move into another TWC apartment without prior written approval from the Director of Student Services and Community Life. Room changes are not permitted within the first ten days of the program; after ten days, residents may work directly with their Alumni Mentor to determine alternative methods of resolution and next steps.

II. Roommates: Most apartments in TWC facilities are shared spaces between one or more roommates. Residents are expected to be respectful to their roommates during the program. Communication is an important tool between roommates to ensure mutual understanding and agreement upon shared responsibilities, such as cleaning and mandatory weekly sanitizing. For this reason, all TWC residents living with at least one other roommate or apartment mate MUST complete an Apartment Agreement Form at the beginning of their term. All apartment-mates must agree on the policies established in the Form and sign their consent. For any issues that are not agreed upon, residents should seek the advice and mediation of their Alumni Mentors.

- Despite upfront planning, apartment-mate conflicts can still occur throughout the term. In the event of the policies in the Apartment Agreement Form being violated or other discomfort within a room, all apartment-mates may be asked to participate in mediation with an Alumni Mentor or member of the Office of Student Services and Community Life. Failure to participate in these meetings may result in decisions regarding housing and student services being made on behalf of a resident by TWC staff members. Failure to follow mediation directions from an Alumni Mentor mediation or with the Manager of Community Life (or designee) after a mediation which the student is disturbing the peace in the apartment can result in removal from TWC housing without a refund.

mm. Smoking: Smoking is prohibited within all Washington Center facilities. Smoking is defined as inhaling, exhaling, burning, or carrying any lighted cigar, cigarette, electronic cigarettes, pipes, bong, hookahs, vape devices, or other lighted tobacco product in any manner or form. Smoking must be conducted a minimum of 50 feet from all TWC facilities. Students are not allowed to smoke on any balconies and patio areas of the residential units. Smoking in an apartment or restricted area will result in a minimum \$50.00 fine. Residents and participants will also be held responsible for any costs associated with the removal of any smoke smells, cigarette/cigar litter or other smoking-related damages and charges from building management.

- Smoking is also prohibited in all indoor public areas, including but not limited to hallways, elevators, stairwells, and lobbies of TWC facilities. If a participant chooses to smoke outside of a TWC facility, s/he must stand at least 50 feet away from designated entrances. Cigarette waste must be disposed of in proper receptacles. Failure to adhere to these guidelines will result in fines and sanctions.

- nn. Solicitation: TWC participants will not be permitted to utilize any TWC owned or rented property for any commercial venture or business. Commercial activity shall not be conducted by TWC participants on any TWC owned or rented property.
- TWC respects participants' rights to privacy. As such, businesses, as well as participants wishing to advertise programs, will not be permitted to distribute flyers, promotional items, and other goods to TWC owned or rented units. Any participant wishing to access TWC residents via residential units or common areas must first seek approval and be granted permission by the Office of Student Services and Community Life. This includes speaking engagements, door-to-door solicitation, flyer distribution and others actions. The Office of Student Services reserves the right to deny the display of content deemed inappropriate for the TWC community or the general public.
  - **Participants may promote approved events using the following channels:**
    - RAF Bulletin Board (near mailboxes on the 1st floor): Interested parties may email their flyer to [housing@twc.edu](mailto:housing@twc.edu) for review, approval, and posting.
    - RAF mailboxes: Interested parties can submit an electronic copy of flyers to [housing@twc.edu](mailto:housing@twc.edu). Student Services will review, determine approval, and electronically stamp the flyer (if permission is granted). Once approval is granted, participants may drop off 100 copies of their flyer at the Concierge desk for distribution.
    - Flyers in the RAF Elevator are typically not allowed, as this is strictly for Student Services events; however, Student Services reserves the right to allow flyers in the elevator at the office's discretion.
- oo. Trash Disposal: All trash should be removed from apartments in a timely manner. Cardboard boxes and newspapers must be disposed of in dumpsters or recycling bins instead of using trash chutes. Do not leave trash piled in a trash chute room; if a trash chute is not available or is backed up, notify the building management for appropriate next steps. Residents are encouraged to use recycling bins whenever possible to decrease the amount of trash disposed. **During a TWC-sponsored event or while in TWC facilities, all parties are responsible for cleaning up after themselves.** Excessive amounts of trash left in trash rooms may result in community charges unless the individual responsible is identified. During the week of check-out at The Residential and Academic Facility (RAF), the trash rooms will be locked. Residents must take all trash to the dumpsters in the top parking lot. Any individuals who leave trash in the hallways during check-out or who do not discard their trash appropriately will be subject to an improper check-out fine per trash bag or item.
- pp. Utilities: Fees for electricity, water, sewer, trash disposal, and gas service are included in the housing fee. Residents using these utilities excessively will be assessed accordingly. The Washington Center is not responsible for any loss of service due to weather or other area outages. TWC will work with management and/or electricity providers to ensure a prompt response to any problems; however, repair timelines are set at the discretion of local utility providers. Residents may overload the circuit by plugging in too many items or items with a very high wattage usage. If a fuse is blown due to too many items being plugged in, residents should use the fuse box to reset the circuit and refrain from overloading the circuit in the future. TWC is not responsible for individual residents utilizing more wattage than the apartment is able to accommodate. Residents should not receive utility or other bills, unless otherwise noted. Any bills that occupants receive should be immediately brought to the attention of and delivered to the Office of Student Services and Community Life at the Concierge desk at the

