



## **The Christ College of Nursing and Health Sciences**

### **2019 ANNUAL SECURITY REPORT**

#### **Introduction**

This report is provided in compliance with the Jeanne Clery Disclosure of Campus Security Policy and Crime Statistics Act, as amended. It provides students and employees of The Christ College of Nursing and Health Sciences ("College") with information on: the College's security arrangements, policies and procedures; programs that provide education on such things as drug and alcohol abuse, awareness of various kinds of sex offenses, and the prevention of crime generally; and procedures the College will take to notify the campus community in the event of an emergency. Its purpose is to provide students and employees with information that will help them make informed decisions relating to their own safety and the safety of others.

#### **Policy for Preparing the Annual Report**

This report is prepared by the Associate Dean of Compliance in cooperation with local law enforcement authorities and includes information provided by them as well as by the College's campus security authorities and various other elements of the College. Each year an e-mail notification is made to all enrolled students and employees that provides the website link to access this report. Prospective students and employees are also notified of the report's availability. Hard copies of the report may also be obtained at no cost by contacting Jessica Dunkley, Assistant to the President, The Christ College of Nursing, 2139 Auburn Avenue, Cincinnati, OH, 45219, 513-585-0032.

The College is committed to taking the actions necessary to provide a safe and secure working/learning environment for all students and staff. As a member of the campus community, you can feel safe and comfortable knowing that security procedures are in place that represent best practices in the field and are constantly tested and re-evaluated for their effectiveness.

#### **General Safety and Security Policies**

##### **Campus Security Personnel & Relationship with Local Law Enforcement**

The Christ Hospital Safety and Security Department is responsible for campus safety at the College.

Its personnel do not have arrest authority. The security department's jurisdiction covers all of the College's on-campus property which lies on the Christ Hospital Health Network campus at 2139 Auburn Avenue. This includes the following property:

- Property from 2223 to 2135 Auburn Avenue with the exception of the Baptist Church located at 2147 Auburn Avenue, extending west and bordered by an unbroken fence and/or wall that extends to Justis Street and to Gage Street and surrounds the P3 parking garage.
- P2 parking lot and P1 parking garage (located within the Mason Street, Eleanor Place, Huntington Place and Auburn Avenue perimeters).
- P3 parking garage and driveway off Eleanor Place and 2066-2098 Eleanor Place.
- P5 parking lot located at 108-148 Huntington Place – up to and including the fence border surrounding the lot.
- The contracted portion of the first floor and parking lot at 2025 Reading Road effective August 26, 2019.
- Use of the parking area January 7-April 26, 2019 at the Central Business Office (CBO), the geography will include the area within the addresses noted below:
  - 134-204 McMillan Avenue
  - 2501-2538 Highland Avenue
  - 219-237 William Howard Taft Road

**Non-campus buildings or property** (areas are date specific) - The Baldwin parking garage is not in our Safety and Security (S&S) Department's jurisdiction, but it is covered by another security company. Our S&S department has offered additional support there.

From January 8-April 27, 2018 and August 28-December 15, 2018:

- Baldwin parking garage located at 655 Eden Park Drive
- Baldwin driveway to the garage

While the College does not have any written agreements with local law enforcement agencies, it does maintain a close working relationship with local police. Officers in the Safety and Security Department have received private police and security training. In extreme emergencies, Safety and Security will contact the Cincinnati Police Department to assist.

Criminal activity for campus geography locations are monitored by the local Cincinnati Police Department, District 4. Crime statistics are obtained through this district and the police captain of District 4 has been asked to report ongoing threats to our campus community to our Safety and Security department immediately so timely warnings can be sent as needed.

### **Campus Security Authorities**

The College has designated certain officials to serve as campus security authorities. Reports of criminal activity can be made to these officials. They in turn will ensure that the crimes are reported for collection as part of the College's annual report of crime statistics. The campus security authorities to whom the College would prefer that crimes be reported are listed below.

- Associate Dean of Compliance and Title IX Coordinator at 513-585-2055 or [Maureen.Schwab@thechristcollege.edu](mailto:Maureen.Schwab@thechristcollege.edu)
- Deputy Title IX Coordinator and Consultant – Diversity, Equity, and Inclusion at 513-585-0180 or [Anita.Frazier@thechristcollege.edu](mailto:Anita.Frazier@thechristcollege.edu)
- Dean of Academic Support Services at 513-585-4841 or [Meghan.Hollowell@thechristcollege.edu](mailto:Meghan.Hollowell@thechristcollege.edu)
- TCH Safety and Security Department at 513-585-2222
- Secretary, Administrative at 513-585-2433 or [Peggy.Nicholas@thechristcollege.edu](mailto:Peggy.Nicholas@thechristcollege.edu)
- Secretary, Administrative at 513-585-2401 or [Leeann.Ballard@thechristcollege.edu](mailto:Leeann.Ballard@thechristcollege.edu)
- Secretary, Administrative at 513-585-3598 or [Sandie.Blessing@thechristhospital.com](mailto:Sandie.Blessing@thechristhospital.com)
- Dean of Enrollment Management at 513-585-0116 or [Bradley.Jackson@thechristcollege.edu](mailto:Bradley.Jackson@thechristcollege.edu)
- Dean of Health Sciences, Chief Academic Officer at 513-585-3747 or [Robert.Kallmeyer@thechristcollege.edu](mailto:Robert.Kallmeyer@thechristcollege.edu) (effective April 15, 2020)
- Dean of Nursing, 513-585-0941 or [Connie.McFaddenChase@thechristcollege.edu](mailto:Connie.McFaddenChase@thechristcollege.edu) (effective April 15, 2020)

### **Reporting a Crime or Emergency**

The College encourages accurate and prompt reporting of all criminal actions, emergencies, or other incidents occurring on campus, on other property owned by the College, or on nearby public property to the appropriate administrator and appropriate police agencies. Such a report is encouraged even when the victim of a crime elects not to make a report or is unable to do so.

Report the incident to the Safety and Security Department by calling 513-585-2222 or in the case of an emergency you can also dial 911. It is important that the person reporting the emergency or unusual activity be able to supply as much of the following information as possible:

- What is the nature of the emergency or unusual activity? (i.e. fire, assault, auto accident, apparent heart attack, bomb threat, personal attack, theft in progress, suspicious person or vehicle, power outage, natural gas leak, burst pipe, water damage, etc.)
- Are there personal injuries? How many people are hurt?
- What is the exact location of the emergency or suspicious activity?
- Name, telephone number and position (student, employee) of the person making the report?

### **Confidential Reporting**

The College will protect the confidentiality of victims. Only those with a need to know the identity for purposes of investigating the crime, assisting the victim or disciplining the perpetrator will know the victim's identity.

Pursuant to the College's sexual misconduct policy, when an employee who is not a confidential resource becomes aware of alleged misconduct under that policy (including, but not limited to, dating violence, domestic violence, sexual assault, and stalking), the employee is responsible for reporting that information, including the status of the parties if known, to the Title IX Coordinator. A victim of other

types of crimes (e.g., aggravated assault, burglary, etc.) who does not want to pursue action within the College disciplinary system or the criminal justice system is nevertheless encouraged to make a confidential report to a campus security authority. Upon the victim's request, a report of the details of the incident can be filed with the College without revealing the victim's identity. Such a confidential report complies with the victim's wishes, but still helps the College take appropriate steps to ensure the future safety of the victim and others. With such information, the College can keep an accurate record of the number of incidents involving members of the campus community, determine where a pattern of crime may be developing and alert the community as to any potential danger. These confidential reports are counted and disclosed in the annual crime statistics for the College.

Students who report sexual/physical assault crimes are encouraged to contact the Title IX Coordinator, Maureen Schwab or the Deputy Title IX Coordinator, Dr. Meghan Hollowell. Students who report sexual/physical assault crimes to the Confidential Reporters at IMPACT Student Life Assistance will be notified that IMPACT does not disclose their identity to the College, but that IMPACT will notify the College that the incident occurred. This process will help to identify problems and take steps to protect the College community. If the student wishes for the incident to be reported to the College, IMPACT will then provide the College with a Contact Name, Phone Number, and copy of the incident report for additional details.

Following an intake call or disclosure of such an incident later in the counseling process, IMPACT staff will complete a "Non-Identifying Incident Report" and fax it to the Associate Dean, Compliance.

