

Valor Christian College 2018 Annual Security Report

(Posted October 1, 2018 for reporting years 2015-2017)

The Clery Act requires most colleges and universities including Valor Christian College (VCC) to publish an annual report on safety and security issues. This report contains statistics for the previous three years of reported crimes that occurred on College property owned or controlled by VCC and on public property immediately adjacent to and accessible from the campus. The report also includes institutional policies concerning campus safety and security, such as the policies concerning alcohol and drug use, crime prevention, the reporting of crimes, and sexual assault policies, which assure basic victims' rights and explain where students should go to report crimes. As indicated by the statistics for the College campus, Valor Christian College is an exceptionally safe environment for both students and employees. Maintaining this positive trend is a continuing high priority for the College.

IMPORTANT PHONE NUMBERS

Emergency number operates 24-hours-a-day

Campus Safety & Security Office, 8 a.m. to 5 p.m., Monday through Friday

For assistance from Campus Safety & Security personnel on campus: (614) 382-1159

For emergencies requiring police, ambulance, and/or fire department: 911

TIPS FOR A SAFE CAMPUS

While the safety policies and procedures at Valor Christian College are designed for your safety and welfare, you help to maintain your own safety both on and off campus by following all safety and security policies and by using common sense safety practices, such as:

- Walking and jogging in groups at night
- Reporting suspicious persons to Campus Safety & Security immediately
- Not leaving books, coats, purses, backpacks, lap top computers or any item of value unattended in public areas.
- Keeping residence hall rooms locked when unoccupied and not propping open exterior doors
- Faculty/staff keeping their offices locked when unoccupied or when leaving, even for a brief moment
- Keeping keys in a secure place, inaccessible to unauthorized persons
- Locking car doors at all times and securing valuables in the trunk

The following document will provide you with an overview of helpful security facts. While some of this material may seem more relevant to students, most of the information is of value to faculty and staff members as well. Everyone on campus should be safety-conscious and follow safety and security procedures.

CRIME LOGS and STATISTICS

Valor Christian College maintains a daily crime log that contains specified information about any Clery Act related crimes that were discovered or reported to the Campus Safety & Security Department. The College must make the crime log open to public inspection. The daily log is maintained by Campus Safety personnel and is available for review at the Campus Safety & Security office. Crime statistics for the past three years are provided at the end of this report.

The Campus Safety & Security Department prepares this annual report to ensure that the college community is informed and also to comply with the Jeanne Clery Act and the Violence Against Women Act requirements. The report is intended to provide disclosure of College safety and security policy and crime statistics for the past three

years. The complete report can be found through a link on the VCC website home page. This statistical report on crimes committed or reported is prepared with the cooperation and input of local law enforcement departments.

Campus crime, arrest, and referral statistics include those reported to Campus Safety & Security and to designated campus officials, including the Facilities Department and as provided by local law enforcement agencies. Each year notification is given to all enrolled students. Notification will be made by e-mail message to each student's VCC e-mail address. Faculty and staff receive similar notification through the College e-mail system. A copy of this report may also be obtained at the Campus Safety & Security office.

REPORTABLE GEOGRAPHIC LOCATIONS

The Clery Act requires that VCC disclose statistics for offenses committed in certain specific geographic locations. The specific locations are defined as follows:

On Campus

Any building or property owned or controlled by an institution within the same reasonably contiguous geographic area and used by Valor Christian College in direct support of, or in a manner related to, VCC's educational purposes, including residence halls. In addition, any building or property that is within or reasonably contiguous to buildings or property described in the above paragraph, that is owned by the institution but controlled by another person, is frequently used by students, and supports institutional purposes.

Residential Housing

Considered a subset of the "on-campus" category, the number of crimes reported for residential housing must be less than or equal to the number of reported crimes for the on-campus category.

Non-campus Building or Property

Any building or property owned or controlled by a student organization that is officially recognized by the institution; or any building or property owned or controlled by VCC 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.

On Public Property

All public property, including thoroughfares, streets, sidewalks and parking facilities, that is within the campus, or immediately adjacent to and accessible from the campus. This includes the sidewalk across the street, but does not include property beyond the sidewalk.

CAMPUS WIDE – EMERGENCY NOTIFICATION (ALERT) PROCEDURE

In the event that it becomes necessary to notify the entire campus of a significant emergency or dangerous situation involving an immediate threat to the health or safety of students, faculty and staff, VCC has developed a campus alert procedure. To further expand on the procedure, alerts may include but are not limited to notifications for campus closings or delays due to inclement weather, tornado warnings, campus wide power or utility failure, the need for immediate building evacuation, fire/explosion, and potential or actual acts of campus violence.

On an annual basis, the Emergency Alert system will be tested for effectiveness. Actual emergency situations can be documented and used in lieu of a test.

An immediate notification for a confirmed emergency or dangerous situation may not be issued if doing so will compromise efforts to: assist a victim, contain the emergency, respond to the emergency, or otherwise mitigate the emergency.