Residential and Academic Facility. If received bills are not given to an Alumni Mentor in a timely manner, the account may remain unpaid, which could lead to a disruption in service.

- Any utility concerns within the RAF should be reported to [concierge@twc.edu](mailto:concierge@twc.edu). Any utility concerns outside of the RAF should be reported to the respective concierge and then to [housing@twc.edu](mailto:housing@twc.edu).

qq. Windows, Balconies, and Doors: The throwing or dropping of objects from windows, sun decks, rooftops or balconies is prohibited. Tampering with or removing screens, door stops, or storm windows is also prohibited. Gaining access to another apartment via the balconies, patio access doors, or windows is expressly prohibited. Residents with windows or doors facing patio common areas are not permitted to access the patio through their apartments and must also use common access points. Removal of safety locks on patio doors or windows, and removal of window screens is also prohibited. If the safety lock is removed or tampered with on any apartment it will result in an Apartment Damage fine assessed to all responsible residents. For safety considerations, doors should not be propped. Entrance and emergency doors at the Residential and Academic Facility and TWC Headquarters are alarmed; any tampering will result in the appropriate authorities will be contact.

- Building management and/or TWC staff reserve the right to assess damages to an entire suite, floor, or building for any damages to or excessive trash left in any of the building common areas, including trash rooms, lounges, classrooms, the fitness center, or public restrooms.

## V. The Conduct Process

### a. Enforcement of the TWC Code of Conduct

- All TWC personnel and participants who encounter or work with student participants must uphold and enforce the TWC Code of Conduct.

### b. Responses to Policy Violations

- The following list details possible sanctions for policy violations. Intention, severity, timing and impact on the community will be considered when determining appropriate responses to policy violations.
- Overall, the following categories are options for responding to policy violations:
  - As part of ensuring our communities safety and health, any policy violation that is a direct violation of the social distancing and/or other CoVid recommendations adapted by TWC will result in immediate expulsion from our programs and housing. There will be no warnings.
- **Conduct Probation:** A period of time assigned as a sanction by the judicial representative as a period of warning to address behavioral issues. During probationary periods, further violations could result in higher-level sanctions.
- **Course and/or Assignment Failure:** A failing grade for an assignment, course, or program for academic misconduct.
- **Course Withdrawal:** Immediate removal from enrollment in of an academic course, due to academic misconduct.
- **Educational Task:** An assigned learning opportunity that allows for self-reflection on specific behavior, as well as impact on community values and living. Educational tasks may take the form of seminars, workshops, one on one meetings with staff, research projects, etc...
- **Eviction:** Removal from TWC housing facilities. This may include prohibiting students to visit any TWC facility as a guest of another participant, depending on the severity of the issue.
- **Expulsion:** Removal from all TWC program components for Internships and/or Academic Seminars. This also includes removal from TWC housing, if applicable.
- **Legal/Medical Referral:** In instances of criminal activity or health concerns, outside professionals may be utilized.
- **Loss of Privileges:** The TWC Official may revoke privileges originally provided through the Code of Conduct, such as the privilege of having visitors, the privilege to have or consume alcohol within a unit, or the privilege to have overnight guests.
- **Order of No Contact:** At any time, TWC Officials may issue an order of “no contact” to TWC participants. This means that participants are not allowed to contact another individual by talking or communicating to them via any means of technology. Also, residents are not allowed to go to the other individual’s apartment or attempt to make contact them in any form. TWC Officials will communicate the specifics of “no contact” upon implementation.
- **Restitution/Fines/Withholding Stipends:** Used in instances deemed appropriate by The Washington Center for policy violations.
- **Verbal Warning:** Used when the violation is minor and may be paired with the following sanctions: an educational task, restitution, order of “no contact,” removal of unauthorized or

offensive property, or requirement that an academic assignment be completed. A verbal warning does not have to be issued prior to conduct charges.

