

2019 Annual Security and Fire Safety Report

*St. Louis College of Pharmacy's Clery Report for the calendar year 2018.
Published by the Office of Public Safety.*

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Introduction

The Annual Security and Fire Safety Report

Thank you for spending time reviewing our annual crime and fire safety report. St. Louis College of Pharmacy publishes this report in compliance with the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act (Clery Act) as updated by the Violence Against Women Reauthorization Act of 2013 (VAWA), Campus Sexual Violence Elimination Act (Campus SaVE Act) and the Higher Education Opportunity Act of 2008.

This report includes statistics for the previous three years concerning reported crimes that occurred on campus or property owned or controlled by the College, in certain off-campus buildings, and on public property within or immediately adjacent to and accessible from the campus. The report also includes policy statements on fire safety policies and statistics, emergency notification procedures, timely warnings, campus safety and security reporting, missing persons procedures, title IX, alcohol and drug abuse.

The Office of Public Safety works diligently with other departments and agencies to compile the necessary information for this report. The Offices of Student Affairs, Human Resources and the Department of Athletics, along with the St. Louis Metropolitan Police Department, Washington University in St. Louis Protective Services, Barnes-Jewish Hospital, and the Central West End Neighborhood Security Initiative are just a few of the “key players” that assist us in providing important information for this report.

I encourage all community members to take a few minutes and review this report. If you have any questions, please feel free to contact me at any time.

Sincerely,

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Part A

ANNUAL CLERY CRIME STATISTICS REPORT

Reporting Crimes and Emergencies

Community members, students, faculty, staff and guests are encouraged to report all crimes and public safety related incidents to the St. Louis College of Pharmacy Office of Public Safety in a timely manner. To report a crime or an emergency on campus, call Public Safety at ext. SAFE (7233) or, from off-campus, call 314.446.SAFE (314.446.7233).

In the event of an immediate or critical threat or danger, the appropriate emergency agency will be contacted by dialing 911. In addition to Public Safety, crimes may be reported to College's Campus Security Authorities (CSAs). The preferred CSAs for reporting crimes are:

- Eric Knoll, vice president, operations
- Heather French, vice president, student affairs
- Dan Bauer, director of human resources
- Scott Patterson, director of public safety
- Maryam Ouechani, residence life coordinator

A minimum of three to four public safety officers are on campus, 24 hours a day, 365 days a year. One officer is stationed in the security base on the first floor of the parking garage monitoring telephones, security cameras and activities in the garage. There are two armed public safety officers patrolling campus.

During an emergency, Public Safety will respond to your location. Response times may be affected by various factors, such as the number and location of available personnel or their involvement at the time a report is received. Response to an incident may also involve other personnel (i.e., Student Affairs staff in an incident involving a student, Counseling Center staff in the case of a sexual assault, etc.).

All public safety officers are trained in first aid and CPR, AED usage, along with meeting the requirements of the St. Louis Metropolitan License. Officers carry two-way radios to stay in constant communication with both College Office of Facilities Services personnel and Washington University in St. Louis Protective Service Officers.

Timely Warning

In the event that an on- or off-campus situation arises that, in the judgment of St. Louis College of Pharmacy management, constitutes an ongoing or continuing threat, a campus-wide "timely warning" will be issued. The warning will be issued through multiple communication channels, including the college's emergency alert system, to students, faculty and staff. Depending on the particular circumstances of the crime(s), especially in all situations that could pose an immediate threat to the community and individuals, the vice president operations, emergency management coordinator or Office of Public Safety may also post an email notice providing the campus community with more immediate notification.

Crime Alerts are usually distributed for Uniformed Crime Reporting Program (UCR)/National Incident Based Reporting System (NIBRS) classifications including arson, criminal homicide and robbery. Cases of aggravated assault and sex offenses are considered on a case-by-case basis, depending on the facts of the case and the information known by the Office of Public Safety. For example, if an assault occurs between two students who have a disagreement, there may be no on-going threat to other College community members and a timely warning notice would not be distributed. Timely warnings are distributed for the above crimes if they occur on College-designated property (on-campus, non-campus,

public property) and the incident constitutes an ongoing serious or continuing threat to community members. The vice president operations, emergency management coordinator and director of public safety work to collect this information by requesting all CSAs, local law enforcement agencies and neighboring institutions to report the above mentioned crimes in a timely fashion so a warning can be issued.

Examples of the type of information that may be contained in a public notification related to crime include:

- A succinct description of the incident and type of crime including location, date and time of occurrence
- A physical description of the suspect including gender, age, height, weight, hair color, etc., and race if available and accompanied by other descriptive characteristics
- A composite drawing of the suspect or photograph if available
- A description to an apparent connection to previous incidents if applicable
- Race of the victim, but only if there is an apparent bias motive
- Sex of the victim, if relevant
- Injuries sustained by the victim
- Notice to the campus community to use caution and provide safety tips
- Other relevant and pertinent information such as weapons involved

As an email is not immediately accessible via computer by all faculty, staff and students, anyone with information warranting a timely warning should report the circumstances to the security base station in person or by calling 314.446.SAFE (7233). The Office of Public Safety may also use additional methods to distribute the crime alert or safety bulletin, including using the College's emergency alert system, postings in north and south residence halls or using the College's phone system (see diagram pg.8 and Table 1 below for specific information about who develops message content and initiates distribution).

It should be noted that an institution is not required to provide a timely warning with respect to crimes reported to a pastoral or professional counselor.

Emergency (Immediate) Notification

The College's Emergency Operation Plan, Building Emergency Action Plans and Emergency Notification Procedures include information about management of emergency response and operations, Emergency Operations Center (EOC), and communication responsibilities. Individual College units and departments are responsible for developing contingency plans and continuity of operations plans for their staff and areas of responsibility. The College conducts announced and unannounced emergency response drills and exercises each year and tests of the emergency notification systems on campus. These tests are designed to assess and evaluate the emergency plans and capabilities of the institution. To aid with the documentation of drills, the College utilizes a formalized electronic inspection checklist using a computer program called iAuditor™.

The results from exercises are reported on the College After-Action Report template, which includes a list of corrective actions to be taken. In addition to drills and exercises, the College also use actual responses to events and After Action Reports to assess, evaluate, and improve responses and procedures. The Emergency Action Plans for all buildings on campus are updated on an annual basis and published at stlcop.edu/safety/emergency/plans.html. Each year, a campus-wide reminder is distributed to faculty, staff and students that includes the location of the plans.

Several public safety officers, supervisors and administrators are trained to respond to a serious incident should it arise and threaten the safety of the campus. The first responders to the scene are typically the College personnel from the Offices of Public Safety and Emergency Management and Environmental Health and Safety, as well as members of the St. Louis Metropolitan Police Department and St. Louis Fire

Department, when their assistance is necessary. These agencies typically respond and work together to manage the incident. Depending on the nature of the incident, other College departments and other local or federal agencies could also be involved in responding to the incident. The College has general evacuation guidelines, in the event that a segment of the campus needs to be evacuated. The plan would be affected by a myriad of factors, including the type of threat, the occupancy of the other buildings and areas of the campus at the time of the incident, etc. Therefore, specific information about a multi-building or area evacuation cannot be shared with the campus community in advance.

The College expects members of its community to follow the instructions of first responders on the scene, as this type of evacuation would be coordinated on-site. If an incident occurs and the buildings or areas around you become unstable, or if the air outdoors becomes dangerous due to toxic or irritating substances, it is usually safer to stay indoors to limit potential exposure risks. In these cases, College personnel may be instructed to “shelter-in-place.” To “shelter-in-place” means to make a shelter of the building in which you are located. With a few adjustments, this location can be made even safer and more comfortable until it is safe to go outside. This means if an incident occurs and the building you are in is not damaged, stay inside in an interior room until you are told it is safe to come out. If your building is damaged, take your personal belongings (purse, wallet, access cards, etc.) and follow the evacuation procedures for your building (close your door, proceed to the nearest exit and use the stairs instead of the elevators). Once you have evacuated, quickly seek shelter at the nearest College building. If first responders are already on the scene, follow their directions. Additional information about the emergency response and evacuation procedures and updates to the plans for the St. Louis College of Pharmacy is available on stlcop.edu/safety/emergency/plans.html.

College community members are encouraged to notify the Office of Public Safety of any situation or incident on campus that involves an emergency or dangerous situation that may involve an immediate threat to the health and safety of students and/or employees on campus. The Offices of Public Safety and Emergency Management have the responsibility of responding to and summoning the necessary resources, to mitigate, investigate and document any situation that may cause a significant emergency or dangerous situation. Per the letter of promulgation found in the College's Emergency Management Framework, the Office of Public Safety have a responsibility to respond to such incidents to determine if the situation does in fact pose a threat to the community. However, other offices such as Facilities, Student Affairs, etc. may be involved in the confirmation process, depending on the nature of the potential threat.

If a potential threat to the community is identified, the institution is required to notify the campus community or the appropriate segments of the community that may be affected by the situation. If the Office of Public Safety confirm there is an emergency or dangerous situation that poses an immediate threat to the health or safety of some or all members of the community, the College has several forms of communication that may be utilized to deliver a timely warning or emergency notification (see diagram pg.8). The vice president operations, emergency management coordinator, director of public safety, as well as other public safety personnel and members of the College administration, will collaborate to determine the content of the message. They will initiate some or all of the systems listed below to communicate the threat to the College community or to the appropriate segment of the community, if the threat is limited to a particular building or segment of the population.

STLCOP Alerts

Threat Level Communication Schematic



Table 1: Alert Administrators

#	System	Administrators
1	VOIP Phone System	Office of Public Safety designee* Vice President, Operations** Emergency Management Coordinator** Director of Public Safety (or designee)**
2	Building Public Address	Building Automated Notification Maintenance or Office of Public safety personnel**
3	STLCOP Alerts RAVE (text and email)	Emergency Management Coordinator* Director of Public Safety (or designee)** Vice President, Operations**
4	STLCOP Alerts Alertus (beacons and IP devices)	Emergency Management Coordinator* Director of Public Safety (or designee)** Vice President, Operations**
5	Campus Email	Vice President, Operations* Emergency Management Coordinator* Vice President of Marketing and Enrollment Services (or designee)** Director of Public Safety (or designee)**
6	Campus Safety Bulletins and Fliers	Director of Public Safety (or designee)** Emergency Management Coordinator Vice President, Operations** Office of Residence Life personnel**
7	Bullhorn	Director of Public Safety (or designee)** Emergency Management Coordinator**

**Indicates primary system administrator*

***Indicates secondary system administrator*

After the initial communication, the primary means of providing follow-up information to the community will be on the College's institutional website (<https://stlcop.edu/>). The College may also use any of the systems listed above to provide follow-up information, as deemed appropriate. During the emergency, the institutional website will display information regarding the situation, and it will be updated throughout the emergency. Due to limited characters available with text messaging, the emergency alert system would typically be used to provide limited safety information that is critical such as areas to avoid, shelter in place, all clear, etc. The larger community, including parents, neighbors and other interested persons can obtain information about an emergency on campus via the main webpage or the local or national media.

It should be noted that unlike the Timely Warning requirement, emergency notification is not restricted just to Clery reportable crimes. Incidents such as a serious gas leak, hazmat spill, etc., could warrant the use of this protocol. The vice president operations, emergency management coordinator, director of public safety and other College officials 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 judgment of the first responders (St. Louis Metropolitan Police, St. Louis City Fire Department, etc.), compromise the efforts to assist a victim or to contain, respond to, or otherwise mitigate the emergency.

Annual Notification and Testing

The College will annually test and publicize their emergency response and evacuation procedures. Throughout the year, College officials and critical personnel will meet and train on the College's response to a critical incident through a variety of discussions and exercises, including tabletop and functional exercises. These tests may be announced or unannounced depending on the type of exercise and the impact on day-to-day operations/availability. College community members are encouraged to review the emergency response plans and evacuation procedures for each area they frequent throughout their typical workday.

The emergency response plans and evacuation procedures can be found online at <http://stlcop.edu/safety/emergency/plans.html>.

Reporting Crimes on a Voluntary, Confidential Basis

The Office of Public Safety encourages anyone who is the victim or witness to any crime to promptly report the incident to Public Safety personnel and St. Louis Metropolitan Police. Because police reports are public records under state law, the Police Department cannot hold reports of crime in confidence. Confidential reports for purposes of inclusion in the annual disclosure of crime statistics can generally be made to a campus security authority such as Public Safety, faculty managers and other College officials.

Preparation of the Annual Disclosure of Crime Statistics

The St. Louis College of Pharmacy Office of Public Safety prepares an annual report to comply with the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act as updated by the Violence Against Women Reauthorization Act of 2013 (VAWA), Campus Sexual Violence Elimination Act (Campus SaVE Act). The report is reviewed by several College officials each year before it is published.

Campus crime, arrest and referral statistics include those reported to the Office of Public Safety and supporting law enforcement agencies within the St. Louis Metropolitan area. Each year the report is completed and the report is posted in the base station of the Office of Public Safety, and an email notification is made to all enrolled students, faculty and staff. In that email is a hyperlink that takes the individual directly to the most current Annual Security and Fire Report. A copy may also be requested during weekdays at the security base located in the Children's Place garage.

For questions to request a copy of the report, contact:

Scott Patterson, director of public safety
314.446.8382
scott.patterson@stlcop.edu

Access and Maintenance Considerations for Campus Facilities and Residence Hall

During business hours, the College (excluding certain residence hall, laboratory and classroom facilities) will be generally open to students, parents, employees, contractors, guests and invitees. During non-business hours, access is by keycard, if issued, or by admittance via public safety or other authorized College personnel. Some campus facilities may have individual hours, which may vary at different times of the year. An example of this is the library. In these cases, the facilities will be secured according to schedules developed by the department responsible for that facility. Emergencies, campus closings, and special events may necessitate changes or alterations to any posted schedules.

The College will make every reasonable effort to respect the privacy of students and give prior notice of entry into student rooms. The College reserves the right of entry without notice for such purposes as may be necessary to assure compliance with policies of the College and federal, state, and local laws; to verify occupancy; to maintain the premises; and to meet emergencies. Work orders are placed by members of the community to repair facilities issues in a system called issuetrak. Campus inspections by public safety and facilities employees are conducted on a regular basis. Key and card access management responsibility is a shared responsibility by the Office of Public Safety and Facilities. See [policy](#) for further.

Keycard Access

Access to the Academic Research Building (ARB) is by card reader after 5 p.m. and before 7:45 a.m., Monday through Friday. Floors 5-7 have restricted access.

Access to Jones Hall is by card reader after 5 p.m. and before 7:45 a.m., Monday through Friday.

Students have card access to Jones Hall and ARB for study purposes 24 hours a day.

Access to the South Residence Hall is by card access only. Access to the private areas of the South Residence Hall is limited to residents of the building and requires card access 24 hours a day.

Access to the Recreational and Student Center/North Residence Hall is by card reader after 5 p.m. and before 8 a.m., Monday through Friday. Access to the North Residence Hall is by card access only (Floors 5-7).

Access to the Duncan Avenue and Children's Place garages is by keycard to registered parkers and pedestrians during business hours. The garages are monitored 24 hours a day by the St. Louis College of Pharmacy Office of Public Safety, BJC HealthCare Security and Washington University in St. Louis Protective Services.

Lighting and Landscape

The College is committed to campus safety and security. Exterior lighting and landscape control is a critical part of that commitment. Members of the Offices of Facilities and Public Safety periodically conduct security surveys to ensure campus lighting is adequate and the landscape appropriately controlled. Public safety officers conduct routine checks of lighting on campus during regular assigned patrol duties. If they observe some lights are out or very dim they will initiate a service request for facilities to repair the problem. We encourage community members to report any deficiency in lighting to Facilities at 314.446.8385 or Public Safety at 314.446.SAFE (7233). Facilities personnel are also available to respond to calls for service regarding unsafe facility conditions. These conditions may include unsafe steps and handrails, unsafe walkways on campus, and unsecured equipment, etc. Public safety officers, routinely check the College's fire extinguishers, sprinkler valves, panic alarms, ADA doors, CCTV

systems, etc., and document their findings by completing a checklist and completing a work order for any problems they find while checking the equipment.

St. Louis College of Pharmacy Public Safety Authority

The College's public safety officers have the authority to ask people for identification, enforce College policies and regulations, issue parking tickets billed to financial accounts of students, faculty, and staff, to determine whether individuals have lawful business at St. Louis College of Pharmacy. A public safety officer may make a custodial arrest or prevent the escape of a person who has committed a criminal offense, and when the arrest or detention is immediately necessary to arrest the offender or prevent his or her escape from custody. Public safety officers do not possess arresting powers off campus as a commissioned Missouri police officer. However, failing to comply with a lawful request by an officer may subject one to arrest by the St. Louis Metropolitan Police Department. The Office of Public Safety maintains a highly professional working relationship with all local law enforcement. Public safety staff members are on duty 24 hours a day monitoring CCTV and communications and patrolling the Campus and are always available to provide support, assistance or information as required.

Although St. Louis College of Pharmacy Office of Public Safety does not have any written memorandum of understanding agreements with local and state law enforcement agencies for response to or investigation of crimes, they maintain a strong working relationship with the St. Louis Metro Police Department, Missouri Highway Patrol, and local federal authorities, as well as neighboring security forces from Washington University Protective Services, Barnes-Jewish Hospital and the Central West End Neighborhood Security Initiative.