The College encourages its pastoral and professional counselors, if and when they deem it appropriate, to inform the person they are counseling to report crimes on a voluntary, confidential basis for inclusion in the annual report of crime statistics.

### **Security of and Access to Campus Facilities**

The Christ Hospital and The Christ College are private institutions and reserve the right to restrict access and movement on their grounds to staff, students, patients, visitors and others who are conducting business on site. Students and staff are issued I.D. badges. Your I.D. badge serves as your access card to enter parking lots and hospital and College doors and to identify you on the campus and while participating in College activities. All students, faculty and staff are to wear their badges whenever on TCCNHS property or engaged in College activities. Persons without an identification badge visible may be asked to identify themselves and/or to properly display their badge. I.D. badges cannot be transferred to anyone else under any circumstance.

If you lose your I.D. badge, report it immediately to Safety and Security at x52222. Current students needing replacement badges should do the following:

1. Provide the \$15.00 payment fee to the Bursar in the Student Accounts Office. Students will be given a notice of payment receipt which they must bring when obtaining their new badge. If your badge has been stolen the \$15.00 replacement fee will be waived if documentation such as a police report or written statement from security, can be provided.
2. Contact the Registrar, 513-585-0365, to schedule an appointment for photo (if needed) and badge reissue.

Student and employee access to the College is by badge only. Students may gain entrance with their access card seven days a week from 5:00 a.m. to 11:00 p.m. Students who do not have their badge with them and visitors may be granted access into the building from 8-4:30 by the receptionist. Upon entering, they must sign in and wear an identification badge provided at the front desk. Upon exiting,

they must sign out and return the identification badge. Recurrent failure to utilize and wear an identification badge may result in disciplinary action for students and employees. The College may be closed to access during extended periods over holiday breaks. These periods will be communicated to students, faculty, and staff via College email.

### **Security Considerations in the Maintenance of Facilities**

Risk reduction involves creating an environment which is unfavorable to crime, such as well-lit pathways, egress lighting in hallways and stairwells, and environmental maintenance as well as creating a culture of awareness and caring. Variations in the above areas, such as non-working lights are reported to the College's receptionist who notifies the Christ Hospital Facilities Management Department for rapid repair of the concern.

Both the external and internal areas of the college campus are maintained each business day by The Christ Hospital Facilities Management ground crew (externally) and a private cleaning service internally. Landscaping is regularly trimmed and monitored. Safety and Security officers routinely patrol campus areas.

### **Educational Programs Related to Security Awareness and Prevention of Criminal Activity**

The College seeks to enhance the security of its campus and the members of the campus community by periodically presenting educational programs to inform students and employees about campus security procedures and practices, to encourage students and employees to be responsible for their own security and the security of others and to inform them about the prevention of crimes. These programs are discussed below.

Educational prevention and awareness programs are provided throughout the year with the average frequency of at least twice monthly for all employees and students of the College. Additionally, safety issues are discussed at orientation programs at the beginning of each semester and in new employee orientation.

The College provides information at least at the beginning of each academic semester for students and employees regarding the College's security procedures and practices. Digital messaging and e-mail blasts are sent out to students and employees with crime prevention and other safety tips. Among other things, it advises students and employees of the importance of reporting criminal activity, to whom crimes should be reported, being responsible for their own safety and the safety of others and practices regarding timely warnings and emergency notifications.

Regular notifications are sent regarding safety changes to egress to the building, shuttle and building hours. Additional TV messages, posters, fliers, emails, drills, and emergency messaging tests are provided.

### **Monitoring Off Campus Locations of Recognized Student Organizations**

The College does not have any officially recognized student organizations with off campus locations and therefore does not monitor or record criminal conduct occurring at such locations.

### **Disclosure of the Outcome of a Crime of Violence or Non-Forcible Sex Offense**

Upon written request, the College will disclose to the alleged victim of a crime of violence (as that term is defined in section 16 of title 18, United States Code), or a non-forcible sex offense, the report on the results of any disciplinary proceeding conducted by the College against a student who is the alleged

perpetrator of such crime or offense. If the alleged victim is deceased as a result of such crime or offense, the next of kin of such victim shall be treated as the alleged victim for purposes of the paragraph.

The previous paragraph does not apply to victims of dating violence, domestic violence, sexual assault, or stalking because under the Violence Against Women Act both the accused and accuser in these cases are given the results without the need to make a written request.

## **Drug and Alcohol Policy**

The Christ College of Nursing and Health Sciences (TCCNHS) seeks to provide an environment in which students may experience intellectual, emotional, physical, social and personal growth. The development of the capacity to make informed decisions about drugs and responsible choices about the consumption of alcohol is a significant component of a student's personal growth, supported by TCCNHS policies, resources and educational opportunities.

Alcohol use and illegal drug use is prohibited on the campus of TCCNHS. This includes the use of prescription drugs for purposes other than prescribed, and use of prescription drugs prescribed for someone else. TCCNHS Drug and Alcohol Policies also prohibit the illegal possession, sale, manufacture, or distribution of alcohol and illegal drugs on the school's property or as part of any of the school's activities. The College enforces state underage drinking laws and federal and state drug laws. The misuse of substances that present physical or psychological hazards to individuals is also prohibited. TCCNHS Drug and Alcohol Policies apply to all students and to student organizations that conduct activities on and off campus. See the link below for the drug and alcohol policies including health risks, rehabilitation resources, federal, state, local legal sanctions and collegiate (including financial aid) implications.

If a student is found in violation of TCCNHS Drug and Alcohol Policies, sanctions determined by College administration could include but are not limited to written warning, parental notification, educational sanction (a required activity that engages the student in a positive learning experience), limitations on activities, restitution, probation, suspension or dismissal from the College.

The College enforces the state's underage drinking laws and complies with state law and other applicable regulations governing alcoholic beverages and the possession, use, and sale of illegal drugs for those on the College's premises or participating in its activities.

## **Drug and Alcohol Abuse Prevention Program**

The College has a drug abuse and prevention program and conducts a biennial review of this program to evaluate its effectiveness. More information about the program, including the College's drug and alcohol policies, can be located in the Student Policies portion of the College Catalog and is accessible in Blackboard at <https://thechristcollege.blackboard.com/bbcswebdav/institution/Compliance/Drug%20and%20Alcohol%20Policies.pdf>.

College resources that support informed and responsible decisions regarding the use of drugs and alcohol include but are not limited to IMPACT Student Life Assistance and centralized, on-campus advising. IMPACT is a free and confidential counseling service available to help students manage personal and academic stressors and demands. All IMPACT counselors are masters and doctoral level professionals, qualified to help steer students toward healthy decision-making skills, daily living resources and referral assistance. IMPACT provides students and their household members and

dependents with access to 24/7 in-the-moment support, and up to three face-to-face counseling sessions per issue. All TCCNHS students are also assigned an on-site academic advisor within the Student Success Department. Advisors are in consistent communication with students and can provide information about relevant resources like IMPACT, as needed. Importantly, College faculty and staff members too are educated about IMPACT Student Life Assistance. Academic advisors and faculty/staff are provided with IMPACT business cards that can be used to easily refer students who might benefit from the resource. Finally, the TCCNHS College Catalog identifies for students several local rehabilitation resources for students with a chemical dependency, including the Center for Chemical Addictions Treatment, Alcohol Anonymous Cincinnati, and the Alcoholism Council of the Cincinnati Area. A description of the services offered by these resources and the resource's website address are provided.

In addition to the resources that are available for students in need of guidance regarding responsible drug use and alcohol consumption, educational opportunities designed to influence responsible decision making are also provided both inside and out of TCCNHS classrooms. Student programs are offered each semester by the Student Success Department to directly address responsible drug use and alcohol consumption with students. Courses like FYE 102 (First Year Experience) address stress management and mental and physical wellness, in addition to orienting students with the resources previously mentioned. IMPACT also provides TCCNHS with educational documents that directly address drug use and alcohol consumption, including their health effects and legal penalties for violating related laws, and those documents are made available to students on the Student Success Department's page in Blackboard. Alcohol and other drug brochures are available in multiple locations around the campus.