- **Written Warning:** Used when the violation necessitates an official record. A written warning may result in the following sanctions: an educational task, restitution, prohibiting further contact with designated person(s), removal of unauthorized or offensive property, or requirement that an academic assignment be completed. A copy of the written warning is recorded with The Washington Center. NOTE: A participant may only receive one written warning for the same policy violation and should receive no more than two written warnings in the same term. A written warning does not have to be issued prior to conduct charges.

c. Response to Harassment / Sexual Misconduct

- Communicating possible harassment is **EVERY Participant of TWC's** responsibility.
- Our response to information can be critical into how that situation is addressed and resolved. Failure to follow protocol or to act can create a major liability for TWC. Harassment by or towards any TWC participant or TWC staff member is **not permitted and will not be tolerated** by TWC.

## VI. Conduct Violation Communication Procedures

Adherence to the step-by-step protocols listed below will facilitate clear communication and appropriate action in a timely manner. All student/staff members should be familiar with the Code of Conduct in order to recognize and enforce TWC policy.

**Step One → *Verbal initiation of conduct process*** – staff member may provide a verbal warning to student. This verbal warning should explain the behavior, the expectations and the community impact. Verbal warnings should be recorded for potential future use. For repetitive or severe violation, staff member should move immediately to step two.

**Step Two → *Written initiation of conduct process*** – staff member recognizing the Code of Conduct violation will submit incident report along with relevant documentation to person found on the Student Experience distribution list below. The Student Experience team will review the document and discuss this case with the reporting staff member.

**Step Three → *Informing key stakeholders*** – After reviewing the incident report and supporting documents, the Student Experience team member will summarize the situation and initial action in an email to be sent to [conduct@twc.edu](mailto:conduct@twc.edu). The incident report should be uploaded onto StarRez and not included in email.

The subject line will include “Conduct Violation – [Student Name] – [Type of Violation].”

The Student Experience distribution list includes {department – staff (stakeholders)}:

- Courses – Senior Manager, Vice President, Academic Affairs and Career Readiness (evening course professors)
- Programs – Senior Manager, All Programs (Career Advisors, students, customized and AIP)
- Executive – Vice President of Student Affairs, Vice President, Academic Affairs and Career Readiness, Chief Academic Officer (Executive, Communications)
- OCUR, Enrollment – Director of Enrollment (liaisons, school)
- OCUR, College and University Relations – Director of College and University Relations (liaisons, school)
- OISR – Director of Internship Site Relations (internship site)
- Student Services – Manager of Community Life (Alumni Mentors, medical services, Housing)

\* In the event of an international student, include Senior Director of Enrollment Services and International Strategic Partnerships department.

**Step Four → *Discovery and Investigation*** - The Student Experience team will assign a staff member to conduct a discovery and investigation process to provide additional details, clarification, and data in reference to the potential violation(s).

**Step Five → *Conduct process, adjudication, and appeals*** – A student experience team member will email the student a formal violation letter. A copy of this letter will be provided to the student’s Career Advisor. At a minimum, this letter will include the name of student, citation of the violation, previous warning (if applicable), sanction, and instructions for appeal.

Step Six → *Close communication* – Appeals must be filed by student within 36 hours of the delivered sanction. After such time, a Student Experience team member will communicate with the Student Experience team and reporting staff member that either the student will complete the prescribed sanction or has appealed. If appealed, the appeals officer will communicate the final decision to the Student Experience team and reporting staff member.

- The participant's campus liaison (if applicable) will be notified of the outcome of the conduct process, upon conclusion. Incidents of misconduct may also be reflected in a student's final evaluation or grade. Lastly, incidents of academic misconduct may affect a student's financial aid, especially if the incident results in expulsion from a TWC program for which aid is provided.
- Due to the impact on the safety and health of our community, violations of our COVID protocols will not be granted an appeal process under TWC's processes.

## VII. Appeals Process for Conduct Sanctions

Participants found in violation of any TWC policy or who have outstanding financial matters have the right to an appeal to the next level of the conduct process. Please note that verbal warnings, written warnings, and orders of no contact are not subject to appeal.

A notice of intent to appeal must be submitted in writing within 72 hours of the date of sanctioning. This notice is simply a written message from the charged student stating that “I intend to appeal the sanction issued on [sanction date] by [conduct officer/hearing board]”. This message may be e-mailed to [conduct@twc.edu](mailto:conduct@twc.edu) and notifies the conduct officer that you plan to appeal, although the issued sanction may be upheld pending the appeal resolution.