Policies and Procedures Encouraging Accurate and Prompt Reporting

All crime victims and witnesses are strongly encouraged to immediately report crimes to the public safety office who will contact the appropriate police agency. Prompt reporting will assure timely warning notices, help protect the campus community, and assure timely disclosure of crime statistics. Public safety may issue trespass warnings to any individual deemed a threat to the campus community and to visitors who refuse to comply with the reasonable requests of College officials. These warnings may be verbal or written. Violations of the trespass warning may result in a formal complaint to the St. Louis Metropolitan Police Department and the arrest of the individual.

If assistance is required from the St. Louis Metropolitan Police Department or neighboring institutions, public safety will contact the appropriate unit to request assistance or information.

This publication contains information about on-campus and off-campus resources. That information is made available to provide the College community members with specific information about the resources that are available in the event that they become the victim of a crime. The information about "resources" is not provided to infer that those resources are "reporting entities" for the College.

Crimes should be reported to the Office of Public Safety to ensure inclusion in the annual crime statistics and to aid in providing timely warning notices to the community, when appropriate. For example, a crime that was reported only to the St. Louis Metropolitan Police Rape Crisis Center would not be included in the College crime statistics. Community members, students, faculty, staff, and guests are encouraged to report all crimes and public safety related incidents to the College's security in a timely manner. To report a crime or an emergency on campus, call the Office of Public Safety at ext. SAFE (7233) or, from outside the College call 314.446.SAFE (7233). All St. Louis College of Pharmacy incident reports generated by the Office of Public Safety are forwarded to the vice president, operations and director of the Office of Public Safety. The Office of Public Safety will investigate a report when it is deemed appropriate.

Additional information obtained via the investigation will also be forwarded to the vice president for student affairs or to the College's designated Title IX Coordinator/Deputy Coordinator for incidents that involve students. For further information refer to the [campus safety and security reporting policy](#).

Pastoral and Professional Counselors (Crime Reporting)

As a result of the negotiated rulemaking process which followed the signing into law, the 1998 amendments to 20 U.S.C. Section 1092 (f), clarification was given to those considered to be campus security authorities. Campus pastoral counselors and campus professional counselors, when acting as such, are not considered to be a campus security authority and are not required to report crimes for the inclusion into the annual disclosure of crime statistics. As a matter of policy, they are encouraged, if and when they deem appropriate, to inform persons being counseled of the procedures to report crimes on a voluntary basis for inclusion into the annual crime statistics.

The rulemaking committee defines counselors as:

- **Pastoral Counselor:** An employee of the institution, who is associated with a religious order or denomination, recognized by that religious order or denomination as someone who provides confidential counseling and who is functioning within the scope of that recognition as a pastoral counselor. St. Louis College of Pharmacy does not currently have any pastoral counselors.
- **Professional Counselor:** An employee of an institution whose official responsibilities include providing psychological counseling to members of the institution's community and who is functioning within the scope of his or her license or certification.

Security Awareness, Crime Prevention and Safety Programs

All members of the community are continually reminded they must be responsible for their own security and the security of others. This message is reinforced through security awareness programs offered by numerous departments, the annual disclosure form, and in the "timely warnings" distributed to the campus community.

Student Information at Orientation

During orientation for new and returning students prior to the fall semester students are informed about a variety of services offered by public safety. Crime prevention programs, safety and security awareness and sexual assault prevention programs are offered on a continual basis. Periodically during the academic year, public safety, in cooperation with other departments, such as the Office of Student Affairs, present awareness presentations and campaigns on emergency preparedness, sexual assault, stalking, bystander intervention, alcohol abuse, date rape drugs, theft prevention, etc.

Employee Information at Orientation

When a new employee is hired, the Office of Human Resources provides information on how to obtain a copy of the annual disclosure form. The vice president operations conducts a new hire orientation segment that covers information pertaining to campus security services, procedures, practices and crime prevention programs. All employees are encouraged to participate in new hire orientation and any other safety and security programming.

Employee Information Annual Review

On an annual basis, at the beginning of each academic year, an annual review of certain policies and procedures takes place for all faculty and staff. This review covers information about the Office of Public Safety, campus crime reporting and statistics, emergency notifications and evacuation and sheltering procedures.

Resident Hall Fire Prevention Information

All residence hall rooms and common areas have smoke detectors that are hardwired and when activated will send an alarm to a third party monitoring company who will dispatch the St. Louis Fire Department. The residence hall has a fire sprinkler system installed as well. The Office of Public Safety works in conjunction with facilities and residence life to conduct two fire drills (evacuations) from the residence hall during the academic year. The College requires complete evacuation of buildings during a fire alarm. Individuals who ignore fire alarms and required evacuations may face disciplinary action. Fire evacuation drills were administered for the Residence Halls during the 2018 calendar year.

Campus Health and Safety Escort Program

The Office of Public Safety is available 24 hours a day to provide safety and health escorts to and from any location on the College campus. Officers may escort students to and from the Saint Louis University Student Health Center, as well as any surrounding urgent care facility. In addition, officers will provide walking escorts to and from the Central West End/Washington University Medical Complex MetroLink Station. College personnel and students are advised to be patient when calling as officers may be busy handling other calls. Public Safety will also provide safety escorts off campus up to a three-mile radius from campus in a marked vehicle for faculty, staff or students from 6 p.m. to 1 a.m.

Campus Safety Tip of the Month

First of the month, the Office of Public Safety emails various safety tips of the month out to the campus community. Examples are fire safety/prevention, STLCOP Alerts, vehicle safety, and National Preparedness Month topics.

Emergency Blue Box and Panic Buttons

The College operates nine blue light buttons in the Children's Place Garage near each set of east and west stairwells. Pressing the button will send a notification to the public safety base station. The system is tested on a monthly basis by the Office of Public Safety. Virtual panic buttons are in all classrooms at the desktop teaching areas. These virtual panic buttons are also in dedicated offices, department suites and front desk areas on campus.

In-Person Training for Select Personnel

Departments and personnel of the College, such as athletic coaches and resident assistants, receive specialized, in- person training regarding Clery, Title IX and how to respond to incidents of crime or sexual assault, relationship violence and stalking. Student groups have requested such training. Members of the department are available to assist any individual or group in planning, presenting, and coordinating programs of interest or concern. To get more information or a list of these trainings, please contact the director of public safety at 314-446-8382.

Campus CERT

The College has members of the campus community that have been trained in federal/state recognized program called Community Emergency Response Team for all hazard events on campus.

Welcome Back BBQ and Resource Fair

Each year, the emergency management coordinator and the director of public safety talks with students, faculty and staff about the Clery Act, campus safety, security and emergency management services and procedures. There are also brochures and flyers available to all attendees that cover services, procedures, on- and off-campus crime prevention awareness and techniques.

RA and Desk Attendant Training

The emergency management coordinator and the director of public safety annually provide an overview of the services that are provided by both departments. The focus of the desk attendant training was on access control, building security, emergency evacuation procedures, Clery Act and reporting. As for the residence assistant training, a brief overview of how to write reports to identify Clery Act reportable incidents. Role-playing and situational briefings are conducted for these student workers.

Monitoring Off-Campus Criminal Activity

St. Louis College of Pharmacy operates no off-campus housing or off-campus student organization facilities that would require the College or local police agencies to monitor off-campus criminal activity. Any student who is in an off-campus rotation for their course of study will be instructed to get an overview of that site's emergency operations plan and to report to the College any crimes that have been committed against them during their rotation.

Possession, Use and Sale of Alcoholic Beverages

The use, sale, delivery, possession and consumption of alcoholic beverages in or on any property owned or controlled by the College are strictly prohibited except as specifically stated in College policy. The College enforces all city, state and federal laws pertaining to the illegal use of alcoholic beverages, particularly the laws that prohibit the sale to or possession of alcoholic beverages by person(s) under the age of 21. Any groups or persons violating the alcohol/substance policies or laws may be subject to arrest by the St. Louis Metropolitan Police Department and/or disciplinary sanctions by the College.

Possession, Use and Sale of Illegal Drugs

The possession, sale, manufacture, or distribution of any controlled substance is illegal under both state and federal laws and prohibited by College policies. Such laws are strictly enforced by the College. Violators are subject to arrest by the St. Louis Metropolitan Police Department and/or disciplinary sanctions by the College.

Alcohol and Drug Policies

St. Louis College of Pharmacy is committed to maintaining a safe, healthful, and efficient environment, which enhances the welfare of our faculty, staff and students. St. Louis College of Pharmacy believes that chemical dependency is a disease that can endanger the health and well-being of students, staff and faculty and can have a negative effect on the public that they serve. St. Louis College of Pharmacy advocates treatment and rehabilitation for affected students, staff and faculty in a manner that first protects the public, while allowing a reasonable opportunity for recovery and re-entry into the work place/classroom. St. Louis College of Pharmacy does not discriminate against individuals who are in recovery from chemical dependency in its academic programs or employment practices.

St. Louis College of Pharmacy is committed to promoting the health and safety of its campus community through a program of alcohol education and the implementation of relevant policies. The College enforces compliance with local and state alcoholic beverage laws on campus and at College-sponsored activities. The College affirms its adherence to the following principles:

- The misuse and/or abuse of alcoholic beverages and related behavior, such as disorderly conduct, illness due to excessive consumption of alcohol, and destruction of property, pose a danger to individual members of the College community and to the community at large.
- The promotion of alcoholic beverage consumption as the primary focus of on- and off-campus activities is inappropriate because it invites members of the College community to violate College regulations and Missouri law.
- Consumption of alcoholic beverages should only be by persons of legal age and by personal choice.
- Those who choose to consume alcoholic beverages should do so responsibly and in moderation.
- Consumption of alcoholic beverages should not be the focus of an event or the only means of refreshment at an event.
- The responsibility for proper consumption of alcoholic beverages and for compliance with laws of Missouri rests with each individual member of the College community.

The College does not condone violations of those laws proscribing possession, use, or sale of alcoholic beverages and possession, use, sale, manufacture, or distribution of illegal drugs. Members of the College community should know that law enforcement and administrative action, which may include eviction from the residence halls, revocation of other privileges, or suspension or expulsion from the College, may be taken in order to protect the interests of the College and the rights and safety of others. Please refer to the St. Louis College of Pharmacy Drug and Alcohol Abuse Prevention [Handbook](#) listed in this document for further information.

Resources for Alcohol and Drug Abuse

Faculty or Staff

- Employee Assistance Program (EAP) for employees 314.845.8302 or 800.832.8302

Students

- Campus Counseling Service for students 314.446.8338

Drug and Alcohol Abuse Prevention Programs

Communication and Distribution of Policy

The entire text of the St. Louis College of Pharmacy Drug and Alcohol Abuse Prevention Handbook as well as the College's penalties for possession or distribution of controlled substances by students on College premises or at institutionally sponsored activities off campus, are located in Appendix A of this document; information is also in the Student Code. In addition, St. Louis College of Pharmacy is in compliance with the federal Drug-Free Schools and Communities Act of 1989. Each year St. Louis College of Pharmacy renews its commitment to the letter and spirit of that law by notifying students and employees of its policies.

Alcohol Awareness Programming

Annually the Student Organization for Drug and Alcohol Awareness (SODAA) sponsors a week of awareness activities each spring semester during Alcohol Awareness Week. Other activities include camp seminars, “Tripping the Threshold” “jail and bail” and “mocktails” events to draw attention to having fun without alcohol. Most of the content is how to make good decisions, consent and drinking responsibly.

Policy against Sexual Harassment, Sexual Assault, Relationship Violence, and Stalking

St. Louis College of Pharmacy prohibits Sexual Harassment, Sexual Assault, Relationship Violence, and Stalking, as these terms are defined below, (herein collectively referred to as “Sexual Misconduct and Stalking”) both on and off campus. It also prohibits direct or indirect “Retaliation and Intimidation” (as the term is defined below) against any person filing a complaint under this [Policy](#) or taking part in an investigation under this Policy. St. Louis College of Pharmacy takes the safety and wellbeing of its students, faculty, and staff seriously and offers many forms of education and support to prevent Sexual Misconduct and Stalking and to support the college community in the event that Sexual Misconduct and Stalking does occur. This policy applies to all faculty, staff, students, and others (guests, contractors and visitors) (herein collectively referred to as “Covered Persons”).

Covered Persons who violate this policy are subject to the grievance and disciplinary procedures of the College and such civil and criminal laws as may apply. Violations of this policy can result in consequences up to and including suspension and expulsion as well as referral to appropriate law enforcement.

Purpose

St. Louis College of Pharmacy’s mission is to be a supportive and enriching environment for growth, advancement, and leadership and prepares our students, residents, faculty, staff, and alumni to positively impact patients and society. The College seeks to create an enriching climate that educates and a supportive environment where students are educated in awareness and prevention of Sexual Misconduct and Stalking as well as an environment that encourages individuals to report incidents of Sexual Misconduct and Stalking to the College. Reporting incidents involving Sexual Misconduct and Stalking is essential to ensuring that this policy is followed and enforced. Reporting provides the opportunity for effective intervention, support and remediation, and most importantly, to help prevent such incidents from occurring.

This policy and associated procedures are designed to achieve the following goals:

- Cultivate a climate of empowerment and education in which behavioral standards and prohibited conduct are understood by the entire campus community.
- Create an environment that facilitates the prompt reporting of sexual misconduct and stalking offenses through clear and easily understood processes.
- Provide prompt and compassionate support services for claimants (individuals bringing the complaint), respondents (individuals accused of violating this policy), and other parties involved in or affected by an incident.
- Ensure that the College is made aware of incidents that require criminal or other reporting and ensure that such reporting takes place in a prompt and effective manner.
- Provide clear reporting procedures and clear explanations of confidentiality and privacy issues. Provide effective investigation, evaluating and adjudication of reports of Sexual
- Misconduct and Stalking guided by principles of fairness and due process while maintaining the College’s obligation to the safety and security of its community.

- Comply with the requirements of the Violence Against Women Act, the Clery Act, Title IX, and other state and federal laws.

Definitions of Prohibited Conduct

- **Sexual Misconduct and Stalking:** The term “Sexual Misconduct and Stalking” for the purposes of this policy shall include, as the case may be, any or all of the following defined terms: Sexual Harassment, Sexual Assault, Relationship Violence and/or Stalking.
- **Sexual Harassment:** Sexual Harassment is any unwelcome conduct of a sexual nature. This can include unwelcome sexual advances, requests for sexual favors, and other verbal, nonverbal, or physical conduct of a sexual nature. Sexual harassment also encompasses nonsexual conduct, provided the behavior is unwelcome, is based on sex or sexual stereotyping, and has the effect of interfering with a student’s ability to participate in or benefit from a school program. Sexual harassment can occur between members of the same or opposite sex/gender. Harassment based on an individual’s sex, gender, or sexual orientation is sexual harassment.
- **Sexual Assault:** Sexual Assault includes non-consensual sexual contact, non-consensual intercourse and sexual exploitation.
 - **Nonconsensual Sexual Contact:** Non-Consensual sexual contact is defined as any intentional sexual touching, however slight, with any object, by a person upon another person that is without consent and/or by force. Examples include bodily contact with the breasts, groin, genitals, mouth or other bodily orifice of another individual, or other bodily contact in a sexual manner. This contact can be perpetrated by a member of the same or opposite sex.
 - **Non-Consensual Sexual Intercourse:** Non-Consensual Sexual Intercourse is any sexual penetration or oral copulation, however slight, by a person upon another person that is without consent and/or by force. Sexual penetration includes vaginal or anal penetration by a penis, tongue, finger or object, or oral copulation by mouth or genital contact or genital to mouth contact.
 - **Sexual Exploitation:** Sexual exploitation occurs when a person takes non-consensual or abusive sexual advantage of another for his/her own advantage or benefit, or to benefit or advantage anyone other than the one being exploited, and that behavior does not otherwise constitute one of other sexual misconduct offenses. Examples include, but are not limited to: Invasion of sexual privacy, prostitution, non- consensual video or audio taping of sexual activity, going beyond the boundaries of consent (such as allowing others to secretly watch you having consensual sex or distributing sexual photographs without the person’s consent), engaging in voyeurism, knowingly transmitting a sexually transmitted disease or HIV to another person, exposing one’s genitals in non-consensual circumstances, inducing another to expose their genitals, administering alcohol or drugs to another person without his or her knowledge or consent (“date rape” drugs).
- **Relationship Violence:** St. Louis College of Pharmacy uses the term “Relationship Violence” to mean domestic violence and dating violence.
- **Domestic Violence:** Domestic violence refers to an act of violence that is a misdemeanor or felony by a current or former: spouse, intimate partner, cohabitant, or similarly situated person; a person with whom a victim shares a child in common; or anyone else protected under domestic or family violence law.
- **Dating Violence:** Dating violence is defined as physical violence or the threat of physical violence by a person who has been in a romantic or intimate relationship with the victim. Whether a relationship exists will depend on the statement of the accusing party as well as the length,

type, and frequency of interaction. Dating violence includes, but is not limited to, sexual or physical abuse or the threat of abuse.