Employees of the College are also subject to policies related to alcohol and drugs, and these policies are available through The Christ Hospital Health Network (TCHHN) at <http://mytch.tchhn.org/Forms/layouts/15/WopiFrame2.aspx?sourcedoc=/Forms/HR/Drug%20Free%20Workplace%20.pdf&action=default&DefaultItemOpen=1>. These policies prohibit the use, possession, manufacture, or sale of controlled/illegal drug or alcohol while on duty, while on campus, or as any part of the College's programs and activities. Violations of these policies may result in disciplinary action up to and including termination of employment. Internally, employees have the Employee Assistance Program (EAP) available for treatment and support.

Community support programs are also available for both employees and students. An extensive listing of qualified resources is available in the biennial report on Alcohol and Other Drugs which is distributed to all employees and students. Alcohol and Other Drug policies that list support programs are distributed, at least annually, and are available from the Associate Dean of Compliance, Maureen Schwab, at 513-585-2055 or [Maureen.Schwab@thechristcollege.edu](mailto:Maureen.Schwab@thechristcollege.edu).

Drug and Alcohol Abuse Training is either the entire focus or part of all of the following trainings provided throughout the year:

- Alcohol and Drug Awareness: This face-to-face program focuses on teaching participants about the choices available and how to respond when in situations involving alcohol. Emphasis is placed on making safe and smart choices. Local law enforcement speaks with attendees, "intoxication goggles" simulating varying levels of intoxication are used while attendees attempt to navigate by walking a cone course. Statistics on poor choices regarding alcohol are available including: injury/health problems, assault, sexual implications, behavioral changes, and academic, health, and legal consequences.
- Healthy Living: Dealing with Stress— This program focuses on helping students manage and reduce their stress levels to promote healthy living. Students will have the opportunity to take part in stress-relief activities and will learn techniques to help them live a healthy life. Students

should leave the program more relaxed, confident, and knowledgeable about stress triggers and stress management. Alcohol use is addressed as part of this program.

- **Safety and Wellness Training: Legal Nuts and Bolts: Alcohol and Other Drugs (AOD):** This program’s goals for the participant are to describe key components of TCCNHS AOD policy, identify two actions of AOD in the body; Identify two effects of AOD misuse, Identify three resources to help with AOD problems, and identify three legal sanctions for AOD violations.
- **Personal Safety:** This program is presented by TCH S&S and explores how to be safe (primarily) on campus. Students will learn vehicles safety, off campus housing safety, how to avoid being a victim of an opportunity crime, and how alcohol use can lead to a higher risk of being a victim of a crime. They will learn how to contact the S&S Department and how to use the Assistance Phones. This program usually occurs midway through the semester.
- Programming includes drug and alcohol information in flier format on all floors of the College, digital signage and email messaging sent throughout the year.

**Policies, Procedures, and Programs Related to Dating Violence, Domestic Violence, Sexual Assault, and Stalking**

Consistent with applicable laws, the College prohibits dating violence, domestic violence, sexual assault, and stalking. The College’s policy used to address complaints of this nature, as well as the procedures for filing, investigating and resolving complaints, may be found at:

- Discrimination, Harassment, and Sexual Misconduct Policy: <https://www.thechristcollege.edu/img/content/discrimination-harassment-and-sm-policy-2.8.19.pdf>
- Non-discrimination and Title IX: <https://www.thechristcollege.edu/non-discrimination-and-title-ix/>

The following sections of this report discuss the College’s educational programs to promote the awareness of dating violence, domestic violence, sexual assault and stalking; provides information concerning procedures students and employees should follow and the services available in the event they do become a victim of one of these offenses; and advises students and employees of the disciplinary procedures that will be followed after an allegation that one of these offenses has occurred.

**Primary Prevention and Awareness Program:**

The College conducts a Primary Prevention and Awareness Program (PPAP) for all incoming students and new employees. The PPAP advises campus community members that the College prohibits the offenses of dating violence, domestic violence, sexual assault and stalking. They are also informed of the topics discussed below, including relevant definitions, risk reduction, and bystander intervention.

Crime Definitions

<b>Crime Type (Ohio Revised Code)</b>	<b>Definitions</b>
Dating Violence	The institution has determined, based on good-faith research, that Ohio law does not define the term dating violence.

Crime Type (Ohio Revised Code)	Definitions
Domestic Violence (Ohio Rev. Code § 2919.25)	<p>A person is guilty of domestic violence if violating any of the following provisions: (A) No person shall knowingly cause or attempt to cause physical harm to a family or household member; (B) No person shall recklessly cause serious physical harm to a family or household member; (C) No person, by threat of force, shall knowingly cause a family or household member to believe that the offender will cause imminent physical harm to the family or household member.</p> <p>“Family or household member” means any of the following: (a) Any of the following who is residing or has resided with the offender: (i) A spouse, a person living as a spouse, or a former spouse of the offender; (ii) A parent, a foster parent, or a child of the offender, or another person related by consanguinity or affinity to the offender; (iii) A parent or a child of a spouse, person living as a spouse, or former spouse of the offender, or another person related by consanguinity or affinity to a person, living as a spouse, or former spouse of the offender; (b) The natural parent of any child of whom the offender is the other natural parent or is the putative other natural parent.</p>
Stalking (Ohio Rev. Code § 2903.211(A))	<p>The following constitutes “menacing by stalking” under Ohio law: (1) No person by engaging in a pattern of conduct shall knowingly cause another person to believe that the offender will cause physical harm to the other person or a family or household member of the other person or cause mental distress to the other person or a family or household member of the other person. In addition to any other basis for the other person's belief that the offender will cause physical harm to the other person or the other person's family or household member or mental distress to the other person or the other person's family or household member, the other person's belief or mental distress may be based on words or conduct of the offender that are directed at or identify a corporation, association, or other organization that employs the other person or to which the other person belongs; (2) No person, through the use of any form of written communication or any electronic method of remotely transferring information, including, but not limited to, any computer, computer network, computer program, r-computer system, or telecommunication device shall post a message or use any intentionally written or verbal graphic gesture with purpose to do either of the following: (a) Violate division (A)(1) of this section; (b) Urge or incite another to commit a violation of division (A)(1) of this section; (3) No person, with a sexual motivation, shall violate division (A)(1) or (2) of this section.</p>
Sexual Assault	<p>The institution has determined, based on good-faith research, that Ohio law does not define the term sexual assault.</p>
Rape, Fondling, Incest, Statutory Rape	<p>For purposes of the Clery Act, the term “sexual assault” includes the offenses of rape, fondling, incest, and statutory rape. These definitions under Ohio law are as follows:</p> <ul style="list-style-type: none"> <li>• Rape (Ohio Rev. Code §2907.02): <ul style="list-style-type: none"> <li>▪ No person shall engage in sexual conduct with another who is not the spouse of the offender or who is the spouse of the offender but is living</li> </ul> </li> </ul>

<b>Crime Type</b> <b>(Ohio Revised Code)</b>	<b>Definitions</b>
	<p>separate and apart from the offender, when any of the following applies:            (a) For the purpose of preventing resistance, the offender substantially impairs the other person's judgment or control by administering any drug, intoxicant, or controlled substance to the other person surreptitiously or by force, threat of force, or deception; (b) The other person is less than thirteen years of age, whether or not the offender knows the age of the other person; (c) The other person's ability to resist or consent is substantially impaired because of a mental or physical condition or because of advanced age, and the offender knows or has reasonable cause to believe that the other person's ability to resist or consent is substantially impaired because of a mental or physical condition or because of advanced age.</p> <ul style="list-style-type: none"> <li>▪ No person shall engage in sexual conduct with another when the offender purposely compels the other person to submit by force or threat of force.</li> </ul> <ul style="list-style-type: none"> <li>• Fondling: The institution has determined, based on good-faith research, that Ohio law does not define the term fondling.</li> <li>• Incest: The institution has determined, based on good-faith research, that Ohio law does not define the term incest.</li> <li>• Statutory Rape: The institution has determined, based on good-faith research, that Ohio law does not define the term statutory rape.</li> </ul>
Other "sexual assault" crimes	<p>Other crimes under Ohio law that may be classified as a "sexual assault" include the following:</p> <ul style="list-style-type: none"> <li>• Sexual Battery (Ohio Rev. Code § 2907.03): No person shall engage in sexual conduct with another, not the spouse of the offender, when any of the following apply: (1) The offender knowingly coerces the other person to submit by any means that would prevent resistance by a person of ordinary resolution; (2) The offender knows that the other person's ability to appraise the nature of or control the other person's own conduct is substantially impaired; (3) The offender knows that the other person submits because the other person is unaware that the act is being committed; (4) The offender knows that the other person submits because the other person mistakenly identifies the offender as the other person's spouse; (5) The offender is the other person's natural or adoptive parent, or a stepparent, or guardian, custodian, or person in loco parentis of the other person; (6) ...; (7) ...; (8) The other person is a minor, the offender is a teacher, administrator, coach, or other person in authority employed by or serving in an institution of higher education, and the other person is enrolled in or attends that institution; (9) The other person is a minor, and the offender is the other person's athletic or other type of coach, is the other person's instructor, is the leader of a scouting troop of which the other person is</li> </ul>