After thoroughly reviewing the sanction letter, the student may submit a detailed appeals statement on any of the following grounds:

- Insufficient information that a policy was violated;
- Sanction inappropriate or not commensurate with the violation;
- New information presented that was unavailable at the time of conduct meeting that could affect the outcome of the case.

When an appeal is filed, the entire conduct file relating to the specific incident will be sent to the appeals officer(s). Appeals will be heard by the corresponding officer in the next level. Final appeals will be heard by the executive member with oversight for the area of the violation or by an appeals board convened by the executive member. For example, final academic appeals could be heard by the Chief Academic Officer and/or their designee.

- Due to the impact on the safety and health of our community, violations of our COVID protocols will not be granted an appeal process under TWC’s processes.

All delivered sanctions are upheld until the appeal process is completed (e.g. intern removal from housing or program stands until appeal is processed).

A decision regarding the appeal will be determined within 10 business days. The original sanctioning may be modified, removed, or increased to a new level, including expulsion.

## VIII. Conduct Process and Appeals Hierarchy

The conduct process is outlined below with a brief summary of each step in the process. The outline below depicts the appropriate TWC judicial officer that will investigate the incident and follow the conduct process as outlined above.

Levels, their appropriate judicial officers, and potential sanctions are listed below:

- Level 1 – First-time and/or Low-level violations of Sections 1 – 3 of Code of Conduct
  - Judicial Officers:
    - o Manager of Alumni Mentors, for incidents submitted through Incident Report submitted by Alumni Mentor;
    - o Manager or Vice President of Academic Affairs and Career Readiness, for incidents/reports from course instructor or faculty member;
    - o Career Advisors/Program Managers, for incidents/ reports relating to TWC program participation
  - **Potential Sanctions:** Verbal Conduct Warning; Written Conduct Warning; Educational Task; Conduct Probation; Restitution/Fines
  -
- Level 2 – Multiple and/or Severe violations of Sections 1 – 3 of Code of Conduct
  - Judicial Officers:
    - o Director of Student Services and Community Life, for all incidents happening in TWC and affiliated housing;
    - o Senior Manager, Programs, for incidents occurring within the Academic Internship Program, Customized Programs, and Courses
    - o Director of Academic Internship Programs, incidents happening in AIP and VIP programs
    - o Director, Federal Relations, for incidents involving participants enrolled through federal contracts;
    - o Program Manager/International Programs, for participants enrolled in special international programs
  - **Potential Sanctions:** Conduct Probation; Course and/or Assignment Failure; Course Withdrawal; Educational Task; Eviction; Verbal Conduct Warning; Legal/Medical Referral; Written Conduct Warning
- Level 3 – Billing concerns; Violations of the Code of Conduct warranting housing eviction or program expulsion
  - Judicial Officers:
    - o Vice President of Student Affairs;
    - o Vice President of Academic Affairs and Career Readiness (or designee);
    - o Conduct Board, for cases as determined by the Vice President of Student Affairs or Vice President of Academic Affairs and Career Readiness.
  - **Potential Sanctions:** Written Conduct Warning; Educational Tasks; Conduct Probation; Course Removal; Restitution/Fines; Legal/Medical Referral; Eviction; Program Expulsion

- Other TWC Staff Involved in the Conduct Process
  - **Academic Affairs, Internship Site Relations, Federal Relations, and Academic Internship Program staff.** This classification includes program staff affiliated with any of TWC's programs, including but not limited to the Academic Internship Program, Academic Seminars, Customized Programs, and Federal Initiatives.
  - **Office of International Strategic Partnerships.** Cases involving participants for whom English is not their first language may request or be assigned a member of the International Strategic Partnerships team to serve as a liaison to ensure full student and staff understanding and engagement with the conduct process. The J-1 Visa Officer will also be involved, as a student's visa status can be affected by the conduct process.
  - **Office of College and University Relations.** Depending on the severity of the case, the Director of Admissions and Institutional Relations (or designee) will ensure that campus liaisons are included in the conduct process (or notify appropriate staff of violations). Instances where the campus liaison will be contacted include the outstanding balances that impact program continuation, academic performance with potential impact on program success, internship removal, and high-level student issues (medical and other emergencies, other situations with ramifications on student experience).