- **Stalking:** Stalking is engaging in a course of conduct directed at a specific person that would cause a reasonable person to: a) fear for his or her safety or the safety of others; or b) suffer substantial emotional distress. Stalking can be perpetrated physically or virtually through the internet or other electronic means.
- **Retaliation and Intimidation:** It is a violation of policy to retaliate against or intimidate in any way an individual seeking guidance, filing a complaint or taking part in the investigation of a complaint of Sexual Misconduct. An individual who retaliates against or intimidates another will be subject to the full range of corrective action, up to and including discharge or expulsion.

Reporting Complaints and Confidentiality

The College has initiated a complaint procedure designed to encourage any faculty, staff, student or visitor to report any instance of Sexual Misconduct and Stalking that violates these policies. A complainant does not have to decide whether to request criminal reporting, or pursue College conduct processes, to make a complaint.

The College encourages victims of Sexual Misconduct and Stalking to talk to somebody about what happened – so they can get the support they need, and so the College can respond appropriately. Different employees on campus have different abilities to maintain a complainant's confidentiality.

- Some are required to maintain near complete confidentiality; talking to them is sometimes called a "privileged communication." An example would be a campus psychologist or mental health counselors.
- All other employees are considered "Responsible employees" and are required to report all the details of an incident (including the identities of both the victim and alleged perpetrator, if given) to the Title IX coordinator. A report to a responsible employee constitutes a report to the College. The complainant will be informed of available resources and have options explained to him/her including choosing to file or not file a complaint of violation of campus policy or notifying law enforcement. Without reports to responsible employees, the College cannot investigate the incident or take appropriate steps to address the situation.
- This policy is intended to make students aware of the various reporting and confidential disclosure options available to them – so they can make informed choices about where to turn should they become a victim of Sexual Misconduct and Stalking. The College encourages complainants to talk to someone identified in one or more of these groups.

The options for reporting:

- **Privileged and Confidential Communications**
Professional, licensed counselors and pastoral counselors who provide mental-health counseling to members of the College community (and including those who act in that role under the supervision of a licensed counselor) are not required to report any information about an incident to the Title IX coordinator without a victim's permission. Counselors in the St. Louis College of Pharmacy Student Counseling Center are examples of professional counselors. For more information about counseling services at the College call 314.446.8338 and email michelle.hastings@stlcp.edu. The College currently does not have any pastoral counselors.
- **Reporting to "Responsible Employees"**
A "responsible employee" is a College employee who has the authority to redress Sexual Misconduct and Stalking, who has the duty to report incidents of Sexual Misconduct and Stalking or other student misconduct (see Section G titled "Clery Requirements, Timely Warning and/or

Emergency Notification”), or who a student could reasonably believe has this authority or duty (e.g. coaches, athletic directors, residence assistants, residence life staff, student activities staff, advisors to student organizations, faculty, administrators).

When a victim tells a responsible employee about an incident of Sexual Misconduct and Stalking, including sexual violence and files a complaint, the victim has the right to expect the College to take immediate and appropriate steps to investigate what happened and to resolve the matter promptly and equitably.

A responsible employee must report to the Title IX coordinator all relevant details about the alleged Sexual Misconduct and Stalking shared by the victim and that the College will need to determine what happened – including the names of the victim and alleged perpetrator(s), any witnesses, and any other relevant facts, including the date, time and specific location of the alleged incident.

To the extent possible, information reported to a responsible employee will be shared only with people responsible for handling the College’s response to the report except for instances of mandated reporting in Missouri, such as professionals reporting suspected child abuse or neglect. Before a victim reveals any information to a responsible employee, the employee should ensure that the victim understands the employee’s reporting obligations – and, if the victim wants to maintain confidentiality, direct the victim to confidential resources.

If the victim wants to tell the responsible employee what happened but also maintain confidentiality, the employee should tell the victim that the College will consider the request, but cannot guarantee that the College will be able to honor it. In reporting the details of the incident to the Title IX Coordinator, the responsible employee will also inform the Title IX Coordinator of the victim’s request for confidentiality.

Responsible employees will not pressure a victim to request confidentiality, but will honor and support the victim’s wishes, including for the College to fully investigate an incident. By the same token, responsible employees will not pressure a victim to make a full report if the victim is not ready to do so.

All faculty and staff, whether they are full-time or part-time, are responsible for supporting and assisting in the administration of this policy. Any employee, with the exception of a professional counselor, is required to contact the Title IX Coordinator immediately if Sexual Misconduct and Stalking is reported to that employee. Public Safety staff made aware of complaints will share them with the Title IX Coordinator immediately.

- Title IX Coordinator

If you have questions about the policy, if you believe that you are being harassed or retaliated against in violation of the Retaliation and Intimidation section of this policy, or if you observe someone else being subjected to such conduct, report this conduct to the Title IX Coordinator. The Title IX Coordinator enables the College to best assess, respond and investigate complaints to eliminate events, prevent their recurrence and address effects.

St. Louis College of Pharmacy’s Title IX Coordinator and Deputy Title IX Coordinator are:

Daniel Bauer, PHR Director, Human Resources
314.446.8308
daniel.bauer@stlcp.edu

- Rebecca Jones, Assistant Vice President Student Affairs
314.446.8352
rebecca.jones@stlcop.edu

The College does not disclose personal identifiable information about victims and alleged suspects in the daily crime and fire log and the campus crime statistics reported in the Annual Security and Fire Report.

Requesting Confidentiality from the College and how the College will weigh the request and respond

If a complainant discloses an incident to a responsible employee but wishes to maintain confidentiality or requests that no investigation into a particular incident be conducted or disciplinary action taken, the College must weigh that request against the College's obligation to provide a safe, non-discriminatory environment for all students, faculty, staff and visitors, including the victim. If the College honors the request for confidentiality, a victim must understand that the College's ability to meaningfully investigate the incident and pursue disciplinary action against the alleged perpetrator(s) may be limited.

Although rare, there are times when the College may not be able to honor a victim's request in order to provide a safe environment for all students, faculty, staff and visitors.

The College has designated individual(s) to evaluate requests for confidentiality once a responsible employee is on notice of alleged sexual misconduct and stalking – Title IX Coordinator, Deputy Title IX Coordinators, and Title IX Investigators.

When weighing a victim's request for confidentiality or that no investigation or discipline be pursued, the Title IX team will consider a range of factors, including the following:

- The legal obligations of the College
- The increased risk that the alleged perpetrator will commit additional acts of Sexual Misconduct and Stalking or other violence, such as:
 - Whether there have been other complaints about the same alleged perpetrator
 - Whether the alleged perpetrator has a history of arrests or records from a prior institution indicating a history of violence
 - Whether the alleged perpetrator threatened further Sexual Misconduct and Stalking or other violence against the victim or others
 - Whether the Sexual Misconduct and Stalking was committed by multiple perpetrators
- Whether the Sexual Misconduct and Stalking was perpetrated with a weapon
- Whether the victim is a minor
- Whether the College possesses other means to obtain relevant evidence of the incident (e.g., security cameras or personnel, physical evidence)
- Whether the victim's report reveals a pattern of perpetration (e.g., via illicit use of drugs or alcohol) at a given location or by a particular group

The presence of one or more of these factors could lead the College to investigate and, if appropriate, pursue disciplinary action. If none of these factors is present, the College will likely respect the victim's request for confidentiality.

Even if the request for confidentiality is granted the College may take steps to limit the effects of the alleged misconduct and prevent its occurrence without initiating a formal action against the alleged perpetrator or revealing the identity of the student. This may include increased monitoring, security or additional training or communication efforts for students or employees.

If the College determines it cannot maintain a victim’s confidentiality:

The College will inform the victim prior to starting an investigation and will, to the extent possible, only share information with people responsible for handling the College’s response.

The College will remain ever mindful of the victim’s well-being, and will take ongoing steps to protect the victim from retaliation or harm and work with the victim to create a safety plan. Retaliation against the victim, whether by students or College employees, will not be tolerated.

The College will also:

- Assist the victim in accessing other available victim advocacy, academic support, counseling, disability, health or mental health services, and legal assistance both on and off campus (see portion of policy identifying these)
- Provide other security and support, which could include issuing a no-contact order, helping arrange a change of living or working arrangements or course schedules (including for the alleged perpetrator pending the outcome of an investigation) or adjustments for assignments or tests
- Inform the victim of the right to report a crime to local law enforcement – and provide the victim with assistance if the victim wishes to do so

The College may not require a victim to participate in any investigation or disciplinary proceeding.

Because the College is under a continuing obligation to address the issue of Sexual Misconduct and Stalking campus-wide, reports of Sexual Misconduct and Stalking (including non-identifying reports) will also prompt the College to consider broader remedial action – such as increased monitoring, supervision or security at locations where the reported Sexual Misconduct and Stalking occurred; increasing education and prevention efforts, including to targeted groups; conducting climate assessments/victimization surveys; and/or revisiting its policies and practices.

If the College determines it can respect a victim’s request for confidentiality:

If the College determines that it can respect a victim’s request for confidentiality, the College will also take immediate action as necessary to protect and assist the victim.

Miscellaneous

Educational and Prevention Programs Policy Statement

St. Louis College of Pharmacy engages in comprehensive educational programming to prevent Sexual Misconduct and Stalking. Educational programming consists of primary prevention and awareness programs for all incoming students and new employees as well as ongoing awareness and prevention campaigns for students and faculty that identify and define Sexual Misconduct and Stalking, identify and define Consent for Sexual Harassment, Sexual Abuse, and Relationship Violence, provide safe and positive options for bystander intervention, provide risk reduction information, and provide information regarding the Clery Act and the Annual Security and Fire Report.

St. Louis College of Pharmacy has developed an annual educational campaign consisting of several media to reach the intended audiences including presentations and distribution of educational materials to new students; presentations during new employee orientation and annual policy updates for faculty and staff; continuing speaker series, awareness weeks and web-based training for faculty, staff, and students throughout the school year.

The College recognizes that at times many community members may put themselves in dangerous or risky situations and encourages all community members to offer help and assistance to others in need by taking reasonable and prudent actions to prevent or stop an act of discrimination, harassment, sexual misconduct, or relationship violence from occurring.

Interim Protective Measures

Upon receipt of a report, the complainant or respondent may request or the College may impose reasonable and appropriate interim measures to ensure the safety of all parties, the College community, and/or the integrity of the process. Interim protective measures will be considered by the Title IX Coordinator and appropriate administrators (College Services, Student Affairs for students, Human Resources for staff, and appropriate Dean for faculty).

Potential interim measures include:

- A St. Louis College of Pharmacy “no contact” order
- Access to counseling services and assistance in setting up the initial appointment
- Rescheduling of exams and assignments
- Change in class schedule or transferring section including late withdrawal from a class without penalty
- A change in work schedule or job assignment
- Change in Residence Hall assignment
- Providing an escort to ensure safe movement between classes and activities
- Academic support such as tutoring
- Leave of absence’
- Assistance with filing an order of protection

A victim may obtain an order of protection by contacting the St. Louis City Circuit Court (Civil Courts Building, 9th Floor, Adult Abuse Office, 10 N. Tucker, St. Louis, MO) or other appropriate jurisdiction.

Anonymous Reporting

The College encourages victims to talk to someone. Currently the College does not provide an online form for anonymous reporting, but a person may contact public safety at 314.446.SAFE (7233) or secuser@stlcp.edu 24 hours a day, seven days a week.

Off-Campus Counselors and Advocates

Off-campus counselors, advocates, and health care providers will also generally maintain confidentiality and not share information with the College unless the victim requests the disclosure and signs a consent or waiver form. Confidentiality is maintained as long as it is within the limits of the law (i.e. no harm to self, others, and no current abuse of a child or other vulnerable persons).

See Appendix A for off campus resources.

Immediate Assistance for Sexual Misconduct and Stalking

If you are a victim of Sexual Misconduct and Stalking, please contact the Office of Public Safety immediately by calling 314.446.SAFE (7233) and/or the St. Louis Metropolitan Police Department at 314.444.5385.

If you have been a victim of any Sexual Misconduct and Stalking, but especially sexual assault, the College’s priority response is to address the safety of the complainant. If the complainant is

uncomfortable contacting public safety or the St. Louis Metropolitan Police Department, they can notify a staff member of Student Affairs, Residential Life or Counseling Center for assistance. These College personnel will assist the victim in notifying the appropriate law enforcement authorities upon request. Students, faculty or staff who are victims of a Sexual Misconduct and Stalking will receive information regarding counseling opportunities on and off campus. Students can contact the Counseling Center at 314.446.8338 for further information. Faculty and staff can contact the Employee Assistance Program H&H Health Services at 314.845.8302 or 800.832.8302.

A complainant should report the incident to public safety and/or St. Louis Metropolitan Police Department, even if the victim does not want to press charges. This will allow the authorities to gather important evidence should the victim later change his/her mind. The complainant may choose to pursue the investigation through the criminal justice system and/or the College conduct/discipline system.

The Office of Public Safety will help the complainant get to a safe place and assist the person in seeking immediate medical treatment at a facility equipped to respond to medical issues related to sexual assault. Complainants will be instructed on getting medical treatment in order to preserve potential evidence by completing a Sexual Assault Forensic Examination (SAFE). Victims should make every effort to save anything that might assist in proving the commission of a crime such as the perpetrator's DNA. Therefore a victim should not: bathe or shower, use the restroom, change clothes, comb hair, clean up the crime scene or move or destroy anything that may have been touched.

Even if the victim has not yet decided to report the crime, receiving a forensic medical exam and keeping evidence safe from damage will improve the chances that the police can access and test the stored evidence at a later date. A victim does not have to give his/her name to receive the exam.

Coordination with Law Enforcement

St. Louis College of Pharmacy encourages complainants to pursue criminal action for incidents of Sexual Misconduct and Stalking that may also be crimes under Missouri or federal law. The College will also assist a complainant in making a criminal report and will cooperate with law enforcement agencies to pursue the criminal process to the extent permitted by law.

The College's policy, definitions and burden of proof may differ from Missouri and Federal law. A complainant may seek resolution through the College's complaint process, may pursue criminal action, may choose one but not the other, or may choose both. Law enforcement's determination whether or not to prosecute, or the outcome of any criminal prosecution, are not determinative of whether sexual abuse or relationship violence under the College's policy has occurred. Proceedings under the College's policies may be carried out prior to, simultaneously with, or following civil or criminal proceedings off-campus.

Clery Requirements, Timely Warning and/or Emergency Notification

Certain campus officials, known as Campus Security Authorities (CSA), have a duty to report sexual misconduct, as defined by applicable federal law, for federal statistical reporting purposes (Clery Act). All personally identifiable information is kept confidential, but statistical information must be passed along to public safety regarding the type of incident and its general location (on or off-campus, in the surrounding area, but no addresses are given) for publication in the Annual Security and Fire Report. Mandated reporters include: student/conduct affairs, public safety, local police, coaches, athletic directors, residence life staff, student activities staff, human resources staff, advisors to student organizations and any other official with significant responsibility for student and campus activities is a CSA. The information to be shared includes the date, the location of the incident (using Clery location categories) and the Clery crime category.

Victims of Sexual Misconduct and Stalking should also be aware that College administrators must issue immediate timely warnings for incidents reported to them that are confirmed to pose a substantial threat

of bodily harm or danger to members of the campus community. The College will make every effort to ensure that a victim's name and other identifying information is not disclosed, while still providing enough information for community members to make safety decisions in light of the danger.

Amnesty for Other Less Serious Policy Violations

St. Louis College of Pharmacy believes violations of this policy to be very serious offenses. The College will generally offer any student, whether the complainant or a third party, who reports 25 violations of this policy limited immunity from being charged for policy violations related to alcohol use and/or drug use, provided that such violation(s) did not and do not place the health and safety of any person at risk. The College may choose, however, to pursue educational interventions with those individuals.

False Reports

Due to the seriousness of these matters an individual who knowingly alleges a false claim against another will be subject to the full range of corrective action, up to and including termination or expulsion.

Written Explanation of Rights

Regardless of whether a victim elects to pursue a criminal complaint or pursue a College investigation, the College will assist victims of Sexual Harassment, Sexual Assault, Relationship Violence and Stalking with a written explanation of rights. Should an alleged perpetrator be named as respondent and a claim investigated, the respondent will receive a written copy of rights as well.

Resources

Campus and Community Resources

Number of campus and community resources are available to assist parties with Sexual Misconduct and Stalking issues. A list of resources will be provided to a complainant upon receipt of a complaint. A list is also included in Appendix A attached to this report.

Advisor in the Process

All of the individuals involved have the right to be assisted by an advisor provided by the College during the investigation and student conduct/employee disciplinary process. Parties have the right to consult a private attorney, at their own expense, regarding a complaint. Legal counsel may not participate in College conduct or disciplinary hearings, but may observe.

Sanctions/Discipline for Policy Violations

College disciplinary proceedings, as well as guidelines for cases involving Sexual Misconduct and Stalking are detailed in internal procedures. For the purpose of this policy, the outcome of a disciplinary proceeding means only the institution's final determination with respect to the alleged sex offense and any sanction/discipline that is imposed against the respondent. The responsible administrator will determine the appropriate sanction or disciplinary action based on the seriousness of the violations, the respective ages and positions of the complainant and the respondent, and whether there have been other complaints against the respondent. Note that while investigation records are private, sanctions become part of student records or personnel files.

- Faculty and staff disciplinary actions will be determined based on the policies and procedures governing discipline and appeals in the [Staff Handbook](#) and [Faculty Bylaws](#). Disciplinary action for offenses could include mandated counseling, written warning, suspension, and/or termination.