<b>Crime Type</b> <b>(Ohio Revised Code)</b>	<b>Definitions</b>
	<p>a member, or is a person with temporary or occasional disciplinary control over the other person.</p> <ul style="list-style-type: none"> <li>• Unlawful Sexual Conduct with Minor (Ohio Rev. Code § 29.0704): No person who is eighteen years of age or older shall engage in sexual conduct with another, who is not the spouse of the offender, when the offender knows the other person is thirteen years of age or older but less than sixteen years of age, or the offender is reckless in that regard.</li> <li>• Gross Sexual Imposition (Ohio Rev. Code § 2907.05): <ul style="list-style-type: none"> <li>▪ No person shall have sexual contact with another, not the spouse of the offender; cause another, not the spouse of the offender, to have sexual contact with the offender; or cause two or more other persons to have sexual contact when any of the following applies: (1) The offender purposely compels the other person, or one of the other persons, to submit by force or threat of force; (2) For the purpose of preventing resistance, the offender substantially impairs the judgment or control of the other person or of one of the other persons by administering any drug, intoxicant, or controlled substance to the other person surreptitiously or by force, threat of force, or deception; (3) The offender knows that the judgment or control of the other person or of one of the other persons is substantially impaired as a result of the influence of any drug or intoxicant administered to the other person with the other person's consent for the purpose of any kind of medical or dental examination, treatment, or surgery; (4) The other person, or one of the other persons, is less than thirteen years of age, whether or not the offender knows the age of that person; (5) The ability of the other person to resist or consent or the ability of one of the other persons to resist or consent is substantially impaired because of a mental or physical condition or because of advanced age, and the offender knows or has reasonable cause to believe that the ability to resist or consent of the other person or of one of the other persons is substantially impaired because of a mental or physical condition or because of advanced age.</li> <li>▪ No person shall knowingly touch the genitalia of another, when the touching is not through clothing, the other person is less than twelve years of age, whether or not the offender knows the age of that person, and the touching is done with an intent to abuse, humiliate, harass, degrade, or arouse or gratify the sexual desire of any person.</li> </ul> </li> <li>• Sexual Imposition (Ohio Rev. Code § 2907.06): No person shall have sexual contact with another, not the spouse of the offender; cause another, not the spouse of the offender, to have sexual contact with the offender; or cause two or more other persons to have sexual contact when any of the following applies: (1) The offender knows that the sexual contact is offensive to the other person, or one of the other persons, or is reckless in that regard; (2) The offender knows</li> </ul>

<b>Crime Type (Ohio Revised Code)</b>	<b>Definitions</b>
	<p>that the other person's, or one of the other person's, ability to appraise the nature of or control the offender's or touching person's conduct is substantially impaired; (3) The offender knows that the other person, or one of the other persons, submits because of being unaware of the sexual contact; (4) The other person, or one of the other persons, is thirteen years of age or older but less than sixteen years of age, whether or not the offender knows the age of such person, and the offender is at least eighteen years of age and four or more years older than such other person; (5) The offender is a mental health professional, the other person or one of the other persons is a mental health client or patient of the offender, and the offender induces the other person who is the client or patient to submit by falsely representing to the other person who is the client or patient that the sexual contact is necessary for mental health treatment purposes.</p>
Consent (as it relates to sexual activity)	The institution has determined, based on good-faith research, that Ohio law does not define the term consent (as it relates to sexual activity).

College Definition of Consent

The College uses the following definition of consent for the purpose of determining whether a violation of its Discrimination, Harassment, and Sexual Misconduct Policy occurred:

- Lack of consent is a critical factor in determining whether sexual violence has occurred. Consent is informed, freely given, and mutually understood. Consent requires an affirmative act or statement by each participant. Consent is not passive.
- If coercion, intimidation, threats, and/or physical force are used, there is no consent; a person's lack of verbal resistance or submission resulting from the use or threat of force does not constitute consent.
- If a person is mentally or physically incapacitated or impaired by alcohol or drugs such that the person cannot understand the fact, nature, or extent of the sexual situation, there is no consent.
- Warning signs of when a person may be incapacitated due to drug and/or alcohol use include: slurred speech, falling down, passing out, and vomiting.
- If a person is asleep or unconscious, there is no consent.
- A person who is under age in the applicable jurisdiction cannot provide consent to sexual activity.
- Consent to one form of sexual activity does not imply consent to other forms of sexual activity.
- Consent to past sexual activity does not imply consent to future sexual activity.
- Dressing in a certain manner does not constitute consent.
- Consent to sexual activity with one person does not constitute consent to engage in sexual activity with another.

- Consent can be withdrawn. A person who initially consents to sexual activity is deemed not to have consented to any sexual activity that occurs after he or she withdraws consent.
- Being in a romantic relationship with someone does not imply consent to any form of sexual activity.
- Effective consent may not exist when there is a disparity in power between the parties (e.g., faculty/student, supervisor/employee).

Coercion: when force or intimidation is used to make someone do something they do not want to do. This includes physical, emotional, psychological, social, or other threat. This also applies when a person is incapacitated.

Incapacitation: the state of being impaired or in a physical or mental state where the person lacks the ability to knowingly and deliberately make a choice including if asleep or unconscious. A person who is asleep, unconscious, or involuntarily restrained is incapacitated and cannot give effective consent.

Indicators of incapacitation include, but are not limited to: outrageous/unusual behavior; inability or diminished ability to accurately discern one's environment (who, what, where, when and/or how); slurred speech; vomiting; severe intoxication; loss of voluntary motor skills; loss of involuntary motor skills; disjointed speech patterns (unable to follow a conversation or verbalize complete thoughts); and/or sleepiness that demonstrates an inability to control one's ability to stay awake. Because incapacitation may be difficult to discern, the person seeking the sexual behavior is strongly encouraged to err on the side of caution; i.e., when in doubt, assume the other person is incapacitated and therefore unable to give effective consent (John Carroll University Sexual Harassment and Interpersonal Violence Policy).

### Risk Reduction

- Travel with another person or in groups that you trust. Go with a friend, group or use the Safety and Security department escort service.
- Seek information from any of the resources listed below to increase your awareness of safe actions.
- Don't prop open exterior doors. You could be letting in an intruder. The doors are locked for your safety.
- Know the location of phones, staff offices or other safe locations.
- Report suspicious person or activity to Safety and Security.
- Be alert and aware of people around you.
- Use public walkways. Avoid shortcuts, as well as dark or secluded places.
- Always lock your car and take your keys with you.
- Inquire into the purpose of people wandering the building without a student, employee or visitor badge. Your attention will be appreciated if the person is legitimate and will discourage others if this is not the case.
- If you are a victim, call Safety and Security immediately. They can assist you and advise you of your legal rights.
- Notify the Associate Dean, Compliance of your concerns.

If you find yourself in an uncomfortable sexual situation, these suggestions may help you reduce your risk:

- Make your limits known before going too far.
- You can withdraw consent to sexual activity at any time. Do not be afraid to tell a sexual aggressor “NO” clearly and loudly.
- Try to remove yourself from the physical presence of a sexual aggressor. Be direct as possible about wanting to leave the environment.
- Grab someone nearby and ask them for help.
- Be responsible about your alcohol and/or drug use. Alcohol and drugs can lower your sexual inhibitions and may make you vulnerable to someone who views an intoxicated/high person as a sexual opportunity.
- Attend large parties with friends you trust. Watch out for your friends and ask that they watch out for you.
- Be aware of someone trying to slip you an incapacitating “rape drug” like Rohypnol or GHB.