# IX. Participant Rights

## Dissemination of Student Record Information

Although not applicable to The Washington Center, we follow the guidelines associated with FERPA (Family Educational Rights and Privacy Act) and HIPAA (Health Insurance Portability and Accountability Act) in reference to the rights and privacy of TWC participants. In order to share information with other individuals, TWC requires participants to permit the organization to do so. In the event of an emergency situation, the Office of Student Services and Community Life will make an informed decision on contacting emergency contacts with information based on individual situations. Due note, information can and will be shared with the student's academic institution.

## Good Samaritan Provision

The health and safety of The Washington Center participants is of the highest priority. At times, participants may need immediate medical or other professional assistance. However, participants may be reluctant to get help because of concerns that their own behavior may be a violation of the Code of Conduct. To minimize any hesitation participants may have in obtaining help due to these concerns, TWC has enacted the following "Good Samaritan" provision. Although policy violations cannot be overlooked, TWC will consider the positive impact of reporting an incident when determining the appropriate response for policy violations. In such cases, any possible negative consequences for the reporter of the problem should be evaluated against the possible negative consequences for the participant needing assistance. At a minimum, participants should make an anonymous report that would put the individual in need in touch with Student Services Staff.

## Grievances

If a participant has an issue with any TWC staff member or process, a grievance may be filed to initiate an investigation and follow-up on the concern.

- Grievances related to orientation, housing, student activities, disability accommodations, or community programs/events may be submitted in writing to the Office of Student Services & Community Life at [conduct@twc.edu](mailto:conduct@twc.edu).
- Academic course grievances, issues with course instructors or faculty, or concerns about the course material, class format, etc.... may be submitted in writing to Courses at [courses@twc.edu](mailto:courses@twc.edu).
- Program grievances may be filed with the Senior Manager, Student Conduct and Case Management at [programs@twc.edu](mailto:programs@twc.edu).

## Notification of Conduct Violations

TWC support staff will be notified of the outcome any documented conduct process involving a student via e-mail. These staff members include, but are not limited to, the appropriate program staff, the Alumni Mentors, the Manager of Community Life, the Director of Student Services and Community Life, the Vice President of Student Affairs, Vice President of Academic Affairs and Career Readiness, Vice President of Customized and Federal Initiatives, the Chief Academic Officer, and the Chief Operations Officer.

College and university liaisons, along with the Dean of Students or the unit that handles student conduct policies at the participant's home institution (if necessary), may be notified if the participant is involved in a violation that requires specific university response, in accordance with local, state, and national policies

- Liaisons may also be notified if the participant is placed on conduct probation. Any conduct violations that take place 7 days prior to leaving The Washington Center may be forwarded to the participant's home institution for adjudication. The home institution will have the authority to apply sanctions based upon their respective student conduct processes.
- Title IX or Clery Act: While not applicable to The Washington Center, TWC chooses to follow the best practices established by the Department of Education and may determine to contact the Title IX Coordinator or Administrator at the student's campus in lieu of the liaison; unless otherwise directed by the Dean of Students on the appropriate campus.

## Complainant Rights

Complainants may seek and receive an order of no contact against another individual who has engaged in or threatens to engage in stalking, threatening, harassing, or other improper behavior that presents a danger to the welfare of the complaining intern.

To seek proper redress, a complainant of any form of harassment is encouraged to contact the Vice President of Student Affairs, who will activate the response protocol to investigate and support all involved parties on behalf of The Washington Center.

Complainants will be treated with respect by TWC officials.

Complainants will not be discouraged from reporting to officials.

Complainants may be informed of the outcome and sanction of any disciplinary hearing involving sexual misconduct.

Complainants will be informed in a timely manner of their options to notify proper law enforcement authorities. Complainants should be notified of available counseling, mental health or student services for complainants of sexual misconduct, both at TWC and in the community.

Complainants should be notified of and made aware of options for, and provided assistance in changing academic and living situations after an alleged sexual assault, if so requested by the complainant and if such changes are reasonably available.

The irrelevant prior sexual history of a complainant should not be admitted in a hearing.

Complainants should be permitted to make a complainant-impact statement to the hearing officer or body and to have that statement considered by the hearing officer or body in determining its sanction.

Complainants have the right to submit a written statement to the appellate board in cases of appeal.

## Respondent Rights

The respondent should be treated with respect and accorded all appropriate rights based on TWC policies and procedures.

The respondent may refuse to answer some or all questions with the understanding that silence should not be used against him or her.

The respondent may question witnesses at a hearing.

The respondent should be notified of the outcome and sanction of the hearing and/or conduct procedure.

The respondent may appeal the outcome of their case under certain circumstances, as outlined in Section 4: Conduct Process.