- Student sanctions for offenses may include, but are not limited to, formal warning, non-academic disciplinary probation, mandated counseling assessment, and denial of the right to hold an office in a student organization or to participate in College-sponsored extracurricular activities, campus restrictions, and/or other educational sanctions and non-academic suspension or dismissal from the College. Information outlining the disciplinary procedures, sanctions, and appeals can be found in the [Student Code of Conduct](#).
- If the offender is neither a student nor faculty or staff member and thus not subject to the College's direct control, the College will take such measures as it deems appropriate to remedy the matter. This may include barring the offender from College property.

Investigating and Adjudicating Complaints

The College's investigation policy provides a prompt, fair and impartial investigation and resolution process where the complainant and respondent are entitled to have the same opportunities to due process. The College approaches these investigations impartially and seeks to determine the facts and weighs those facts and evidence against the appropriate standards of evidence to determine violations of policy. The investigator will make a report to the Title IX Coordinator and appropriate administrator outlining the findings as to violations of this policy using a preponderance of the evidence standard (more likely than not).

- Individuals investigating complaints will receive annual training on issues related to Sexual Misconduct and Stalking. This training includes instruction on how to conduct an investigation and adjudication process that protects the rights of the complainant and respondent and promotes accountability.
- Both the complainant and the respondent have the opportunity to be advised as described in the resources section of this policy.
- The complainant and respondent will be notified simultaneously in writing of the outcome of any disciplinary proceedings, as well as any changes to those results or sanctions/disciplinary actions prior to the time that such results become final.
- The complainant and the respondent each have the right to appeal the outcome of any disciplinary hearing/determination and will be notified simultaneously in writing of the outcome after the appeal is resolved.

Human Resources is responsible for overseeing disciplinary proceedings involving staff members. The appropriate Dean is responsible for the disciplinary proceedings involving faculty. Office of Student Affairs handles non-academic disciplinary proceedings involving students. In some instances, an appropriate administrator will be designated to assist.

Notification to Victims of Crimes of Violence

The College will, upon written request, disclose to the alleged victim of a crime of violence or a non-forcible sex offense, the report on the results of any disciplinary proceeding conducted by such institution against a student or employee 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 this paragraph.

Harassment, Sexual Misconduct, Relationship Violence, and Stalking

College policy prohibits sexual assault, sexual harassment, dating violence, domestic violence, and stalking in addition to other related offenses. A copy of the College's Policy against Harassment, Sexual Misconduct, Relationship Violence, and Stalking is provided as Appendix A.

Sexual Assault Prevention and Health Programs

Sexual assaults continue to be a very serious problem facing many campuses today as the crime often goes underreported. The College offers several programs dealing with issues of sexual assault prevention.

Remember the Ribbon Week

Kappa Psi Pharmaceutical Fraternity (KY) and the Student National Pharmaceutical Association (SNPhA) and the Gay Straight Alliance (GSA) sponsors "Remember the Ribbon" programming support HIV/AIDS awareness including a lunch and learn about HIV/AIDS therapy, and other educational programming.

Stalking and Sexual Assault Awareness Months

The Office of Public Safety partners with Counseling, WHIG and BSA student groups to bring awareness to the campus community through informational booths, emails, flyers and presentations during the months of January and April.

Orientation Presentation on Sexual Assault, Consent, Responsible Drinking

During orientation for new students (traditional and transfer) Office of Student Affairs and Public Safety staff lead an in-person presentation discussing sexual assault awareness, what consent means, and methods to help protect friends as a bystander, as well as signs of abusive relationships.

Tripping the Threshold

Tripping The Threshold is a year-long series of activities and information that show students how to enjoy college life without "tripping over the threshold" where things cease to be fun and become problem behaviors. The emphasis is on healthy relationships, safe sex, and responsible partying. Emphasis is put upon knowing where the threshold/line is on issues like consensual sex vs. sexual assault, healthy relationships vs. interpersonal violence, responsible drinking vs. binge drinking/alcoholism, and avoiding drug use altogether. Several college departments have partnered with five campus fraternities to bring the message to students, particularly those who live on campus.

Welcome Back BBQ/Resources Fair

Culture and Campus Life staff host a booth at the annual Welcome Back BBQ and Resources Fair providing materials and highlighting services available to our students. Topics include recognizing signs of distress, suicide and unhealthy relationships and stalking, confidential counseling services available on campus and off campus.

Red Flag Campaign

The Red Flag campaign is a weeklong campaign that discusses domestic, dating violence and bystander intervention. Posters, emails to students, faculty and staff, as well as presentations open to the entire campus community highlight the week.

Suicide Prevention Week

The Campus Counseling Center sponsors a week long focus on suicide prevention, distributing materials to entire campus community at a booth and via email. In addition, speakers present on a pharmacist's role in recognizing and assisting patients at risk.

Policy Distribution

At the beginning of the semester the College's policy against sexual assault, relationship violence and stalking is distributed via email to all faculty, staff and students.

Annual Policy Review

On an annual basis Human Resources distributes and provides a presentation to all faculty and staff defining and describing what to do in cases of sexual harassment, sexual assault, relationship violence and stalking. The presentation includes confidential and non-confidential reporting mechanisms as well as the obligations of responsible employees.

Campus Sex Crimes Prevention Act

The Campus Sex Crimes Prevention Act (CSCPA) of 2000 is a federal law that provides for the tracking of convicted sex offenders enrolled at, or employed by, institutions of higher education. The CSCPA is an amendment to the Jacob Wetterling Crimes against Children and Sexually Violent Offender Act.

Under the Campus Sex Crimes Prevention Act, persons required to register under a state offender registration program must notify the state concerning each post-secondary school at which the offender works or is a student. The State of Missouri has developed a state wide registry list. I have attached the link below to further assist you in your search. The Revised Statutes of Missouri, Sections 589.400 to 589.425 and 43.650, RSMo., mandate that the Missouri State Highway Patrol shall maintain a sex offender database and a web site on the Internet that is accessible to the public. The information on the web site refers only to persons who have been convicted of, found guilty of or plead guilty to committing or attempting to commit sexual offenses and may not reflect the entire criminal history of a particular individual. Offenders required to register for crimes of kidnapping, felonious restraint or child abuse may not be listed.

State of Missouri Sex Offender Registry

Located online at mshp.dps.mo.gov/CJ38/search.jsp, the CSCPA further amends the Family Educational Rights and Privacy Act of 1974 (FERPA) to clarify that nothing in the Act can prohibit an educational institution from disclosing information provided to the institution concerning registered sex offenders.

Crime Log

The Office of Public Safety maintains a daily crime log that records, by the date the incident was reported, all crimes and other serious incidents that occur on campus, on or in a non-campus building or property, on public property, or within the patrol area of public safety. The Daily Crime Log is online at <http://stlcop.edu/safety/clery/log.html>. Our process for maintaining and posting the Daily Crime Log complies with the Jeanne Clery Disclosure of Campus Security Policy as updated by the Violence Against Women Reauthorization Act of 2013 (VAWA), Campus Sexual Violence Elimination Act (Campus SaVE Act) and Campus Crime Statistics Act (as amended in October 1998).

The Daily Crime Log includes:

- The nature, date, time, and general location of each crime reported to us
- The disposition of the complaint, if the disposition is known at the time the log is created

The public safety posts specific incidents in the Daily Crime Log within two business days of receiving a report of an incident. We reserve the right to exclude crime report information from the log under these circumstances:

- If posting the information jeopardizes an on-going investigation
- If posting the information would cause a suspect to flee or evade detection
- If posting the information could result in the destruction of evidence relating to the crime

Once these factors are no longer present, and/or there is no longer a chance that posting the information would adversely affect an on-going investigation, we will post the information. We make available the most recent 60 days of crime logs during normal business hours. If you wish to view Daily Crime Logs older than the most recent 60 days, please contact the Director of Public Safety at 314.446.8382. Information on the fire log can be found on page 38.

Missing Students Who Reside in On-Campus Housing

If a member of the College community has reason to believe that a student who resides in on-campus housing is missing, he or she should immediately notify public safety at 314.446.SAFE (7223). All St. Louis College of Pharmacy officials are required to notify public safety immediately upon being notified about a missing student. Public safety will generate a missing person report and initiate an investigation. You may also complete a missing person's report at <http://stlcop.edu/safety/missing-persons-policy.html>

After investigating the missing person report, should public safety determine the student is missing and has been missing for more than 24 hours, Public safety will notify the St. Louis Metropolitan Police Department and the student's confidential contact. Even if the student has not registered a contact person through residence life, the College will contact the police department. Contact will be made no later than 24 hours after the student is determined to be missing. If the missing student is under the age of 18 and is not an emancipated individual, the College will notify the student's parent or legal guardian immediately after public safety has determined that the student has been missing more than 24 hours.

In addition to registering an emergency contact, students residing in on-campus housing have the option to identify confidentially an individual to be contacted by the College in the event the student is determined to be missing more than 24 hours. Students who wish to identify a confidential contact can do so by contacting the Residential Life office. This information is confidential, accessible by authorized campus officials and law enforcement only, and will not be disclosed outside of a missing person investigation. Should the investigation determine the student is missing prior to 24 hours, these procedures will be implemented immediately. For further information on missing persons reporting please go to the [missing persons reporting policy](#).

Crime Statistics

The following pages contain crime statistics for the last three reporting years categorized by type of crime and whether the occurrence was on campus, non-campus or public property.

The charts also specifically separate statistics for on-campus residential areas.

2018 Crime Statistics for St. Louis College of Pharmacy

	All On Campus Property				Non-Campus Property				Public Property				GRAND TOTAL	On Campus Residential Only			
	Reported to Public Safety	Reported to Metro Police Dept.	Reported to non-police	Sub-Total	Reported to Public Safety	Reported to Metro Police Dept.	Reported to non-police	Sub-Total	Reported to Public Safety	Reported to Metro Police Dept.	Reported to non-police	Sub-Total		Reported to Public Safety	Reported to Metro Police Dept.	Reported to non-police	Section Total
Primary Criminal Offenses																	
Murder/Non-Negligent Manslaughter	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Negligent Manslaughter	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Robbery	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Aggravated Assault	1	0	0	1	0	0	0	0	0	0	0	0	0	1	0	0	0
Motor Vehicle Theft	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Arson	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Burglary	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Rape	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Fondling	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Incest	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Statutory Rape	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
VAWA																	
Dating Violence	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Domestic Violence	1	0	0	1	0	0	0	0	0	0	0	0	0	1	0	0	0
Stalking	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Referrals/Arrests (Total)																	
Liquor Law Arrests	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Liquor Law Violations Referred for Disciplinary Action	10	0	7	0	0	0	0	0	0	0	0	0	17	10	0	7	17
Drug Law Arrests	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Drug Law Violations Referred for Disciplinary Action	4	0	1	5	0	0	0	0	0	0	0	0	5	4	0	1	5
Illegal Weapons Possession Arrests	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Illegal Weapon Possession Violations Referred for Disciplinary Action	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

2017 Crime Statistics for St. Louis College of Pharmacy

	All On Campus Property				Non-Campus Property				Public Property				GRAND TOTAL	On Campus Residential Only			
	Reported to Public Safety	Reported to Metro Police Dept.	Reported to non-police	Sub-Total	Reported to Public Safety	Reported to Metro Police Dept.	Reported to non-police	Sub-Total	Reported to Public Safety	Reported to Metro Police Dept.	Reported to non-police	Sub-Total		Reported to Public Safety	Reported to Metro Police Dept.	Reported to non-police	Section Total
Murder/Non-Negligent Manslaughter	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Negligent Manslaughter	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Robbery	1	1	0	2	0	0	0	0	0	0	0	0	2	0	0	0	0
Aggravated Assault	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Motor Vehicle Theft	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Arson	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Burglary (Total)																	
Forcible Burglary	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Non-Forcible Burglary	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Sex Offenses, Forcible (Total)																	
Forcible Rape	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Forcible Sodomy	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Sexual Assault w/ Object	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Forcible Fondling	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Sex Offenses, Non-Forcible (Total)																	
Incest	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Statutory Rape	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Violence Against Women Act (Total)																	
Dating Violence	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Domestic Violence	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Stalking	0	0	1	1	0	0	0	0	0	0	0	0	1	0	0	0	0
Referrals/Arrests (Total)																	
Liquor Law Arrests	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Liquor Law Violations Referred for Disciplinary Action	5	0	0	5	0	0	0	0	0	0	0	0	5	5	0	0	5
Drug Law Arrests	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Drug Law Violations Referred for Disciplinary Action	5	0	0	5	0	0	0	0	0	0	0	0	5	5	0	0	5
Illegal Weapons Possession Arrests	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Illegal Weapon Possession Violations Referred for Disciplinary Action	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

2016 Crime Statistics for St. Louis College of Pharmacy

	All On Campus Property				Non-Campus Property				Public Property				GRAND TOTAL	On Campus Residential Only			
	Reported to Public Safety	Reported to Metro Police Dept.	Reported to non-police	Sub-Total	Reported to Public Safety	Reported to Metro Police Dept.	Reported to non-police	Sub-Total	Reported to Public Safety	Reported to Metro Police Dept.	Reported to non-police	Sub-Total		Reported to Public Safety	Reported to Metro Police Dept.	Reported to non-police	Section Total
Murder/Non-Negligent Manslaughter	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Negligent Manslaughter	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Robbery	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Aggravated Assault	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Motor Vehicle Theft	0	0	0	0	1	0	0	1	0	0	0	0	0	0	0	0	
Arson	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Burglary (Total)																	
Forcible Burglary	16	0	0	16	0	0	0	0	0	0	0	0	16	0	0	16	
Non-Forcible Burglary	15	0	0	15	0	0	0	0	0	0	0	0	15	0	0	15	
Sex Offenses, Forcible (Total)																	
Forcible Rape	1	0	0	1	0	0	0	0	0	0	0	0	1	0	0	1	
Forcible Sodomy	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Sexual Assault w/ Object	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Forcible Fondling	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Sex Offenses, Non-Forcible (Total)																	
Incest	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Statutory Rape	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Violence Against Women Act (Total)																	
Dating Violence	1	0	0	1	0	0	0	0	0	0	0	0	1	0	0	1	
Domestic Violence	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Stalking	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Referrals/Arrests (Total)																	
Liquor Law Arrests	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Liquor Law Violations Referred for Disciplinary Action	15	0	0	15	0	0	0	0	0	0	0	0	15	0	0	14	
Drug Law Arrests	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Drug Law Violations Referred for Disciplinary Action	5	0	0	5	0	0	0	0	0	0	0	0	5	0	0	5	
Illegal Weapons Possession Arrests	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Illegal Weapon Possession Violations Referred for Disciplinary Action	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	

No hate crimes were reported during the calendar years 2016 through 2018.

Part B ANNUAL FIRE SAFETY REPORT

Annual Fire Safety Report

St. Louis College of Pharmacy has an overall fire protection policy that is designed to provide a place of employment that is free from recognized hazards that cause or are likely to cause death or serious physical harm to employees, students or the public. Therefore, all campus facilities have fire protection equipment to minimize the results from fire hazards. When fire hazards exist that cannot be eliminated, then engineering practices, administrative practices, safe work practices, and proper training regarding fire protection has been implemented. These measures have been implemented to minimize those hazards in order to ensure the safety of students, employees and the public.

Fire Definitions

- **Class A:** Fires that involve ordinary combustible solids or “surface burning fires.” Examples of Class A fires include wood, clothing, plastics, paper, and asphalt.
- **Class B:** Fires that involve gases, greases, and flammable combustible liquids. Examples of Class B fires include gasoline, kerosene, alcohol, and lubricating oils and greases.
- **Class C:** Fires that involve electrical circuits of electrical equipment or fires near such equipment. Examples of Class C fires include electrical motors, switch boxes, junction boxes, transformers, and energized or live wires.
- **Class D Fires:** Fires that involve electrical circuits of electrical equipment or fires near such equipment. Examples of Class C fires include electrical motors, switch boxes, junction boxes, transformers, and energized or live wires.
- **Class K Fires:** Class K Fires are technically a subclass of class B flames, since it involves flammable liquid. However, because of some unique characteristics related to this type of fire, it was designated separately and requires a distinct battling method. Class K fires burn a specific type of fuel, namely cooking fat and oils, and can spread quickly, causing damage and potential injury.

Policy Statements on Smoking, Open Flames, and Cooking Fuels

Smoking is only allowed in designated outdoor areas located on St. Louis College of Pharmacy property. Open flame lighted candles or other open flames are NOT permitted in any College facility (outside of specific labs) unless under special supervision of properly authorized personnel trained in fire safety. No candles are allowed in dorm rooms or offices. In laboratories, no flame should be left unattended! Sterno type gel fuel may be used for food warming at approved events, as long as the criteria outlined in the overall fire protection policy are adhered to. Only small amounts of Sterno gel type fuel shall be stored in closed containers in a cool dry place (40-120°F) away from sources of heat or open flame. If large amounts of Sterno gel type fuel need to be stored in a College building, the users must contact the Emergency Management and EH&S Office to determine appropriate storage requirements. See [fire safety policy](#) for further.