If you find yourself in the position of being the initiator of sexual behavior, these suggestions may help you to reduce your risk of being accused of sexual assault or another sexual crime:

- Remember that you owe sexual respect to the other person.
- Don’t make assumptions about the other person’s consent or about how far they are willing to go.
- Remember that consent to one form of sexual activity does not necessarily imply consent to another form of sexual behavior.
- If your partner expresses a withdrawal of consent, stop immediately.
- Clearly communicate your sexual intentions so that the other person has a chance to clearly tell you their intentions.
- Consider “mixed messages” a clear sign that the other person is uncomfortable with the situation and may not be ready to progress sexually.
- Don’t take advantage of someone who is really drunk or on drugs, even if they knowingly and intentionally put themselves in that state. Further, don’t be afraid to step in if you see someone else trying to take advantage of a nearly incapacitated person.
- Be aware of the signs of incapacitation, such as slurred speech, bloodshot eyes, vomiting, unusual behavior, passing out, staggering, etc.

It is also important to be aware of the warning signs of an abusive person. Some examples include:

- Extreme jealousy or insecurity
- Consistent verbal put-downs
- Isolating you from family or friends
- Making false accusations
- Mood swings

- Physically hurting you in any way
- Possessiveness
- Pressuring or forcing you to have sex
- Telling you what to do
- Checking your phone or email without permission

### Bystander Intervention

Bystander intervention is a social phenomenon where individuals offer help to a victim. A caring environment increases bystander intervention. Caring is one of the four core values of The Christ College. The College believes that educating the campus community about how to offer help, resources available, and examining difficult topics and beliefs about crimes, victim, and ethical responses will improve bystander response, foster healthy relationships, and promote healthy behavior and safe social norms. Individuals are encouraged to:

- Intervene when it is safe to do so. If you see someone who looks like they are in trouble, ask if they need help.
- Watch out for friends and others – be aware of signs of abuse behaviors. Abuse is about power and control. Relationships exist on a broad continuum and it can be difficult to recognize when abuse becomes violence.
- If suspicious behavior is noted, call 911 if needed
- Divert those at risk away from harm. Confront people who try to seclude or take advantage of those who are incapacitated.
- Call attention to concerning behaviors – discuss your concerns with the person at risk and others that might be able to intervene.
- Believe someone who tells you that they have experienced sexual assault, abuse or stalking.
- Refer people to on or off campus support and resources listed in the Annual Security Report.

### Other Information Covered by the PPAP

The PPAP also provides information on possible sanctions and protective measures that may be imposed following a determination that an offense of dating violence, domestic violence, sexual assault, or stalking has occurred, an explanation of the disciplinary procedures that will be followed when one of these offenses is alleged, the rights of the parties in such a proceeding, available resources, and other pertinent information. Much of this information is set forth in the upcoming sections of this security report.

### **Ongoing Prevention and Awareness Campaign:**

The College also conducts an Ongoing Prevention and Awareness Campaign (OPAC) aimed at all students and employees. This campaign covers the same material as provided in the PPAP, but is intended to increase the understanding of students and employees on these topics and to improve their skills for addressing the offenses of dating violence, domestic violence, sexual assault and stalking.

### **PPAP and OPAC Programming Methods:**

- Annual TCCNHS Safety and Wellness Training: This program has two components and is completed as part of enrollment steps when entering the College and annually thereafter as part of the OPAC. Part one covers general compliance issues and part two focuses on sexual misconduct introduction, sexual violence and consent, sexual violence in relationships, reporting sexual violence and the complaint resolution process. The second component focuses on sexual misconduct introduction, sexual violence and consent, sexual violence in relationships, reporting sexual violence and the complaint resolution process.
- Orientation Safety and Q&A Table: This table is available at orientation events each semester to provide information about safety initiatives at the College and answer questions related to safety, accessibility, programming, etc. Information on Title IX, VAWA, safety recommendations, and bystander intervention is provided.
- It's On Us TCCNHS: Aligned with the national and local program, the College program runs throughout the year with multiple activities and information available. *It's On Us* provides tools for awareness to stop sexual assault. Some of the components of the program that are used in part or whole at orientation include: taking the *It's On Us* pledge on itsonus.org which "is a personal commitment to help keep women and men safe from sexual assault. It is a promise not to be a bystander to the problem, but to be a part of the solution"; having photo taken inside the "I took the pledge" frame with subsequent posting on social media to show support; reflective posters where the college community can write their thoughts about associated topics such as consent and love; quizzes on domestic violence, sexual assault, and dating violence that allows the reader to assess their relationships. These documents can be taken and shared with others. Information on *Consent*, *How to Respond to a Survivor*, *IMPACT resources*, *What do Title IX, VAWA, and The Clery Act have to do with me?*, and *Bystander Intervention Tips* are also available. Public Service Announcements play on the TV during this program. Bystander tips are placed on candy and often other food is available as well as a resource person for questions and answers.
- The College participates in the Ohio Department of Higher Education's Changing Campus Culture program and provided incentives for students to complete the campus climate survey based on sexual misconduct. The purpose of this and introduction of the next year's survey is introduced at orientation. Follow-up education provided.
- Informational pamphlets are posted on each floor of the College in student-active areas such as by the Computer and Skills labs, Advisor's office, Compliance Board, and in the student lounge. Pamphlets include information on *Domestic Violence*, *Drug Abuse and Effects*, and *Alcohol Use and Your Health*. A poster presentation and changing digital signage are presented throughout the year on bystander intervention, warning signs of abuse, and safety tips on preventing potential attacks. Help cards from RAINN are available at student study and meeting locations throughout the building.
- R-E-S-P-E-C-T: This program focuses on sexual orientation and gender identity with a focus on participants experiencing the issues with a "coming out" experience of those in the LGBTQ community. Information is discussed regarding sociological, health and wellness issues for this group and how to support and respect LGBTQ community members.

**Procedures to Follow if You are a Victim of Dating Violence, Domestic Violence, Sexual Assault, or Stalking:**

If you are a victim of dating violence, domestic violence, sexual assault, or stalking, go to a safe place and call 911 or the Campus Security Department at 513-585-2222. You may also contact the College's Title IX Coordinator at 513-585-2055 or [Maureen.Schwab@thechristcollege.edu](mailto:Maureen.Schwab@thechristcollege.edu). Any Campus Security Authority or college employee may be contacted. For confidential reporting, the following resources are recommended:

- Students: IMPACT Student Life Assistance, 24/7/365 at (866) 780-0855.
- Employees: Employee Assistance Program (LifeMatters) 24/7/365 at 1-800-634-6433.
- All: Counselors at Women Helping Women (WHW) are off-site 24/7 confidential sources and WHW is available at 513-381-5610.

Victims will be notified in writing of the procedures to follow, including:

1. To whom and how the alleged offense should be reported (contact the Title IX Coordinator or refer to the other resources listed in this report).
2. The importance of preserving evidence that may be necessary to prove the offense in a criminal proceeding or disciplinary action or to obtain a protective order.
3. The victim's options regarding notification to law enforcement, which are: (a) the option to notify either on-campus or local police; (b) the option to be assisted by campus security authorities in notifying law enforcement if the victim so chooses (the institution is obligated to comply with such a request if it is made); and (c) the option to decline to notify such authorities.
4. Where applicable, the rights of victims and the institution's responsibilities regarding orders of protection, no-contact orders, restraining orders, or similar lawful orders issued by a criminal, civil, or tribal court.

#### Preservation of Evidence & Forensic Examinations

Victims of physical assault are advised to not remove clothing items worn during or following an assault, as they frequently contain valuable fiber, hair, and fluid evidence. Don't bathe or wash, or otherwise clean the environment in which the assault occurred. You can obtain a forensic examination at The Christ Hospital Health Network, 2139 Auburn Avenue, Cincinnati, OH, 45219, (513) 585-2000.

Completing a forensic examination does not require you to file a police report, but having a forensic examination will help preserve evidence in case you decide at a later date to file a police report.

Victims are also advised to retain evidence in electronic formats (e.g., text messages, emails, photos, social media posts, screenshots, etc.). Such evidence is valuable in all situations, and it may be the only type of evidence available in instances of stalking.