Policy Statement on Holiday and Other Decorations

The following regulations concerning Christmas and holiday decorations have been established because of the extreme dangers of fire present during the holiday season:

- No live Christmas trees will be permitted in any College building for decorative purposes.
- Noncombustible artificial trees will be acceptable if wiring for lights and decorations meet UL requirements and have been approved by Facilities.

- No evergreen or cedar branches, combustible cotton, combustible angel hair or other combustible materials are permitted to be used on the doors, bulletin boards or other exit hallway locations for decorations.

Any decorations on campus shall meet the following requirements:

- Be of fire resistant material, preferably noncombustible material such as foil, metal or glass.
- No decorations shall obstruct any exits, smoke detectors, fire alarms, pull stations (alarms), fire extinguishers or sprinklers.
- Outdoor decorations shall be self-supporting and be placed as far away from buildings or additions as possible. In no case shall decorations be less than 10 feet from a building or addition. "No Smoking" shall be observed in the vicinity of any outdoor decoration during construction, use, and demolition.
- All decorations shall be removed within 48 hours following the event for which they are used.

For further information see the [fire safety policy](#).

Policy Statement on Electrical Wiring and Appliances

All extension cords, wiring, and space heaters must be approved by Facilities before power is authorized. Access to all electrical breaker panels should be clear and open at all times. The use of extension cords, power strips, surge protectors and similar devices shall be limited should be review by Facilities and/or Environmental Health & Safety. Under no circumstances shall "daisy chaining" of surge protectors or power strips be permitted as a permanent solution to satisfy power requirements. Double or triple plugs to expand capacity are not permitted and extension cords must be UL listed and a minimum of 16-2 cord.

Only those persons who are qualified and authorized may install, fabricate, repair, test, calibrate, or modify electrical wiring, devices, systems, or equipment. Qualification and authorization to perform electrical or electronics work is based on a combination of formal training, experience, and on-the-job training. The qualified individual has had sufficient, documented training and experience and can demonstrate appropriate knowledge and skills to be able to work on electrical equipment, whether energized or de-energized.

Cooking appliances with a heating element (e.g. crock pot, toaster, Foreman grill, etc.) and microwaves are not allowed in students' rooms. However, a community microwave is furnished in the floor kitchenette at the east end of each hallway. The above items are permitted in the South Residence Hall apartment style dorms.

Immediately report malfunctioning electrical devices to resident assistants, resident manager or Facilities. See the [fire safety policy](#) for further.

Basic Fire Procedures

Fires are categorized as either small or large scale fires regardless of source or type. A small fire is considered to be something the size of a standard office trash can or less and can be handled with one fire extinguisher.

The procedure for handling a small fire is as follows:

1. Notify public safety
2. Obtain backup
3. If trained, extinguish the fire with the appropriate extinguisher

4. If the fire is not extinguished with one fire extinguisher or with in 1 minute, then exit the area, close the door, activate the fire alarm and tell others as you evacuate the building.

A large fire is considered to be anything greater than a standard office trash can or requires the use of more than one fire extinguisher.

The procedure for handling a small fire is as follows:

1. Notify public safety
2. Close the door, activate the pull station and tell others as you evacuate the building.
3. Evacuate to emergency assembly point and report to the building emergency coordinator (BEC). The BEC will notify public safety or the Fire Department of the number and location of missing persons. Do not return to the building.
4. Wait at the assembly point for further instructions and follow directions explicitly.

The use of the fire extinguisher to put out a fire is voluntary. Do not use the fire extinguisher, unless you have been trained and feel comfortable, have backup, and have called public safety to notify the fire department. Leave the area if the fire is not extinguished with one fire extinguisher or in one minute.

Suggestions for the use of a fire extinguisher can be remembered by the acronym **PASS**.

PASS:

1. Pull the pin
2. Aim the extinguisher at the base of the flame
3. Squeeze the trigger
4. Sweep from side to side at the base or source of the fire, and approach the fire slowly, keeping an exit behind your back
5. Fire extinguisher must be held in an upright, vertical position

Any employee, student, or visitor that becomes aware of a fire that requires activation of the building systems shall immediately activate the building fire alarm system. The fire alarm system will in turn notify all building occupants that a fire emergency exists. This is accomplished through sounding an audible alarm and a visual flashing light. All employees, students and visitors will regard any activation of a fire alarm as a true fire emergency unless there has been previous notification of a test being conducted.

All fires regardless of size must be reported to the Office of Public Safety at ext. SAFE (7233) for proper investigation.

Fire Drills

The Office of Public Safety, building emergency coordinators, floor leaders, residential life and facilities work together to conduct unannounced fire drills for each building throughout the calendar year. During the drills, the alarms are sounded and staff members make a check of all rooms to verify all faculty, staff and students have exited the buildings. All faculty, staff and students are instructed to congregate at the evacuation sites as instructed in the Building Emergency Action Plan for each individual building. Students not leaving the buildings during a fire alarm drill are referred to residential life for judicial sanctions. Faculty and staff not leaving the building are reported to the appropriate supervisor.

Fire Drill Results for 2018

Date	Location	Evacuation Time (min)
10/08/2018 2:58pm	South Residence Hall	12 minutes
10/08/2018	Academic and Research Building	9 minutes
10/09/2018	Jones Hall	5 minutes
10/09/2018	Recreational Athletic Student Center	8 minutes
10/30/2018 7:10pm	South Residence Hall	8 minutes

Evacuation Procedures

In the event of a fire in the buildings, the College community members should contact public safety immediately, quickly shut the door/windows to their room and proceed to the nearest exit where they can leave the building safely. If the alarm has not sounded, please activate the nearest pull station if you can do so safely. Do not use an elevator while the alarm is activated. Upon exiting the building, personnel are to proceed to the emergency assembly points listed below and await further instructions.

Emergency Assembly Points

Building Name	Location
Residence Hall/Cafeteria	Southern end of the Quad
Childrens Parking Garage	Southern end of the Quad
Jones Hall	Lawn East of Jones Hall
RAS	North end of the Quad
ARB	East end of the Quad

Fire Safety Education and Training

Fire extinguishers are located in each of the buildings on campus, to include the Alumni House and may only be used in case of a fire. Fire extinguisher safety training is provided at the beginning of the academic year and to faculty, staff and RAs in the fall and spring. Additional fire safety training is available upon request by contacting the Office of Public Safety.

Residence Hall and Dining Hall

St. Louis College of Pharmacy currently has two residence halls with an attached dining halls on campus. Each room has hard-wired detector that upon activation, horns and strobes will activate and an alarm will be sent to the monitoring company who will dispatch the fire department. The buildings also have sprinkler systems and fire extinguishers throughout. Kitchen extinguishing systems are also considered fixed extinguishing systems. They are used in areas that contain cooking equipment (e.g. fryers) that uses oil or grease and could be highly susceptible to fire. These systems are designed to saponify the oils/grease and cool the entire mass of oil below its auto-ignition point thus extinguishing the fire, will be inspected every 6 months by an approved outside contractor to ensure their operation is sufficient.

Campus Fire Safety Systems Testing

All fire safety systems and ancillary components are tested on an annual basis by an outside service contractor. All horns, strobes, panels, smoke detectors, pull stations and duct detectors are tested and documented and all necessary repairs/adjustments are coordinated with the service contractor. The service contractor also both kitchen suppression systems and all fire extinguishers on campus.

Microwave Sensor Program

All microwaves in the North Residence Hall and Cafeteria have been outfitted with a Safe-T-Sensor™ which prevents anyone from overheating food in the microwave and causing smoke/fire which to be produced. In years past, the addition of these devices, we are able to cut down on the amount of false alarms in the residence hall and cafeteria that were related to the overcooking of food items.

Future Improvements

As we continue to add and upgrade our facilities, the College will continue to look at ways to improve our fire safety, including providing additional training opportunities to our community members.

Fire Log

The daily fire log is done in conjunction with our daily crime log. You can also obtain a hard copy of the log by stopping by the Office of Public Safety. There is no charge for the document.

Fire Statistics

The Higher Education Opportunity Act, enacted on August 14, 2008, requires institutions that maintain on-campus student housing facilities to publish an annual fire safety report that contain information about campus fire safety practices and standards of the institution.

2018 Fire Statistics for On-campus Student Housing and Dining Hall Facilities

Residence Hall	No. of Fires	Cause	Injuries/Deaths	Property Damage Value (\$)
South Residence Hall	0	N/A	0	\$0
North Residence Hall	0	N/A	0	\$0

2017 Fire Statistics for On-campus Student Housing and Dining Hall Facilities

Residence Hall	No. of Fires	Cause	Injuries/Deaths	Property Damage Value (\$)
South Residence Hall	0	N/A	0	\$0
North Residence Hall	0	N/A	0	\$0

2016 Fire Statistics for On-campus Student Housing and Dining Hall Facilities

Residence Hall	No. of Fires	Cause	Injuries/Deaths	Property Damage Value (\$)
Residence Hall/Dining Hall	0	N/A	0	\$0

Clery Act Definitions

Crime Class Definitions

- **Murder and Non-negligent Manslaughter:** The willful (non-negligent) killing of one human being by another.
- **Negligent Manslaughter:** The killing of another person through gross negligence.
- **Sex Offense Forcible (F):** Any sexual act directed against another person, forcibly and/or against that person's will; or not forcibly or against the person's will where the victim is incapable of giving consent: forcible rape; forcible sodomy; sexual assault with an object; forcible fondling and attempted rape.
- **Sex Offense Non-forcible:** Unlawful, non-forcible sexual intercourse: incest, statutory rape.
- **Robbery:** The taking or attempting to take anything of value from the care, custody, or control of a person or persons by force or threat of force or violence and/or by putting the victim in fear.
- **Aggravated Assault:** An unlawful attack by one person upon another for the purpose of inflicting severe or aggravated bodily injury. This type of assault is usually accompanied by the use of a weapon or by means likely to produce death or great bodily harm. (It is not necessary that injury result from an aggravated assault when a gun, knife, or other weapon is used which could and probably would result in serious personal injury if the crime were successfully completed.)
- **Burglary:** The unlawful entry of a structure to commit a felony or a theft. For reporting purposes this definition includes: unlawful entry with intent to commit a larceny or felony; breaking and entering with intent to commit a larceny; housebreaking; safecracking; and all attempts to commit any of the aforementioned.
- **Motor Vehicle Theft:** The theft or attempted theft of a motor vehicle. (Classify as motor vehicle theft all cases where automobiles are taken by persons not having lawful access even though the vehicles are later abandoned—including joyriding. Carjacking is not included in this category it is considered a robbery.)
- **Arson:** Any willful or malicious burning or attempt to burn, with or without intent to defraud, a dwelling house, public building, motor vehicle or aircraft, personal property of another, etc.
- **Disciplinary Referrals:** Incidents in which a student was not arrested but was referred for campus disciplinary action for liquor law violations, drug law violations, and illegal weapons possession. Do not include disciplinary referrals for violation of university policy if there was no violation of the law. For example, if a student of legal drinking age violates a "dry campus" policy and is referred for disciplinary action, this statistic should not be included in the crime statistics.
- **Liquor Law Violation:** The violation of laws or ordinances prohibiting: the manufacture, sale, transporting, furnishing, possessing of intoxicating liquor; maintaining unlawful drinking places; bootlegging; operating a still, furnishing liquor to a minor or intemperate person; using a vehicle for illegal transportation of liquor; drinking on a train or public conveyance; any attempts to commit any of the foregoing violations. This list does not include public drunkenness and driving under the influence.
- **Drug Law Violation:** Violations of State and local laws related to the possession, sale, use, growing, manufacturing, and making of narcotic drugs. The relevant substances include; opium or

cocaine and their derivatives (morphine, heroin, codeine); marijuana; synthetic narcotics (Demerol, methadone); and dangerous non-narcotic drugs (barbiturates, Benzedrine).

- **Weapon Law Violation:** The violation of laws or ordinances regulating weapons.
- **Hate Crimes:** Any crime that manifests evidence that the victim was intentionally selected because of the victim's actual or perceived race; religion; gender; sexual orientation; ethnicity or physical/mental disabilities. The following crimes only apply to hate crime reporting:
- **Larceny-Theft:** The unlawful taking, carrying, leading, or riding away of property from the possession or constructive possession of another. (Note: Constructive possession is defined by Black's Law Dictionary, 6th ed. as "where one does not have physical custody or possession, but is in a position to exercise dominion or control over a thing.")
 - Pocket-picking – The theft of articles from another person's physical possession by stealth where the victim usually does not become immediately aware of the theft.
 - Purse-snatching – The grabbing or snatching of a purse, handbag, etc., from the physical possession of another person. Shoplifting: The theft, by someone other than an employee of the victim, of goods or merchandise exposed for sale.
 - Theft From Building – A theft from within a building that is either open to the public or where the offender has legal access.
 - Theft from Coin Operated Machine or Device – A theft from a machine or device that is operated or activated by the use of coins.
 - Theft from Motor Vehicle (Except "Theft of Motor Vehicle Parts or Accessories") – The theft of articles from a motor vehicle, whether locked or unlocked.
 - Theft of Motor Vehicle Parts or Accessories – The theft of any part or accessory affixed to the interior or exterior of a motor vehicle in a manner that would make the item an attachment of the vehicle, or necessary for its operation.
 - All Other Larceny – All thefts that do not fit any of the definitions of the specific subcategories of Larceny/Theft listed above.
- **Vandalism:** To willfully or maliciously destroy, injure, disfigure, or deface any public or private property, real or personal, without the consent of the owner or person having custody or control by cutting, tearing, breaking, marking, painting, drawing, covering with filth, or any other such means as may be specified by local law.
- **Intimidation:** To intentionally say or do something which would cause a person of ordinary sensibilities to be fearful of bodily harm.
- **Destruction/Damage/Vandalism of Property (Except "Arson"):** To willfully or maliciously destroy, damage, deface, or otherwise injure real or personal property without the consent of the owner or the person having custody or control of it.
- **Simple Assault:** An unlawful physical attack by one person upon another where neither the offender displays a weapon, nor the victim suffers obvious severe or aggravated bodily injury involving apparent broken bones, loss of teeth, possible internal injury, severe laceration, or loss consciousness

Violence Against Women Act (VAWA) Definitions

Dating Violence

Violence committed by a person who is or has been in a social relationship of a romantic or intimate nature with the victim.

- (1) The existence of such a relationship shall be determined based on the reporting party's statement and with consideration of the length of the relationship, the type of relationship, and the frequency of interaction between the persons involved in the relationship.
- (2) For the purpose of this definition, dating violence includes but is not limited to, sexual or physical abuse or the threat of such abuse and does not include acts covered under the definition of domestic violence.

Domestic Violence

A felony or misdemeanor crime of violence committed:

- (1) By a current or former spouse or intimate partner of the victim.
- (2) By a person with whom the victim shares a child in common.
- (3) By a person who is cohabitating with or has cohabitated with the victim as a spouse or intimate partner.
- (4) By a person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction in which the crime of violence occurred.
- (5) By any other person against an adult or youth victim who is protected from that person's acts under the domestic or family violence laws of the jurisdiction in which the crime of violence occurred.

Stalking

Engaging in a course of conduct directed at a specific person that would cause a reasonable person to:

- (1) Fear for the person's safety or the safety of others; or
- (2) Suffer substantial emotional distress.
- (3) For the purpose of this definition, course of conduct means two or more acts, including, but not limited to, acts in which the stalker directly, indirectly, or through third parties, by any action, method device, or means follows, monitors, observes, surveils, threatens, or communicates to or about, a person, or interferes with a person's property. Substantial emotional distress means significant mental suffering or anguish that may, but does not necessarily, require medical or other professional treatment or counseling. Reasonable person means a reasonable person under similar circumstances and with similar identities to the victim.
- (4) Report the location as where a perpetrator engaged in the stalking course of conduct or where a victim first became aware of the stalking.
- (5) Report any additional behaviors that meet the above definition of Stalking if they occur or continue to occur after an official intervention has been put in place, including, but not limited to, an institutional disciplinary action or the issuance of a no contact order, restraining order or any warning by the institution or a court.

Location Definitions

Campus

Any building or property owned or controlled by an institution within the same reasonably contiguous geographic area and used by the institution in direct support of, or in a manner related to, the institution's educational purposes, including residence halls; and (ii) any building or property that is within or reasonably contiguous to the area identified in paragraph (i) of this definition, that is owned by the institution but controlled by another person, is frequently used by students and supports institutional purposes (such as a food or other retail vendor).

Affiliated/Non-Campus

Any building or property owned or controlled by a student organization that is officially recognized by the institution; or (ii) any building or property owned or controlled by an institution that is used in direct support of, or in relation to the institution's educational purposes, is frequently used by students, and is not within the same reasonably contiguous geographic area of the institution.

Include in this category repeated use of a non-campus location. For example, if every year students in the debate club take a trip to Washington, DC and stay at the same hotel, you must report any Clery crimes occurring in certain portions of the hotel such as hotel rooms rented to students, elevators, lobbies, etc.

Note: A revision of the Clery Act requires inclusion of the above crimes committed at non-campus locations that are repeatedly used by student groups. For example, if every year students in the debate club take a trip to Washington, DC and stay at the same hotel, any Clery crimes occurring during their stay in certain portions of the hotel such as hotel rooms rented to students, elevators, lobbies, etc. must be reported. Faculty and staff members accompanying these students must report the Clery crimes committed at the non-campus locations to their departmental CSAs.

Housing

Residence halls or other university-owned residences.

Public Property

"Public property" is defined by the Clery Act regulations as all public property including thoroughfares, streets, sidewalks, and parking facilities that are within the campus, or immediately adjacent to and accessible from the campus. Include the sidewalk across the street from the campus, but do not include public property beyond the sidewalk.

APPENDIX A



Human Resources *Policy against Harassment, Sexual Misconduct, Relationship Violence, and Stalking*

Applies to: (examples; Faculty, Staff, Students, etc)

Faculty, Staff, Students, Contractors, Vendors

Policy Overview:

Issued: 04-10-2013

Next Review Date: `$_SerializerTool.serialize($reviewDate,true)`

Frequency of Review: Annually

This policy covers the College's policy against harassment, sexual misconduct, relationship violence and stalking as well as support and investigation guidelines.

This policy applies to all faculty, staff, students, and others (guests, contractors and visitors) (herein collectively referred to as "Covered Persons").

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Details:

1 Policy against Harassment, Sexual Misconduct, Relationship Violence, and Stalking

1.1 Policy Statement

St. Louis College of Pharmacy ("STLCOP" or "College") prohibits harassment, sexual misconduct, relationship violence and stalking (as defined below), both on and off campus. It also prohibits direct or indirect "retaliation" (as defined below) against any person filing a complaint or taking part in an investigation under this Policy. The College takes the safety and well-being of its students, faculty and staff seriously and offers many forms of education and support to prevent harassment, sexual misconduct, relationship violence and stalking, and to support the College community in the event that sexual misconduct and stalking does occur.

College personnel and students who violate this policy are subject to the grievance and disciplinary procedures of the College and such civil and criminal laws as may apply. The College will impose sanctions against personnel and students for violations of this policy including, but not limited to, suspension, involuntary separation and referral to appropriate law enforcement authorities.

This policy and associated procedures are designed to achieve the following goals:

- Cultivate a climate of empowerment and education in which the entire campus community understands behavioral standards and prohibited conduct.
- Create an environment that facilitates the prompt reporting of sexual misconduct and stalking offenses through clear and easily understood processes.
- Provide prompt and compassionate support services for claimants (individuals bringing the complaint), respondents (individuals accused of violating this policy), and other parties involved in or affected by an incident.
- Ensure that the College is made aware of incidents that require criminal or other reporting and ensure that such reporting takes place in a prompt and effective manner.
- Provide clear reporting procedures and clear explanations of confidentiality and privacy issues.
- Provide effective investigation, evaluation and adjudication of reports of harassment, sexual misconduct, relationship violence, and stalking guided by principles of fairness while maintaining the College's obligation to the safety and security of its community.
- Comply with the requirements of the Clery Act, Violence Against Women Act, Title VI, Title VII, Title IX, the Rehabilitation Act of 1973, the Americans with Disabilities Act, and applicable state and federal laws.

1.2 Covered Persons

This policy applies to all faculty, staff, students and others (guests, contractors and visitors) (collectively referred to as "covered persons").

1.3 Definitions of Parties Involved

For the purpose of this policy, the following definitions will apply:

Complainant: A party who provides notice to the College by filing a report of a violation of policy. This includes any person who is reported to have experienced a violation of policy.

Respondent: A party who is named in a report as a violator of policy by the Complainant.

2 Definitions of Prohibited Conduct

The term "prohibited conduct" for the purposes of this policy shall include any or all of the defined terms listed below.

3 Discrimination and Harassment

St. Louis College of Pharmacy strives to provide an educational environment free from discrimination based on an individual's membership in a protected group including race, color, religion, national origin, age, sex, gender, gender identity, disability, genetic information, veteran status and sexual orientation. Harassment is a form of discrimination that is strictly prohibited and will not be tolerated. For purposes of this policy, sexual harassment is defined separately.

Discrimination is any act or failure to act that is based upon an individual or group's actual or perceived status (race, color, religion, national or ethnic origin, disability, age, gender, sexual orientation, gender identification, veteran status or other protected class).

Harassment is unwelcome conduct based on actual or perceived status (race, color, religion, national or ethnic origin, disability, age, gender, sexual orientation, gender identification, veteran status or other protected class).

Discriminating or harassing behavior can occur in person, by phone, by publication or through the use of electronic means including internet, email or social media. Examples of behavior that may amount to harassment depending on the severity and persistence include, but are not limited to, the following:

- Using slurs, derogatory or demeaning terms directed at a protected group
- Telling jokes or stories that are derogatory toward members of a particular protected group
- Displaying writings, cartoons, photographs or other derogatory, explicit, suggestive or insulting items directed at a protected group
- Sabotaging, damaging or interfering with the work or education of anyone because of their membership in a particular protected group
- Threatening or intimidating anyone because of their membership in a particular protected group

3.1 Sexual Misconduct

The term "sexual misconduct" includes any or all of the following defined terms: sexual harassment, sexual assault, nonconsensual sexual contact, nonconsensual sexual intercourse and/or sexual exploitation.

3.1.1 Sexual Harassment

Sexual Harassment is unwelcome, gender-based verbal or physical conduct where submission to or rejection of such is made either explicitly or implicitly a term or condition of one's educational or employment program or activities (quid pro quo) or has the purpose/effect of unreasonably interfering with one's work/academic performance or creating an intimidating, hostile or offensive environment (hostile environment). Sexual harassment is contrary to the policies of St. Louis College of Pharmacy as well as state and federal laws.

3.1.2 Sexual Assault

Sexual assault includes nonconsensual sexual contact and nonconsensual intercourse.

3.1.2.1 Non-Consensual Sexual Contact

Nonconsensual sexual contact is defined as any intentional sexual touching, however slight, with any object, by a person upon another person that is without consent and/or by force. Examples include bodily contact with the breasts, buttocks, groin, genitals, mouth or other bodily contact in an area that a reasonable person would associate with a sexual touch. This contact can be perpetrated by a member of the same or opposite sex.

3.1.2.2 Non-Consensual Sexual Intercourse

Nonconsensual sexual intercourse is any sexual penetration or oral copulation, however slight, by a person upon another person that is without consent and/or by force. Sexual penetration includes vaginal or anal penetration by a penis, tongue, finger or object, or oral copulation by mouth or genital contact or genital to mouth contact.

3.1.3 Sexual Exploitation

Sexual exploitation occurs when a person takes nonconsensual or abusive sexual advantage of another for their own advantage or benefit, or to benefit or advantage anyone other than the one being exploited, and that behavior does not otherwise constitute one of the other sexual misconduct offenses. Examples include, but are not limited to, invasion of sexual privacy, prostitution, pimping, pandering, solicitation of a minor, nonconsensual video or audio taping of sexual activity, going beyond the boundaries of consent (such as allowing others to secretly watch you having consensual sex or distributing sexual photographs or video without the person's consent), engaging in voyeurism, knowingly transmitting a sexually transmitted disease or HIV to another person, exposing one's genitals in nonconsensual circumstances, inducing another to expose their genitals and/or administering alcohol or drugs to another person without their knowledge or consent ("date rape" drugs).

3.2 Relationship Violence

St. Louis College of Pharmacy uses the term "relationship violence" to mean domestic violence and dating violence.

3.2.1 Domestic Violence

Domestic violence refers to an act of violence that is a misdemeanor or felony by a current or former spouse, intimate partner, cohabitant or similarly situated person, a person with whom a party shares a child in common or anyone else protected under domestic or family violence law.

3.2.2 Dating Violence

Dating violence is defined as physical violence, or the threat of physical violence, by a person who has been in a romantic or intimate relationship with the party. Whether a relationship exists will depend on the statements of the involved parties as well as the length, type, and frequency of interaction. Dating violence includes, but is not limited to, sexual or physical abuse or the threat of abuse.

3.3 Stalking

Stalking is engaging in a course of conduct directed at a specific person that would cause a reasonable person to a) fear for their safety or the safety of others or b) suffer substantial emotional distress. Stalking can be perpetrated physically or virtually through the internet or other electronic means. Stalking that is not sex or gender based is still a violation of College policy, but is handled through student conduct, faculty or staff complaint and disciplinary procedures.

3.4 Retaliation and Intimidation

It is a violation of policy to retaliate against or intimidate in any way an individual seeking guidance, filing a complaint or taking part in the investigation or any proceeding involving a complaint of prohibited conduct discrimination/harassment, sexual harassment, sexual misconduct, or relationship violence. An individual who retaliates against or intimidates another will be subject to the full range of corrective action, up to and including discharge or expulsion.

4 Consent and Relationships

4.1 Consent

St. Louis College of Pharmacy defines consent to be affirmative consent. This definition provides a higher requirement for consent than some criminal definitions. However, the College believes that this higher standard is appropriate for the personal and professional standards required of all students. Consent to engage in sexual activity must be given knowingly, voluntarily, and affirmatively. Consent requires the presence of a yes, not an absence of a no. Consent may not be inferred from silence, passivity, lack of resistance, or lack of rejection. Consent is demonstrated through clear, unambiguous words (for example, "Yes") and clear, unambiguous actions that demonstrate a willingness to engage freely in sexual activity. Sexual contact or activity without consent is a violation of this policy and, in many instances, a crime.

- Each participant is expected to obtain and give consent to each sexual activity and each sexual encounter. Consent to one form of sexual activity does not imply consent to other forms of sexual activity. Consent cannot be inferred from a current or previous dating or sexual relationship. Past consent does not imply future consent.
- Consent may be withdrawn at any time.
- Silence or absence of resistance does not imply consent.
- An individual who is physically incapacitated from alcohol and/or other drug consumption (voluntarily or involuntarily), or is unconscious, unaware, or otherwise physically helpless is considered unable to give consent. For example, a person who is asleep cannot give consent. Some indicators of incapacitation may include, but are not limited to, lack of control over physical movements, being unaware of circumstances or surroundings, or being unable to communicate for any reason. Consent cannot be forced or coerced through duress or deception. Consent cannot be obtained from a person who lacks the mental capacity to authorize the sexual conduct and when such mental incapacity is known.
- Consent cannot be obtained from a person who is a minor.
- Consent cannot be inferred from an individual's attire, physical appearance, or participation in non-sexual social activity (social media, dating, dancing).
- An individual forced or coerced to participate cannot provide consent. When an individual is intimidated, coerced, threatened – even a perceived threat, isolated or confined, consent cannot be granted.

4.2 Coercion, Intimidation and Force

In some situations, an individual's ability to freely, willingly and knowingly give consent is taken away by another person or circumstance. If force, intimidation and coercion are present there cannot be consent. Examples include, but are not limited to:

- When an individual is physically forced to participate. Force is the use or threat of physical violence and/or imposing on someone physically in order to gain sexual access. There is no requirement that a party resists the sexual advance or request for force to take place, but resistance is a clear demonstration of non-consent.
- When an individual is intimidated or threatened – even a perceived threat – isolated or confined.
- When evaluating coercive behavior, factors such as the frequency, duration, location (isolation of recipient of unwanted contact), and intensity of coercive behaviors will be considered. A person's words or conduct are sufficient to constitute coercion if they significantly impair another individual's freedom of will and ability to choose whether or not to engage in sexual activity.
- Examples include credible threats to release sexual photos, spread inaccurate information, falsely report, physically restrain or restrict access or escape, threats to physically harm self or others, use or threat of a weapon.
- Generally, for those in a relationship requests for specific sexual activity, requests for frequent sexual activity or threats to end a relationship do not constitute coercion, intimidation, or force.

4.3 Consensual Relationships between Staff, Faculty and Students

Consensual sexual or romantic relationships among faculty, staff, and students often create a conflict of interest and have the potential for adverse consequences including potential for sexual harassment or retaliation. This is especially the case in instances where an asymmetry of power occurs (when one person has an employment or academic supervisory role over another person). A consensual relationship between faculty, staff, and students where there is any instructional or administrative relationship is strongly discouraged. Any employee involved in or who commences a consensual relationship with someone over whom he or she has supervisory power (employment or academic) must disclose the existence of the relationship to Human Resources (employment) or the appropriate dean (academic).

5 Section 504 & Title IX Coordinator/Deputy Coordinator for Students

Pursuant to College policy, Section 504 of the Rehabilitation Act of 1973, and Title IX of the Higher Education Amendments of 1972, the College has designated a Section 504 & Title IX coordinator to implement and coordinate this policy. Additionally, the College has designated a deputy Section 504 & Title IX coordinator for students ("deputy coordinator for students") who reports to and assists the Section 504 & Title IX Coordinator to effectively administer this policy for students. If you have questions about the policy, if you believe that you are being harassed or retaliated against in violation of the Retaliation section of this policy, or if you observe someone else being subjected to such conduct, you can report the conduct to the Section 504 & Title IX coordinator. Complaints against students can also be reported to the deputy coordinator for students. The Section 504 & Title IX coordinator or the deputy coordinator for students will oversee the complaint process to enable the College to best assess, respond and investigate complaints to eliminate events, prevent their recurrence and address the effects on the complainant and others. Additionally, the Section 504 & Title IX Coordinator is responsible for coordination and oversight of the administration of this policy including processing and investigation of complaints, disciplinary proceedings and sanctions, reporting, education, and awareness of prohibited conduct and this policy, training of personnel, and conducting an annual review of the effectiveness of the College's prohibited conduct programs.

Contact information for the Section 504 & Title IX coordinator and deputy coordinator for students is listed below:

Section 504 & Title IX Coordinator

Daniel Bauer, PHR
Director, Human Resources
314-446-8308
Jones Hall, Room 1309
Daniel.bauer@stlcop.edu

Deputy Section 504 & Title IX Coordinator for Students

Rebecca Jones
Assistant Vice President, Student Affairs
RAS, Room 410
314-446-8352
Rebecca.Jones@stlcop.edu

6 Educational and Prevention Programs

St. Louis College of Pharmacy engages in comprehensive educational programming to prevent incidents of prohibited conduct. Educational programming consists of primary prevention and awareness programs for all incoming students and new employees as well as ongoing awareness and prevention campaigns for students and faculty that identify and define prohibited conduct, identify and define consent, provide safe and positive options for bystander intervention, provide risk reduction information, and provide information regarding the Clery Act and the Annual Security Report.

The College has developed an annual educational campaign consisting of several media to reach the intended audiences including presentations and distribution of educational materials to new students, presentations during new employee orientation, and annual policy updates for faculty and staff, continuing speaker series, awareness weeks, and web-based training for faculty, staff, and students throughout the school year.

The College recognizes that at times many community members may put themselves in dangerous or risky situations and encourages all community members to offer help and assistance to others in need by taking reasonable and prudent actions to prevent or stop an act of prohibited conduct from occurring.

7 Reporting Complaints and Confidentiality

The College has initiated a complaint procedure designed to encourage any faculty, staff, student or visitor to report any instance of Prohibited Conduct. A complainant does not have to decide whether or not to request criminal reporting, or pursue College conduct processes, to make a complaint.

The College encourages parties who believe they have experienced prohibited conduct to talk to somebody about what happened – so they can get the support they need, and so the College can respond appropriately. Different employees on campus have different abilities to maintain a complainant's confidentiality.

7.1 Reporting Options

7.1.1 Reporting to "Responsible Parties"

A "responsible employee" is a College employee who has the authority to redress prohibited conduct, who has the duty to report incidents of prohibited conduct or other student misconduct (see Section 11 titled "Clery Requirements, Timely Warning and/or Emergency Notification"), or who a student could reasonably believe has this authority or duty (i.e. coaches, athletic directors, residence assistants, residence life staff, student activities staff, advisors to student organizations, faculty, administrators). The College has designated all employees, other than those employed as a professional counselor, as a responsible employee under this policy. A report to a responsible employee is considered a report to the College.

When a party tells a responsible employee about an incident of prohibited conduct, the College will take immediate and appropriate steps to investigate what happened and to resolve the matter promptly and equitably.

A responsible employee must report to the Section 504 & Title IX coordinator/deputy coordinator for students all relevant details about the alleged prohibited conduct shared by the party and that the College will need to determine what happened – including the names of the party's alleged perpetrator(s), any witnesses, and any other relevant facts, including the date, time, and specific location of the alleged incident.

To the extent possible, information reported to a responsible employee will be shared only with people responsible for handling the College's response to the report except for instances of mandated reporting in Missouri, such as professionals reporting suspected child abuse or neglect.

Before a party reveals any information to a responsible employee, the employee should ensure that the party understands the employee's reporting obligations and, if the parties wants to maintain confidentiality, direct the party to confidential resources.

If the party wants to tell the responsible employee what happened but also maintain confidentiality, the employee should tell the party that the College will consider the request, but cannot guarantee that the College will be able to honor it. In reporting the details of the incident to the Section 504 & Title IX coordinator/deputy coordinator for students, the responsible employee will also inform them of the party's request for confidentiality.

Responsible employees will not pressure a party to request confidentiality, but will honor and support the party's wishes, including for the College to fully investigate an incident. Similarly, responsible employees will not pressure a party to make a full report if the party is not ready to do so.

All faculty and staff, whether they are full-time or part-time, are responsible for supporting and assisting in the administration of this policy. Public Safety staff and any employee, with the exception of a professional counselor, is required to immediately contact the Section 504 & Title IX coordinator/deputy coordinator for students if prohibited conduct is reported to them or they become aware of information indicating that such conduct has occurred.