#### Security/Law Enforcement & How to Make a Police Report

- The Christ Hospital Safety and Security Department 513-585-2222
- Cincinnati Police 310 Ezzard Charles Dr. Cincinnati, OH 45214 513-765-1212
- To make a police report, a victim should contact the local police agency listed above either by phone or in-person. The victim should provide as much information as possible, including name, address, and when and what occurred, to the best of the victim's ability.

#### Information about Legal Protection Orders

- In Ohio, there are different kinds of protection orders available to victims, including Domestic Violence Civil Protection Orders (DVCPO), Civil Stalking Protection Orders (CSPO), and Sexually Oriented Offense Protection Orders (SOOPO). Courts can issue ex parte (temporary) orders and orders for longer lengths of time. Ex parte orders are typically put in place until a hearing before a judge occurs. A victim should be prepared to present documentation and/or other forms of evidence when filing for an order of protection. When a protection order is granted, they are enforceable statewide. If you have obtained an order and need it to be enforced in this area you should contact CPD.
- A DVCPO should be filed for in a Domestic Relations Court. The address for the Hamilton County Court of Domestic Relations is: 800 Broadway, Cincinnati, OH 45202. The phone number is 513-946-9000. More information is available here: <http://www.hamilton-co.org/domestic/Domestic%20Violence/Domestic.html>.
- A CSPO or SOOPO should be filed for in a Common Pleas Court. The address for the Hamilton County Common Pleas Court is: 1000 Main Street, Cincinnati, OH 45202. The phone number is 513-946-5800. More information is available here: <http://hamiltoncountycourts.org/index.php/common-pleas/>.
- Any student or employee who has a restraining order, order of protection, no contact order or any other such order issued by a court against another individual (whether or not that individual is also a student or employee of the institution) is highly encouraged to notify the Safety and Security Department and/or the Title IX Coordinator of the threat and to provide a copy of the restraining order so that it is kept on file with the Safety and Security Department and can be enforced on campus, if necessary.
- "No Trespass" Warnings: If information is available leading to a reasonable conclusion that an individual is likely to cause harm to any member of the campus community, the College may issue a No Trespass Warning. A person found to be in violation of a No Trespass Warning may be arrested and criminally charged.

### **Available Victim Services:**

Victims will be provided written notification about existing counseling, health, mental health, victim advocacy, legal assistance, visa and immigration assistance, student financial aid, and other services available to them, both within the College and in the surrounding community. Those services include:

- Students in need of personal counseling services for non-academic matters should contact IMPACT Student Assistance Program. This is a resource to help students manage emotional and academic stress and the demands with balancing school, work, daily living, family, and relationship concerns. All IMPACT counselors are qualified masters/doctoral level professionals. These services are confidential, complimentary, professional support and guidance. Access to the program is available 24/7 at (866) 780-0855. Up to three face-to-face coaching/counseling sessions are available per issue and includes daily living resource and referral assistance. Eligibility includes household members, dependents in/away from home and parents/parent-in-laws. Legal, financial, and identity theft recovery assistance is included.
- Employees may contact the Employee Assistance Program (LifeMatters) at 1-800-634-6433. This plan is free for employees and their eligible dependents. It covers 24/7 counseling, financial and legal consultations, and online and assisted searches for child and elder care resources and

more. For more information, check out **LifeMatters** online at this link:  
<https://members2.mylifematters.com/portal/landing>.

- Counselors at Women Helping Women (WHW) are off-site 24/7 confidential sources and WHW is available at 513-381-5610.
- Students and employees may also contact the Department of Pastoral Services of The Christ Hospital. The chaplains in the department are ministers who are qualified through their training and experience to offer spiritual care to all people in The Christ Hospital. Their sensitivity to individual beliefs and knowledge of different religious practices enable these chaplains to meet people at the point of their need. Offices of the Department of Pastoral Services are located on the first floor of the Hospital, near the lobby, and are open weekdays from 8:30 AM – 5:00 PM. A chaplain is on call 24 hours a day, and a Hospital associate can aid you in reaching a chaplain at any time by calling (513) 585-2000.
- Students and employees are strongly encouraged to reach out to a College Administrator, the Director of Financial Aid, Registrar, or their advisor. Each of these individuals will be able to listen to the student’s concerns and direct them to the appropriate area for support.
- Sometimes victims of serious crimes feel the need to take a leave of absence from school. If this is being considered, be aware that financial aid may be affected. If you have questions about financial aid implications in such circumstances, contact the Director of Financial Aid at Timothy.Ring@thechristcollege.edu or 513-585-2402. The Title IX Coordinator can help facilitate this conversation as well.
- Loveisrespect.org, 1-866-331-9474, or text “loveis” to 22522, or text HELP to 22522 for support.
- Women Helping Women, <http://www.womenhelpingwomen.org/>, 513-381-5610
- Women’s Crisis Center, <https://www.wccy.org/>, Covington, 859-491-3335, Florence 859-525-2600
- Indiana Coalition Against Domestic Violence, <http://www.icadvinc.org/>, 800-332-7385
- Ohio Domestic Violence Network, <http://www.odvn.org/>, 800-934-9840
- YWCA Domestic Violence Hotline, [http://www.ywcacincinnati.org/site/c.biINIZNKKjK0F/b.9357823/k.5236/Domestic\\_Violence\\_Shelters\\_\\_Transitional\\_Living\\_Program.htm](http://www.ywcacincinnati.org/site/c.biINIZNKKjK0F/b.9357823/k.5236/Domestic_Violence_Shelters__Transitional_Living_Program.htm), 513-872-9259
- Ohio Victims of Crime, <http://victimsofcrime.org/help-for-crime-victims>, 877-584-2846
- Talbert House Victims Service Center, <http://www.talberthouse.org/>, 513-241-4484
- National Domestic Violence Hotline, <http://www.thehotline.org/>, 1-800-799-7233
- National Sexual Assault Hotline, <https://www.rainn.org/>, 1-800-656-4673
- Sexual Assault Exam – you can go to any UC Hospital Emergency Department or St. Elizabeth Hospital Emergency Department
- Greater Cincinnati Behavioral Health Services, <https://www.gcbhs.com/>
- Central Clinic: Expert Mental Health Solutions, [http://www.centralclinic.org/?page\\_id=140](http://www.centralclinic.org/?page_id=140), 513-558-8888

- Ohio Legal Services, [http://www.ohiolegalservices.org/public/legal\\_problem](http://www.ohiolegalservices.org/public/legal_problem), 1-866-529-6446 (1.800.LAW.OHIO)
- Legal Aid Society of Greater Cincinnati, <http://www.lascinti.org/>, 513-241-9400
- Immigration Advocates Network:  
<http://www.immigrationadvocates.org/nonprofit/legaldirectory/search?state=OH>
- U.S. Citizenship and Immigration Services: <http://www.uscis.gov/about-us/find-uscis-office/field-offices/ohio>, 1-800-375-5283

### **Accommodations and Protective Measures:**

The College will provide written notification to victims about options for, and available assistance in, changing academic, living, transportation, and working situations or protective measures. If victims request these accommodations or protective measures and they are reasonably available the College is obligated to provide them, regardless of whether the victim chooses to report the crime to campus security or local law enforcement.

Requests for accommodations or protective measures should be made to the Title IX Coordinator at [Maureen.Schwab@thechristcollege.edu](mailto:Maureen.Schwab@thechristcollege.edu) or 513-585-2055. The Title IX Coordinator is responsible for deciding what, if any, accommodations or protective measures will be implemented.

When determining the reasonableness of such a request, the College may consider, among other factors, the following:

- The specific need expressed by the complainant.
- The age of the students involved.
- The severity or pervasiveness of the allegations
- Any continuing effects on the complainant
- Whether the complainant and alleged perpetrator share the same class or job location.
- Whether other judicial measures have been taken to protect the complainant (e.g., civil protection orders).

The College will maintain as confidential any accommodations or protective measures provided a victim to the extent that maintaining confidentiality would not impair the College's ability to provide them. However, there may be times when certain information must be disclosed to a third party in order to implement the accommodation or protective measure. Such decisions will be made by the College in light of the surrounding circumstances, and disclosures of this nature will be limited so that only the information necessary to implement the accommodation or protective measure is provided. In the event it is necessary to disclose information about a victim in order to provide an accommodation or protective order, the College will inform the victim of that necessity prior to the disclosure, including which information will be shared, with whom it will be shared and why.