7.1.2 Reports to Public Safety

Public Safety is available 24 hours a day, seven days a week. Officers can be reached by calling 314.446.SAFE (7233) or by visiting the Public Safety office in the STLCOP garage. Public Safety can assist with immediate health and safety needs and provide notice to the College's Title IX coordinators.

7.1.3 Anonymous Reporting

The College encourages parties who believe they experience prohibited conduct covered under this policy to talk to someone. Currently the College does not provide an online form for anonymous reporting, but a person may contact Public Safety at 314.446.SAFE (7233) or security@stlcop.edu 24 hours a day, seven days a week to report an incident.

7.1.4 Reports to Confidential Counselors

Professional, licensed counselors and pastoral counselors who provide mental-health counseling to members of the College community (including those who act in that role under the supervision of a licensed counselor) are generally not required to report any information about an incident to College personnel without a reporting party's permission.

Students: Counselors in the Student Counseling Center in the Residence and Student Center (RAS) are examples of professional counselors. During business hours, students may contact the Counseling Center staff on the fourth floor of the RAS or at 314.446.8338 or email at any time at counselingcenter@stlcop.edu.

Faculty and staff can contact Employee Assistance Program H&H Health Services at 314.845.8302 or 800.832.8302.

7.1.4.1 Off-campus Counselors and Advocates

Off-campus counselors, advocates, and health care providers will also generally maintain confidentiality and not share information with the College unless the complainant requests the disclosure and signs a consent or waiver form. Confidentiality is maintained as long as it is within the limits of the law (i.e. no harm to self, others, and no current abuse of a child or other vulnerable persons).

7.2 Requesting Confidentiality from the College

7.2.1 How the College Will Weigh the Request for Confidentiality and Respond

If a complainant discloses an incident to a responsible employee but wishes to maintain confidentiality or requests that no investigation into a particular incident be conducted or disciplinary action taken, the College must weigh that request against the College's obligation to provide a safe, non-discriminatory environment for all students, faculty, staff and visitors, including the reporting party.

If the College honors the request for confidentiality, a reporting party must understand that the College's ability to meaningfully investigate the incident and pursue disciplinary action against the alleged perpetrator(s) may be limited.

The College has designated the following individual(s) to evaluate requests for confidentiality once a responsible employee is on notice of an incident of alleged prohibited conduct:

- Section 504 & Title IX Coordinator
- Deputy Coordinator for Students
- Title IX Investigators

When weighing a reporting party's request for confidentiality or that no investigation or discipline be pursued, the Title IX coordinator/ deputy coordinator for students and appropriate College officials will consider a range of factors, including the following:

- If there have been multiple complaints about the same alleged perpetrator the College will initiate an investigation.
- The legal obligations of the College
- The increased risk that the respondent will commit additional acts of Prohibited Conduct or other violence, such as:
 - # Whether the respondent has a history of arrests or records from a prior institution indicating a history of violence
 - # Whether the respondent threatened further Prohibited Conduct or other violence against the reporting party or others
 - # Whether the Prohibited Conduct was committed by multiple perpetrators
- Whether the Prohibited Conduct was perpetrated with a weapon
- Whether the party receiving the prohibited behavior is a minor
- Whether the College possesses other means to obtain relevant evidence of the incident (e.g., security cameras or personnel, physical evidence)
- Whether the party receiving the alleged prohibited behavior's report reveals a pattern (e.g., illicit use of drugs or alcohol) at a given location or by a particular group

The presence of one or more of these factors could lead the College to investigate and, if appropriate, pursue disciplinary action. If none of these factors is present, the College will likely respect the party receiving the alleged prohibited behavior's request for confidentiality.

Even if the request for confidentiality is granted, the College may take steps to limit the effects of the alleged misconduct and prevent its recurrence without initiating a formal action against the alleged perpetrator or revealing the identity of the student. This may include increased monitoring, security or additional training or communication efforts for students or employees.

7.2.2 If the College determines that it can respect a complainant's request for confidentiality

If the College determines that it can respect a complainant's request for confidentiality, the College will also take immediate action as necessary to protect and assist the complainant.

7.2.3 If the College determines that it cannot respect a complainant's request for confidentiality

The College will inform the complainant prior to starting an investigation and will, to the extent possible, only share information with people responsible for handling the College's response.

The College will remain mindful of the complainant's well-being, and will take ongoing steps to protect the complainant from retaliation or harm and work with the complainant to create a safety plan. Retaliation against the complainant, whether by students or College employees, will not be tolerated.

The College will also:

- Assist the complainant in accessing other available complainant advocacy, academic support, counseling, disability, health or mental health services, visa and immigration assistance, and legal assistance both on and off campus (see portion of policy identifying these)
- Provide other security and support, which could include issuing a no-contact order, helping arrange a change of living or working arrangements or course schedules (including for the alleged perpetrator pending the outcome of an investigation) or adjustments for assignments or tests
- Inform the complainant of the right to report a crime to local law enforcement and provide the complainant with assistance if the complainant wishes to do so.

The College may not require a complainant to participate in any investigation or disciplinary proceeding.

Because the College is under a continuing obligation to address the issue of prohibited conduct campus-wide, reports of prohibited conduct (including non-identifying reports) will also prompt the College to consider broader remedial action such as increased monitoring, supervision or security at locations where the reported prohibited conduct occurred, increasing education and prevention efforts including to targeted groups, conducting climate assessments/victimization surveys, and/or revisiting its policies and practices.

7.3 Timing of Reports

There is no limit on the amount of time that a complainant may have to file a report. However, the greater the time between the date the incident occurred and date a complaint is filed impacts an investigation. Time may limit the availability of parties involved, witnesses and evidence. The College will make a reasonable attempt to investigate complaints that occurred in the past and will adjudicate based on the information that is available.

8 Interim Supportive Measures

Upon receipt of a report, the complainant or respondent may request or the College may impose reasonable and appropriate interim measures to ensure the educational opportunity and/or safety of all parties, the College community, and/or the integrity of the process. The Section 504 & Title IX coordinator/deputy coordinator will consider interim supportive measures for students and appropriate administrators (Public Safety, Student Affairs for students, Human Resources for staff, and appropriate dean for faculty) such that they support continued access to education programs/activities without unreasonably burdening the other party.

Potential interim measures include:

- A College “no contact” order
- Access to counseling services and assistance in setting up the initial appointment
- Rescheduling of exams and assignments
- Change in class schedule or transferring section including late withdrawal from a class without penalty
- A change in College employment related work schedule or job assignment
- Change in Residence Hall assignment
- Providing an escort to ensure safe movement between classes and activities
- Academic support such as tutoring
- Leave of absence
- Information and assistance with filing an order of protection with the St. Louis City Circuit Court (Civil Courts Building, 9th Floor, Adult Abuse Office, 10 N. Tucker, St. Louis, MO) or other appropriate jurisdiction. Note that the College does not serve as an advocate or representative of the party in this process.

9 Immediate Assistance as a Result of Prohibited Conduct

If you are in need of immediate assistance as a result of sexual misconduct, sexual exploitation, relationship violence, stalking, or any incident involving violence, threat of violence or fear for your safety, please contact the Office of Public Safety by calling **314.446.SAFE (7233)** and/or the St. Louis Metropolitan Police Department at 314.444.5385 for immediate assistance. All non-urgent incidents of prohibited conduct can be directly reported to the Section 504 & Title IX coordinator or deputy coordinator for students.

Upon receipt of a report of sexual misconduct, relationship violence, stalking or any incident involving a threat or act of violence, the College’s priority is to address the safety of the complainant. If the complainant is uncomfortable contacting the Office of Public Safety or the St. Louis Metropolitan Police Department, he/she can notify a staff member of Student Affairs such as Residential Life or Counseling Center for assistance. Student Affairs or College Title IX personnel will communicate with Public Safety to ensure proper tracking of reports. The College will assist the complainant in notifying the appropriate law enforcement authorities upon request. Students, faculty, or staff who are recipients of prohibited conduct will receive information regarding counseling opportunities on and off campus.

Complainants are strongly encouraged to report incidents to the Office of Public Safety and/or St. Louis Metropolitan Police Department, even if the complainant does not want to press charges at the time of the incident. This will allow the authorities to gather important evidence should the complainant later change their mind. The complainant may choose to pursue the matter through the criminal justice system and/or the College conduct/discipline system.

The Office of Public Safety will help the complainant get to a safe place and assist them in seeking medical treatment at an off campus medical center. In instances of sexual assault complainants should make every effort to save anything that might contain the perpetrator’s DNA, therefore a complainant should not bathe or shower, use the restroom, change clothes, comb hair, clean up the crime scene, or move anything that may have been touched. Evidence may be obtained from the medical evaluation to assist prosecution for purposes of a criminal trial. A complainant does not have to give their name to receive the exam. A complainant may also want to keep a journal to record detailed information about the incident.

10 Coordination with Law Enforcement

St. Louis College of Pharmacy encourages complainants to pursue criminal action for incidents of prohibited conduct that may also be crimes under Missouri or federal law. The College will also assist complainants in making a criminal report and will cooperate with law enforcement agencies to pursue the criminal process to the extent permitted by law.

The College’s policies, definitions and burden of proof may differ from Missouri and federal law. A complainant may seek resolution through the College’s complaint process, may pursue criminal action, may choose one but not the other, or may choose both. Law enforcement’s determination whether or not to prosecute, or the outcome of any criminal prosecution, are not determinative of whether a violation of the College’s policies has occurred. Whenever possible the College will not wait for the conclusion of a criminal investigation or proceeding to investigate and process a complaint of prohibited conduct.

11 Clery Requirements, Timely Warning and/or Emergency Notification

Certain campus officials, known as campus security authorities (CSAs), have a duty under the Clery Act to compile and publish an annual report reflecting statistical information regarding forcible sex offenses (rape, sodomy, sexual assault with an object, fondling), non-forcible sex offenses (incest, statutory rape), dating violence, domestic violence, and stalking, as defined by this policy and applicable federal law. All personally identifiable information is kept confidential, but statistical information must be passed along to campus security regarding the type of incident and its general location (on or off-campus, in the surrounding area, but no addresses are given) for publication in the College’s Annual Security Report. The information to be shared includes the date, the location of the incident (using Clery location categories) and the Clery crime category. The Office of Public Safety must record this same information in a campus crime log, which is available for public inspection. College administrators must issue immediate timely warnings for incidents reported to them that are confirmed to pose a substantial threat of bodily harm or danger to members of the campus community. The College will make every effort to ensure that a complainant’s name and other identifying information is not disclosed, while still providing enough information for community members to make safety decisions in light of the danger.

12 Amnesty for other less serious policy violations

St. Louis College of Pharmacy believes violations of this policy to be very serious offenses. The College will generally offer any student, whether the complainant or a third party, who reports violations of this policy limited immunity from being charged for policy violations related to alcohol use and/or drug use, provided that such violation(s) did not and do not place the health and safety of any person at risk. The College may choose, however, to pursue educational interventions with those individuals.

13 False Reports

Due to the seriousness of these matters, an individual who knowingly alleges a false claim against another will be subject to the full range of corrective action, up to and including termination or expulsion. In the event that a cross complaint's allegations are deemed to be unfounded, the cross complaint will be treated as a false report.

14 Cross Complaints

A cross complaint occurs when a respondent files a complaint against the original complainant. Each complaint will be evaluated on its own merits. Complaints that are determined to be false and/or retaliatory will be treated as False Reports or Retaliation under this policy.

The following is an example of a cross complaint: An individual files a complaint against their partner for dating violence. The other individual in the relationship also files a complaint of dating violence. Both individuals involved are both complainant and respondent in separate complaints against each other.

15 Conflict of Interest

Should a complainant or respondent feel there is a conflict of interest in any step of the complaint, investigation, or adjudication process, with the Section 504 & Title IX Coordinator, Deputy Title IX Coordinator for Students, assigned Title IX investigators, or appropriate administrator for conduct/disciplinary proceedings, written notice describing the potential conflict and its impact must be submitted as soon as a conflict is recognized.

The conflict report will be submitted to both the Section 504 & Title IX Coordinator or Deputy Coordinator for Students and the appropriate administrator:

- For students it is the student conduct administrator
- For faculty it is the faculty person's dean
- For staff it is employee's President's Staff person

A three-person conflict review panel, including at least one administrator and at least one trained Title IX investigator not involved in the complaint, will review the potential conflict and determine if conflict is substantial enough to make the procedures unfairly favor one party.

If substantial conflict is determined, the conflict review panel will assign an alternative coordinator, investigator, or administrator. If it is determined there is insufficient evidence for significant conflict the parties will be notified.

The determination will be shared with the Section 504 & Title IX coordinator/deputy coordinator for students, complainant, and respondent in writing within ten (10) days of receipt.

16 Written Explanation of Rights

Regardless of whether a complainant elects to pursue a criminal complaint or pursue a College investigation, the College will assist complainants by providing them with a written explanation of rights. Should a party be named as respondent and a claim is investigated, the respondent will also receive a written explanation of rights.

17 Resources

17.1 Campus and Community Resources

A number of campus and community resources are available to assist parties with Prohibited Conduct issues. A list of resources will be provided to a complainant upon receipt of a complaint. A list is also included as Appendix I to this policy.

17.2 Advisor in the Process

Both the Complainant and Respondent have the right to be assisted by an advisor provided by the College, or an advisor of their choice, present at any meeting related to the investigation or disciplinary proceeding. Parties have the right to have a private attorney serve as their advisor, at their own expense, regarding a complaint. The College has the right at all times to determine what constitutes appropriate behavior on the part of an advisor. The advisor may not be a fact witness or otherwise have any conflicting role in the process.

An advisor provided by the College will be trained about College policies, procedures, and resources. Any person who serves as an advisor should plan to make themselves available for meetings throughout the investigative or disciplinary process. Advisors may participate in College processes in an advisory capacity, but they may not take part directly in the investigation, meeting with the disciplinary panels, or appeal. If a party wishes to speak privately with their advisor during the investigation, meeting, hearing, or appeal, they may request a brief recess from the meeting or proceeding.

18 Sanctions/Discipline for Policy Violations

The administrator responsible for disciplinary proceedings will determine the appropriate sanction or disciplinary action based on the seriousness of the violations, the respective ages and positions of the complainant and the respondent, and whether there have been other complaints against the respondent. Note that while investigation records are private, sanctions become part of student records or personnel files. Any investigation, hearing, review, or appeal procedure will use a preponderance of the evidence standard of proof (i.e. more likely than not).

- For faculty disciplinary process and sanctions will be determined based on established guidelines in the Faculty Handbooks, Faculty Bylaws, and College's employment policies. Disciplinary action for offenses could include mandated counseling, written warning, suspension and/or termination. The appropriate dean is responsible for the disciplinary proceedings involving faculty. Human Resources staff are available to assist.
- For staff discipline will be determined based on established guidelines in the Staff Handbook and College's employment policies. Disciplinary action for offenses could include mandated counseling, written warning, suspension, and/or termination. Human Resources is responsible for overseeing disciplinary proceedings involving staff members, with the appropriate vice president/dean of the unit being responsible for discipline decisions.
- Student Affairs handles non-academic disciplinary proceedings involving students. Student sanctions will be determined based on established guidelines in the Code of Non-Academic Student Conduct. Disciplinary action for offenses may include, but are not limited to, formal warning, non-academic disciplinary probation, mandated counseling assessment, denial of the right to hold an office in a student organization or to participate in College-sponsored extracurricular activities, campus restrictions, and/or other educational sanctions and non-academic suspension or dismissal from the College.
- If the offender is neither a student nor faculty or a staff member and thus not subject to the College's direct control, the College will take such measures, as it deems appropriate, to remedy the matter. This may include barring the offender from College property, and/or filing a complaint with an employer, professional association, or law enforcement authorities.

19 General Information Regarding Complaints and Investigations

19.1 Fairness in the Process for Complainants and Respondents

- The College's processes provide a prompt, fair, and impartial process to afford the complainant and respondent the same opportunities to due process.
 - # The complainant and the respondent will be provided timely and equal access to any information that will be used during investigations, informal and formal disciplinary meetings and hearings subject to the privacy requirements under the Family Educational Rights and Privacy Act ("FERPA").
 - # Both parties have the opportunity to be advised as described in the resources section of this policy.
 - # The complainant and respondent will be notified simultaneously in writing of the results of any disciplinary proceedings, as well as any changes to those results or sanctions/disciplinary actions prior to the time that such results become final.
 - # The complainant and the respondent each have the right to appeal the results of any disciplinary hearing/determination and will be notified simultaneously in writing of the final outcome after the appeal is resolved.
- The College approaches these matters impartially and seeks to determine the facts and weighs those facts and evidence against the appropriate standards of evidence to determine violations of policy.
- The respondent is not presumed to have committed a violation until a determination is made at the conclusion of the grievance process.
- To allow both parties sufficient time to prepare for interviews, meetings, and disciplinary proceedings, the complainant and respondent will be given notice prior to the event. Relevant details needed by the parties to properly prepare will be shared including the identities of parties involved, specific policy violation being reviewed, precise conduct reported, date(s) and time(s) of conduct reported.

19.2 Training

- Section 504 & Title IX coordinator/deputy coordinator, investigators, appropriate administrators and individuals involved in conduct proceedings will receive annual training on issues related to prohibited conduct as defined in this policy.
- Section 504 & Title IX coordinator/deputy coordinator and investigators are trained on how to conduct an investigation that protects the rights of the complainant and respondent and promotes accountability.

19.3 Timeliness

- The College believes that timing of processes should be balanced with thoroughness to ensure the process is both prompt and fair.
- The College lays out specific timelines within its procedures and will make reasonable efforts to follow these established timelines. The timelines specified may be delayed due to a number of factors including the academic calendar (fall/winter/spring break, College holidays), and the availability of parties, e.g. medical leave. In instances where a complainant or respondent are unwilling or unable to meet in the timeframe, procedures will proceed accordingly with the information available at that time. The Section 504 Title IX Coordinator/Deputy Coordinator are responsible for updating the parties with regard to timing issues including delays.
- The College may extend the timeframes provided in this policy for good cause with written notice to the complainant and respondent of the delay and the reason for the delay.

19.4 Records

Records of complaints, investigations, determinations, disciplinary sanctions, remedies, appeal, or any informal resolution, and all materials used to train investigators, coordinators, hearing panel members, etc. covered by this policy will be retained for three years. Conduct records will be kept in accordance with the College Record Retention Policy for student records and employment records.

20 Procedure for Receiving, Investigating and Adjudicating Complaints

Procedures for receiving, investigating, and adjudicating complaints related to discrimination, harassment, sexual misconduct, relationship violence, and stalking vary slightly depending on whether the complainant is a student, faculty, staff member, or other (guests, contractors, and visitors).

20.1 Notice of Complaint to the College

Notice of a complaint from a typically occurs in one of the following ways:

- Section 504 & Title IX coordinator/deputy coordinator for students directly receives notice from a complainant.
- A responsible employee who becomes aware of a complaint covered under this policy immediately refers the matter to the Section 504 & Title IX coordinator or Section 504 & Title IX coordinator deputy coordinator for students. This includes student conduct administrators who receive notice of a complaint. A responsible employee must report to the Section 504 & Title IX coordinator/deputy coordinator for students all relevant details about the alleged prohibited conduct shared by the party including the names of the party's alleged perpetrator(s), any witnesses, and any other relevant facts, including the date, time, and specific location of the alleged incident.
- Public Safety staff become aware of a complaint and shares the complaint with the Section 504 & Title IX coordinator/deputy coordinator for students, after assessing the need for immediate assistance as explained in the section "Immediate Assistance as a Result of Prohibited Conduct"

20.2 Preliminary Evaluation of the Complaint/Conference with Complainant

The Section 504 & Title IX coordinator/deputy coordinator for students or designee, such as the Student conduct administrator or trained Title IX investigator, will

- Inform the complainant that the complaint has been received
- Share a written explanation of rights and resources including community resources and interim support measures
- Review the complaint and determine if the complaint alleges any facts that, if true, would indicate prohibited conduct occurred.

This review will include:

- An examination of the complaint as received (either in writing, in-person, over the phone, or other communications),
- Evidence provided and other information related to the parties involved such as review of related prior complaints, disciplinary action, or sanctions. Additionally, a review of Title IX records will be included to see if complainant, respondent, or witnesses have been involved in other incidents.
- Assess immediate safety needs of the complainant and the need for timely warning/emergency notification. Update Public Safety if timely warning/emergency notification is necessary.
- Evaluation of possible or requested interim support measures, and/or conduct or disciplinary hearings.
- In most instances, the complainant will be contacted to provide additional information.

20.2.1 Determination that Complaint is NOT Covered by this Policy

If, after preliminary evaluation of the complaint, it is determined that the complaint fails to support a violation of this policy the Section 504 & Title IX coordinator/deputy coordinator for students or designee will notify the complainant that the complaint fails to state a violation under this policy. The complainant will be notified within five (5) business days of the complaint being received.

20.2.2 Determination that Complaint IS Covered by this Policy

If the complaint presents sufficient evidence to support a possible policy violation the Section 504 & Title IX coordinator/deputy coordinator for students or designee will notify the complainant in writing within five (5) business days of the following:

- The preliminary review of the complaint alleges sufficient evidence to support a possible violation under the policy.
- Need to meet with the complainant for more information, if necessary.
- Options for the complainant including:
 - # Right to pursue an investigation into the complaint leading to a conduct proceeding (code of non-academic student conduct for student conduct issues, faculty bylaws and handbook for faculty, and staff handbook for employees), or right to request that the complaint remain confidential if the complainant has not already requested confidentiality. If the College has made a determination as to whether or not the complaint can remain confidential, it will notify the complainant of its decision as described in the section "Requesting Confidentiality from the College".
 - # Option to request Informal Administrative Resolution in lieu of a full investigation and conduct process, if applicable.
 - # Right to contact law enforcement
- Notice of interim support measures in place, if any, and the option to request interim support measures.
- Right to have an advisor in the process
- Timeframe to hear back from the complainant for a decision to pursue an investigation, if applicable.

20.3 Notice of Charges

Should the complainant choose to pursue the complaint (or the College determines it cannot maintain confidentiality as outlined in the section "How the College Will Weigh the Request for Confidentiality and Respond", the Section 504 & Title IX coordinator/deputy coordinator for students or designee will notify the appropriate administrator of the charge. The appropriate administrator is dependent on the respondent of the complaint:

- For students it is the student conduct administrator

- For faculty it is the faculty person's dean
- For staff it is employee's respective president's staff person. Human Resources will also be notified.

The Section 504 & Title IX coordinator/deputy coordinator for students or designee will notify the respondent in writing within five (5) business days of the following:

- Specific policy(s) violation(s) being charged, including the identities of the parties involved, specific policy provisions, precise conduct alleged, date and location of the conduct.
- Request to meet to have a preliminary conference to review the charges and submit information related to the complaint. The date, time, location, and purpose of the meeting will be shared and sufficient time granted to prepare for the meeting.
- If informal resolution was requested by complainant and an option.
- Possible need to do a full investigation.
- Written explanation of rights and resources, including right to an advisor.
- Notice of interim support measures in place that impact the respondent, if any, and the option for the respondent to request interim support measures.
- Remind parties that a respondent is not presumed responsible because of a charge.

Simultaneously, the complainant will be notified in writing that the respondent has been notified of the charge as well as other information shared with the respondent.

20.4 Preliminary Conference with Respondent

In response to a charge, the respondent will be provided an opportunity to meet with the Section 504 & Title IX coordinator/deputy coordinator or designee and provide information and evidence. This meeting will occur within ten (10) business days of notice of charges to the respondent.

The respondent has the option to:

- Accept responsibility for the charge(s). If the respondent accepts responsibility, Section 504 & Title IX coordinator/deputy coordinator or designee will coordinate with the appropriate administrator to deliver disciplinary outcomes to the respondent.
- If the respondent does not accept responsibility for the charge(s),
 - # a formal investigation will ensue, unless
 - # an informal administrative resolution is appropriate and both parties agree to it.

The complainant and respondent will be simultaneously notified in writing within five (5) business days of the outcome: accepting responsibility, informal administrative resolution, or formal investigation.

20.5 Opportunity for Informal Administrative Resolution

In some cases, it may be possible to utilize informal administrative resolution strategies to facilitate resolution and disposition of a charge by mutual consent of the parties at any step of the process without a formal investigation.

The appropriate administrator, Section 504 & Title IX coordinator/deputy coordinator or designee will meet with the parties and present the information gathered to this point, describe sanctions if the respondent is found responsible, and allow each party to respond.

The complainant and respondent will not be involved in direct, in-person meetings with each other, unless mutually agreed upon by the complainant and respondent and the appropriate administrator and the policy violation in question is one other than sexual assault or relationship violence.

The Section 504 & Title IX coordinator/deputy coordinator for students will serve as a resource to the appropriate administrator or designee to ensure that any sanctions or discipline and remedies will adequately address the harm to the complainant, educate the respondent, and prevent the recurrence of future violations. Additionally, the Section 504 & Title IX coordinator/deputy coordinator for students will coordinate additional actions to address the impact of a policy violation on others such as, but not limited to, counseling and awareness training or programs.

The appropriate administrator will make a determination of responsibility for the policy violations covered in the complaint and simultaneously notify both writing within five (5) business days of the outcome.

20.6 Investigation

The Section 504 & Title IX coordinator/deputy Title IX coordinator for students, or trained investigators whom they select for a particular case, are responsible for investigating complaints of prohibited conduct and gathering evidence. The parties directly involved in the investigation will be informed in a timely manner regarding the process and progress of the investigation. The complainant and respondent will be notified in advance of their requested participation in an investigator interview to allow adequate time to prepare. During the investigation period, the investigator will gather information, evidence, and interview witnesses. Questioning or evidence about a complainant's prior sexual history will not be considered by the investigator except where the complainant and respondent have a prior intimate or sexual relationship that may be deemed relevant to a determination of consent. The investigator will gather facts, including an assessment of credibility, triangulation of witness/evidence and corroboration assessment, and other information.

Section 504 & Title IX coordinator/deputy Title IX coordinator for students, or trained investigators, will create a report that will include information on the specific complaint, relevant policies, timeline, involved parties, interview summaries, evidence gathered, and findings of fact and analysis. However, the report does not determine a disciplinary outcome.

A confidential file of the investigation including personal notes, all evidence gathered, and other information will be kept on file with the Section 504 & Title IX coordinator/deputy coordinator for students.

The investigation report will be presented to the appropriate administrator for preliminary review. The Section 504 & Title IX Coordinator will also simultaneously notify the complainant and respondent within five business days (5) of the close of the investigation. The complainant and respondent may respond within five (5) business days in writing to the Section 504 & Title IX coordinator and present comments on the report.

This process will normally not exceed (60) sixty calendar days from the investigation start date except in rare circumstances.

The complainant or respondent may again pursue informal administrative resolution as described above with the appropriate administrator.

20.7 Formal Conduct/Disciplinary Proceedings and Appeals

After the investigation report comment period, the appropriate administrator (dean for faculty, student conduct administrator for students, or President's Staff person for staff) will follow the appropriate conduct process for the respondent named in the complaint. The complainant and respondent will be notified in advance to the proceedings to allow time to prepare.

The following modifications will be applied evenly to both the respondent and complainant:

- Prior to the hearing/disciplinary proceedings, the administrator/hearing panel will establish guidelines and timeframes for parties submitting evidence and calling witnesses. The complainant and respondent will be notified of these guidelines and timeframes by the administrator/hearing panel.
- Prior to the hearing/disciplinary proceedings, the administrator/hearing panel may present guidelines for cross-examination, including limitations that prevent the respondent from personally cross-examining the complainant (use of closed circuit video, require questions be submitted in advance, etc.).
- Any investigation, hearing, review, or appeal procedure will use a preponderance of the evidence standard of proof (i.e. more likely than not).

20.7.1 Faculty

20.7.1.1 Disciplinary Proceedings

- For faculty discipline the process will be determined based on established guidelines in the Faculty Handbooks, Faculty Bylaws, and College's employment policies.
- If the proceeding determines that a violation of policy has occurred, prompt and appropriate sanctions/corrective action will be taken as deemed appropriate by the College.
- Both parties will be simultaneously notified within three (3) business days of the result and their rights to appeal. This notice will identify the terms of appeal, identify the policies and sections violated, a detailed procedural history of the process from the receipt of the complaint through the hearing, the methods used to gather evidence, findings of fact that support the determination, conclusion (application of policy to the facts) including the determination of responsibility, and sanctions/remedies.

20.7.1.2 Appeal Process

Faculty are entitled to an appeal process as outlined in Faculty Handbook, Bylaws, and College's employment policies.

If no appeal process in the bylaws otherwise applies, the faculty member will be entitled to the following appeal process for violations of this policy.

- Either party may file an appeal within three (3) business days of the delivery of the hearing determination letter.
- The appeal must be submitted in writing to the appropriate dean and must specifically state the reason for appeal. Appeals are limited to the following grounds:
 - A procedural error occurred that significantly impacted the outcome of the hearing (e.g. substantial and material deviation from established procedures, etc.)
 - To consider new evidence unavailable during the original hearing or investigation through no fault or lack of diligence by a party, which could substantially and materially impact the original finding or sanction. A summary of this new evidence and its potential impact must be included along with an explanation showing why the evidence was not presented at the original hearing
 - The sanctions imposed are substantially disproportionate to the severity of the violation and substantially outside the parameters or guidelines set by the College for this type of offense or the cumulative conduct record of the respondent.
- The president will select an appeal review board consisting of three members, male and female, to hear the case. These three persons will be selected from various constituencies of the College (students, staff and/or faculty) but include at least one faculty member. Selection will be made in such a way as to ensure appropriate representation on the appeal review board, that the members are trained appropriately and that there are no foreseeable conflicts of interest. It may examine all documentation and evidence relating to the case; and it may elect to call additional witnesses in the case. The responsibility of the appeal review board is to conduct a closed and confidential hearing and advise the president of its findings. The president will make a determination based on the report of the appeal review board and has ultimate authority in all decisions and recommendations. The determination of the president is considered final and not appealable. Both parties will be informed of the final outcome and results of the appeal.

20.7.2 Staff

20.7.2.1 Disciplinary Proceedings

- For staff discipline, the process will be based on established guidelines in the Staff Handbook and College’s employment policies. Human Resources is responsible for overseeing disciplinary proceedings involving staff members, with the appropriate vice president/dean of the unit being responsible for discipline decisions.
- If the proceeding determines that a violation of policy has occurred, prompt and appropriate sanctions/corrective action will be taken as deemed appropriate by the College.
- Both parties will be simultaneously notified within three (3) business days of the result and their right to appeal. This notice will identify the terms of appeal, identify the policies and sections violated, a detailed procedural history of the process from the receipt of the complaint through the hearing, the methods used to gather evidence, findings of fact that support the determination, conclusion (application of policy to the facts) including the determination of responsibility, and sanctions/remedies.

20.7.2.2 Appeal Process

Staff are entitled to the appeal process as outlined in Staff Handbook and College’s employment policies.

If no appeal process in the staff handbook otherwise applies the staff member shall be entitled to the following appeal process for violations of this policy.

- Either party may file an appeal within three (3) business days of the delivery of the hearing determination letter.
- The appeal must be submitted in writing to the appropriate dean and must specifically state the reason for appeal. Appeals are limited to the following grounds:
 - # A procedural error occurred that significantly impacted the outcome of the hearing (e.g. substantial and material deviation from established procedures, etc.)
 - # To consider new evidence, unavailable during the original hearing or investigation through no fault or lack of diligence by a party, which could substantially and materially impact the original finding or sanction. A summary of this new evidence and its potential impact must be included along with an explanation showing why the evidence was not presented at the original hearing
 - # The sanctions imposed are substantially disproportionate to the severity of the violation and substantially outside the parameters or guidelines set by the College for this type of offense or the cumulative conduct record of the respondent.
- The president will select an appeal review board consisting of three members, male and female, to hear the case. These three persons will be selected from various constituencies of the College (students, staff and/or faculty) but include at least one staff member. Selection will be made in such a way as to ensure appropriate representation on the appeal review board, that the members are trained appropriately and that there are no foreseeable conflicts of interest. It may examine all documentation and evidence relating to the case; and it may elect to call additional witnesses in the case. The responsibility of the appeal review board is to conduct a closed and confidential hearing and advise the president of its findings. The president will make a determination based on the report of the appeal review board and has ultimate authority in all decisions and recommendations. The determination of the president is considered final and not appealable. Both parties will be informed of the final outcome and results of the appeal.

20.7.3 Students

20.7.3.1 Disciplinary Process

Student Affairs handles non-academic disciplinary proceedings involving students. Student sanctions and processes for hearings will be determined based on established guidelines in the Code of Non-Academic Student Conduct.

20.7.3.2 Appeal

Students are entitled to the appeal process as outlined in Code of Non-Academic Student Conduct.

20.8 Notice of Outcome and Results

Whenever a complaint is resolved at any level in the process provided under this policy: the College will inform the complainant in writing regarding whether or not it found that a violation of policy occurred, any individual remedies offered or provided to the complainant, any sanctions imposed against the respondent that directly relate to the complainant, and other steps the school has taken to eliminate and prevent the recurrence of a hostile environment, if any, is found to exist by the College. The respondent will not be notified of any individual remedies offered or provided to the complainant. In cases that involve a complaint of dating violence, domestic violence, stalking, sexual assault, or a forcible sex offense (rape, sodomy, sexual assault with an object, fondling) or non-forcible sex offense (incest, statutory rape), the College will inform the complainant and respondent of the result of the proceeding, any sanctions that are imposed on the respondent, and the rationale for the result and the sanctions consistent with its obligations under the Clery Act and the Violence Against Women Act of 2013. All notices will be simultaneously provided to the complainant and respondent within the time frame specified in this policy.

Responsibilities:

Position/Office/Department	Responsibility
Vice President, Student Affairs	Designates appropriate administrator for student non-academic conduct proceedings

Dean of Pharmacy	Oversee faculty disciplinary proceedings for School of Pharmacy faculty
Dean of Arts & Science	Faculty sanctions for policy violations for School of Arts & Sciences faculty
Human Resources	Oversee staff disciplinary proceedings for policy violations
Section 504 & Title IX Coordinator/Deputy Coordinator for Students	Oversight for policy maintenance, complaint receipt, investigations and appeals process.

Policy Contacts:

<u>Name</u>	<u>Contact Information</u>
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