### **Procedures for Disciplinary Action:**

Allegations of domestic violence, dating violence, sexual assault or stalking will be processed through the institution's Discrimination, Harassment, and Sexual Misconduct Policy and the related complaint resolution procedures. The procedures are utilized whenever or wherever a complaint is made, regardless of the status of the complainant and the respondent.

The complaint resolution procedures are invoked once a report is made to one of the following individuals:

**Title IX Coordinator**

Maureen Schwab  
Associate Dean of Compliance/Title IX Coordinator  
513-585-2055  
Office 306 Medical Office Building  
Maureen.Schwab@thechristcollege.edu

**Deputy Title IX Coordinator**

Dr. Meghan Hollowell  
Dean of College Support Services/Deputy Title IX Coordinator  
513-585-4841  
Office 121, TCCNHS  
Meghan.Hollowell@thechristcollege.edu

The complaint may be made in-person or by phone.

Once a complaint is made, the Title IX Coordinator or designee (“Investigating Officer”) will commence the investigatory process as soon as practicable, but not later than five (5) business days after the complaint is made. The Investigating Officer will analyze the complaint and notify the respondent that a complaint has been filed. If the complaint involves employees, the Investigating Officer will consult with Human Resources during the investigation. Informal resolution may be considered in certain circumstances if agreeable to both parties, but mediation will never be used in cases of sexual assault.

During a formal investigation, the complainant and respondent will each have an equal opportunity to describe the situation and present witnesses and other supporting evidence. The Investigating Officer will review the statements and evidence presented and may, depending on the circumstances, interview others with relevant knowledge, review documentary materials, and take any other appropriate action to gather and consider information relevant to the complaint. Upon completion of the investigation, the Investigating Officer will prepare an investigation report outlining the scope of the investigation (including witnesses interviewed and evidence considered), identify findings of fact, and state whether any allegations in the complaint were found to be substantiated by a preponderance of the evidence.

- If an employee respondent is found in violation of the Discrimination, Harassment, and Sexual Misconduct Policy, sanctions will be determined by the appropriate administrator in collaboration with the Human Resources Department. Such decisions are guided by the Standards of Performance and Conduct.
- If a student respondent is found in violation of the Discrimination, Harassment, and Sexual Misconduct Policy, sanctions will be determined by the Chief Academic Officer.
- If a third-party respondent is found in violation of the Discrimination, Harassment, and Sexual Misconduct policy, sanctions will be determined by the Title IX Coordinator, in consultation with other College officials as necessary.

The parties will be notified of the determination and sanctions/remedial measures imposed, if any, in writing within two (2) business days of the completion of the investigation report and decision regarding sanctions. The institution strives to complete investigations of this nature within thirty (30) calendar days.

If the complaint involves all non-student parties, the process ends at this point. If the complainant and/or respondent is a student, an appeal may be filed by either party to the Dean of Operations/Presidential Liaison (“Appellate Official”) within five (5) business days of receipt of notification of the resolution of the complaint. The Appellate Official will resolve the appeal within ten (10) business days of receiving it, and may take any and all actions that he/she determines to be in the interest of a fair and just decision.

### **Rights of the Parties in an Institutional Proceeding:**

During the course of the process described in the previous section, both the accuser and the individual accused of the offense are entitled to:

1. A prompt, fair and impartial process from the initial investigation to the final result.
  - A prompt, fair and impartial process is one that is:
    - Completed within reasonably prompt timeframes designated by the institution’s policy, including a process that allows for the extension of timeframes for good cause, with written notice to the accuser and the accused of the delay and the reason for the delay.
    - Conducted in a manner that:
      - Is consistent with the institution’s policies and transparent to the accuser and the accused.
      - Includes timely notice of meetings at which the accuser or accused, or both, may be present; and
      - Provides timely access to the accuser, the accused and appropriate officials to any information that will be used during the informal and formal disciplinary meetings and hearings.
    - Conducted by officials who do not have a conflict of interest or bias for or against the accuser or the accused.
2. Proceedings conducted by officials who, at a minimum, receive annual training on the issues related to dating violence, domestic violence, sexual assault and stalking and on how to conduct an investigation and hearing process that protects the safety of victims and promotes accountability.
  - Training for College officials included, but was not limited to, the following:
    - Intimate Partner Violence Prevention & Response Summit
    - Discussion Panel: The History & Future of Sexual Harassment Prevention
    - SANE (Sexual Assault Nurse Examiner) CARE
    - The Current and Future Landscape of Compliance in Higher Education
    - Are Your Clery Ducks in a Row?
    - Southwest Regional Prevention Strategy Workshop (Changing Campus Culture)
    - Title IX Compliance Update
    - Symposium on the Role of the Campus Advocate

- TCCNHS Employee Sexual Misconduct online training
  - TCCNHS CSA online training
  - The ABCs of Higher Education Compliance
  - Title IX and Sexual Misconduct on Campus: Training Faculty & Staff on What, When & How to Report
3. The same opportunities to have others present during any institutional disciplinary proceeding, including the opportunity to be accompanied to any related meeting or proceeding by the advisor of their choice. The institution may not limit the choice of advisor, but may establish limits regarding the extent to which that advisor may participate in the proceeding, as long as those limits apply equally to both parties.
  4. Have the outcome determined using the preponderance of the evidence standard.
  5. Simultaneous, written notification of the results of the proceeding, any procedures for either party to appeal the result, any change to the result, and when the result becomes final. For this purpose, “result” means “any initial, interim and final decision by an official or entity authorized to resolve disciplinary matters” and must include the rationale for reaching the result and any sanctions imposed.

**Possible Sanctions or Protective Measures that the College May Impose for Dating Violence, Domestic Violence, Sexual Assault or Stalking Offenses:**

Following a final determination in the institution’s disciplinary proceeding that domestic violence, dating violence, sexual assault, or stalking has been committed, the institution may impose a sanction depending on the mitigating and aggravating circumstances involved. The possible sanctions include:

- Alternative class placement: Party may be removed from a class or clinical and placed in an alternative class/clinical. Registration process may be adapted for specialized registration through the Registrar’s office.
- Alternative workplace arrangements: Party may have alternative workplace arrangements made.
- Placing limitation on contact between parties: prohibition of electronic, face-to-face (F2F), or other method of contact by parties or parties associates. An exception may be general notifications sent to the College’s students/employees as a whole in fulfillment of a specific role (i.e. minutes from a meeting by the secretary of the committee).
- Separation of the parties: physical separation involving parking, classes, and campus environment.
- Written reprimand: Documentation in a party’s employment or student file which may affect recommendations, consideration for promotion or participation in other activities.
- Training: Party may be required to attend and/or provide training on subject to campus community in written, oral, electronic or F2F presentation.
- Counseling: Party may be required to attend and participate in counseling. Failure to do so may result in further sanction up to or including expulsion or termination.
- Suspension: a student could be suspended for various lengths of time, up to three full semesters. During a suspension, the student may not attend classes or participate in any other

College activities. Various conditions for reinstatement could also be required, such as a meeting with an administrator or completion of a training session.

- Termination (employee) or Expulsion (student): The employee will be dismissed from their employment. The student will be dismissed from the College.

The College can make available to the victim a range of protective orders. They can include such things as: forbidding the accused and from communicating with the victim, other institutional no-contact orders, security escorts, modifications to academic requirements or class schedules, changes in class environment or working situations, etc.

### **Publicly Available Recordkeeping:**

The College will complete any publicly available recordkeeping, including Clery Act reporting and disclosures, without the inclusion of personally identifiable information about victims of dating violence, domestic violence, sexual assault, and stalking who make reports of such to the College to the extent permitted by law.

### **Victims to Receive Written Notification of Rights:**

When a student or employee reports to the College that he or she has been a victim of dating violence, domestic violence, sexual assault, or stalking, whether the offense occurred on or off campus, the College will provide the student or employee a written explanation of his or her rights and options as described in the paragraphs above.

### **Sex Offender Registration Program:**

The Campus Sex Crimes Prevention Act of 2000 requires institutions of higher education to advise members of the campus community where they can obtain information provided by the state concerning registered sex offenders. It also requires sex offenders to notify the state of each institution of higher education in the state at which they are employed or enrolled or carrying on a vocation. The state is then required to notify the College of any such information it receives. Anyone interested in determining whether such persons are on this campus may do so by contacting the Associate Dean of Compliance at 513-585-2055 or Maureen.Schwab@thechristcollege.edu. State registry of sex offender information may be accessed at the following link: [http://sheriffalerts.com/cap\\_main.php?office=55149](http://sheriffalerts.com/cap_main.php?office=55149)

## **Timely Warnings and Emergency Response**

### *Timely Warnings*

In the event of criminal activity occurring either on campus or off campus that in the judgment of the Director of TCH Safety and Security, Associate Dean of Compliance, Dean of Enrollment Management, Dean of Academics, Dean of College Support Services, Dean of Operations, and President constitutes a serious or continuing threat to members of the campus community, a campus-wide “timely warning” will be issued. Examples of such situations may include a sexual assault or a series of motor vehicle thefts in the area that merit a warning because they present a continuing threat to the campus community. Warnings will be communicated to students and employees via one or more of the methods discussed later in this section. Updates to the warnings will be provided as appropriate.

Anyone with information warranting a timely warning should immediately report the circumstances to:

- Secretary-Administrative, 513-585-2401

- Dean of Operations, 513-585-2068
- Dean of Academics, 513-585-1317
- Dean of College Support Services, 513-585-4841
- Associate Dean of Compliance, 513-585-2055
- TCH Safety and Security Department, 513-585-2222

The College has communicated with local law enforcement asking them to notify the College if it receives reports or information warranting a timely warning.

### Emergency Response

The College has an emergency management plan designed to ensure there is a timely and effective response in the event of a significant emergency or dangerous situation occurring on campus involving an immediate threat to the health or safety of members of the campus community. Such situations include, but are not limited to: fire, tornadoes, bomb threats, chemical spills, disease outbreaks, or armed intruders. TCCNHS has communicated with local police requesting their cooperation in informing the College about situations reported to them that may warrant an emergency response.

Students, staff and visitors are encouraged to notify the Christ Hospital Safety and Security Department at 585-2222 of any emergency or potentially dangerous situation.

The President, Dean of Operations, Dean of College Support Services, Dean of Academics, Dean of Enrollment Management, and Associate Dean of Compliance comprise the Threat Assessment and Response Team. The College's legal counsel serves as an adviser to the team. Other College personnel and outside resources with relevant areas of specialization and responsibility may be called upon to assist the team, including but not limited Associate Deans, Director of Safety and Security, law enforcement agencies, medical personnel, or other outside experts.

As appropriate to the circumstances of a particular situation, the Threat Assessment and Response Team may engage in activities that include, but are not limited to, the following:

- receiving reports and gathering and analyzing information regarding acts of violence, behavior of concern or statements and/or potential threats posed by individual(s);
- developing, implementing, and monitoring intervention strategies and management plans, with or without the involvement of other College teams or offices as appropriate, that are designed to respond appropriately to statements, behavior and/or circumstances that generate concern that an individual may pose a risk of harm to a member of the College community, including but not limited to, incidents of violence, threatening behavior or statements, unwanted pursuit, stalking, and harassment;
- coordinating with appropriate authorities, including law enforcement, medical personnel, and other outside agencies, as appropriate.

The team also analyzes available information related to potential emergencies to confirm whether such an emergency exists.

Once the emergency is confirmed and based on its nature, the Threat Assessment and Response Team will determine the appropriate segment or segments of the College community to be notified.

The Threat Assessment and Response Team in collaboration with other appropriate personnel, will determine who should be notified, and will, without delay, and taking into account the safety of the community, determine the content of the notification and initiate the notification system, unless issuing

a notification will, in the professional judgment of responsible authorities, compromise efforts to assist a victim or to contain, respond to or otherwise mitigate the emergency.

Depending on the segments of the campus the notification will target, the content of the notification may differ. When appropriate, the content of the notification will be determined in consultation with local authorities. Also as appropriate, the notification will give guidance as to whether its recipients should shelter in place or evacuate their location.

The Dean of College Support Services will direct the issuance of emergency notifications, which will be accomplished using one or more of methods discussed later in this section, depending on the nature of the threat and the segment of the campus community being threatened.

At the direction of Threat Assessment and Response Team, the College’s Safety and Security Department will contact local law enforcement of the emergency if they are not already aware of it. The Christ Hospital Public Relations Department will contact local media outlets in order that the larger community outside the campus will be aware of the emergency.

Methods for Issuing Timely Warnings and Emergency Notifications

The method(s) listed below may be utilized when the College issues a timely warning or emergency notification to the campus community.

<b>Method</b>	<b>Sign-Up Instructions</b>
Bulletins posted on building entrances/exits	None
Notice on digital media (College TV monitors)	None
Website	None
Text messaging	Members of the College community may choose to opt-in to the emergency messaging system for texts. All enrolled students and employees are invited to sign up for texting when first entered into the emergency messaging system upon acceptance/employment and frequently thereafter.
Phone call	Enrolled students and employees within the SonisWeb and emergency messaging system will receive a call at their preferred number. Many will receive calls at two numbers if numbers are in the system. At least one phone number is required.
Social Media; Facebook, Twitter	Members must sign on to these services to receive information in this format
Email Messaging through Christ College email system	All employees and enrolled students are assigned a college email

Blackboard (Bb)	None - all employees and students have access to Bb without logging into the site
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Testing & Documentation

The College tests its emergency response and evacuation procedures at least once a year. Also, at various times Safety and Security will meet to train and test and evaluate the College’s emergency response plan.

The Associate Dean of Compliance maintains a record of these tests and training exercises, including a description of them, the dates and times they were held and an indication of whether they were announced or unannounced. In connection with at least one such test, the College will distribute to its students and employees information to remind them of the College’s emergency response and evacuation procedures.

**Crime Statistics**

The statistical summary of crimes for this College over the past three calendar years follows:

Crime	On Campus			Non Campus			Public Property		
	2018	2017	2016	2018	2017	2016	2018	2017	2016
Murder/Non-Negligent Manslaughter	0	0	0	0	0	0	0	0	0
Manslaughter by Negligence	0	0	0	0	0	0	0	0	0
Rape	0	1	0	0	0	0	0	0	0
Fondling	0	1	0	0	0	0	0	0	0
Statutory Rape	0	0	0	0	0	0	0	0	0
Incest	0	0	0	0	0	0	0	0	0
Aggravated Assault	1	0	0	0	0	0	0	0	0
Burglary	0	0	0	0	0	0	0	0	0
Robbery	0	0	0	0	0	0	2	1	0
Motor Vehicle Theft	1	1	0	0	0	0	0	0	0
Arson	0	0	0	0	0	0	0	0	0
Arrest - Liquor Law Violation	0	0	0	0	0	0	0	0	0

Arrest - Drug Abuse Violation	0	0	0	0	0	0	0	0	0
Arrest - Weapon Violation	0	0	0	0	0	0	0	0	0
Disciplinary Referral - Liquor Law Violation	0	0	0	0	0	0	0	0	0
Disciplinary Referral - Drug Abuse Violation	0	0	0	0	0	0	0	0	0
Disciplinary Referral - Weapon Violation	0	0	0	0	0	0	0	0	0
Domestic Violence	0	0	0	0	0	0	0	0	0
Dating Violence	0	0	0	0	0	0	0	0	0
Stalking	0	0	0	0	0	0	0	0	0

\*The College does not have on-campus student housing facilities.

**Hate crimes:**

- 2018:** No hate crimes reported.
- 2017:** No hate crimes reported.
- 2016:** No hate crimes reported.

**Crimes unfounded by the College:**

- 2018:** 0 unfounded crimes.
- 2017:** 0 unfounded crimes.
- 2016:** 0 unfounded crimes.

**Statistics for unfounded crimes provided by law enforcement agencies:**

- 2018:** 0 unfounded crimes.
- 2017:** 0 unfounded crimes.
- 2016:** 0 unfounded crimes.

**Data from law enforcement agencies:**

- The data above reflects statistics provided from law enforcement agencies related to crimes that occurred on the College’s Clery Geography.