Two different kinds of alerts may be issued to the campus community:

"Timely warnings" – In the event that a crime or situation occurs either on or off campus that poses a threat to the College community, a timely warning will be issued by the Campus Safety & Security Department. Timely Warnings shall be issued whenever a Clery Crime that is considered to represent a serious or continuing threat to

students and employees is reported to College Security or a local police agency and has occurred within the College's Clery Geography. Whenever a timely warning is sent it may be sent to the entire Campus Community or to the relevant population if technology allows.

The Dean of Students, or a designee of the President, shall confirm the existence of a situation that may warrant a warning or notification and determine if a timely warning or emergency notification is warranted and the extent of the notification as appropriate.

Warnings and alerts can be activated in a number of ways:

- Alerts and warnings will be posted on the VCC website home page when appropriate.
- Alerts and Warnings will be posted on the ABHE-Solutions (educational management software and communication system) notifications page.
- Alerts and warnings will also be sent via College e-mail system to all students, faculty, and staff when appropriate as well via text to any students, faculty, and staff that have opted in for text notifications.
- Alerts and warnings will be sent by telephone and email to members of the campus administration who will then make sure to communicate the information with their various constituencies in the College community.

“Emergency Notifications” – In the event of a significant threat to the safety or health of the College community, VCC will immediately notify the community of the threat and give direction for the response to the threat as noted by the methods listed in the “TIMELY WARNINGS” section above.

As appropriate, emergency notifications may be targeted at only a segment or segments of the campus community that is at risk. Emergency notifications will be issued without delay unless doing so would compromise efforts to assist a victim or to contain, respond to, or otherwise mitigate the emergency.

The Dean of Students, or a designee of the President, shall confirm the existence of a situation that may warrant a warning or notification and determine if a timely warning or emergency notification is warranted and the extent of the notification as appropriate.

If there is a situation on campus that threatens the health and safety of our students, faculty, staff and visitors, VCC Campus Safety & Security officials will warn our campus community using one or more of the following methods:

- VCC webpage
- VCC email system
- Text messages
- Facebook
- Television
- Two-way radios
- Voice mails to all campus phones
- Word of mouth
- Letters to students, faculty and staff

In addition to criminal incidents, emergency notifications may be issued in situations such as, but not limited to:

1. Safety Related Issues:
An incident that occurs on campus that affects the personal safety and security of our population.
2. Health Related Issues:
Diagnosis of a serious or life threatening communicable or infectious disease.

Evidence of bio terrorism.

TO REPORT A CRIME

It is important for VCC to provide a safe and secure campus for the benefit of every person using it. The College provides a basic security service; however, security must be everyone's concern and you are encouraged to support your Campus Safety & Security staff in this effort.

The security of the College community's property is everyone's business. It may be through direct involvement or by observation only but by reporting an incident you will be positive in affecting everyone's safety and security. To report any incident on Campus, go to the Campus Safety & Security Office located near the MAC Café or just call Campus Safety & Security and personnel will come to you. You will need to complete an Incident Form. This is used by Campus Safety & Security. Campus Safety & Security personnel will advise you on what to do next. Of course, if the crime is very serious or resulted in physical harm and the need for law enforcement action is obvious; call 911. Then, call Campus Safety & Security. Campus Safety & Security location and contacts are:

Security Check Point:
Ministry Activities Center (MAC) Building
(614) 382-1159

The Campus Safety & Security Department encourages anyone who is the victim of or witness to any crime to promptly report the incident to the police and to Campus Safety & Security. Because college reports are public records, the College cannot hold reports of crime in confidence.

ACCESS POLICY

VCC is an open campus and during business hours, the College will be open to students, faculty, staff, and members of the public. During non-business hours, access to our College facilities is by authorized electronic access, issued keys, or by admittance via Campus Safety & Security. As much as possible, in concern for the safety and security of our students; students are not provided access to classrooms, etc. unless a responsible faculty or staff member is present to take charge. In the case of an emergency closing, the College will only admit those persons who have prior approval. Additionally, Campus Safety & Security discourages the occupancy of a single or sole employee for extended periods of time after hours and especially when there is no Campus Safety & Security presence on the campus.

COLLEGE BUILDING AND MAINTENANCE PROGRAMS

Each building on campus is checked routinely by Campus Safety & Security and Physical Plant personnel. This check includes an inspection of landscaping, grounds keeping, preventive maintenance, indoor and outdoor lighting, fire code compliance, door and window security, etc.

A routine inspection of all exterior parking lights and emergency phones is also conducted. The Physical Plant staff responds immediately to reports of potential safety and security hazards, such as broken windows and locks, and repairs are made as quickly as possible.

CAMPUS LAW ENFORCEMENT

Campus Safety & Security personnel have the authority to ask persons for identification and to determine whether the individuals have lawful business at VCC. Security personnel have the authority to issue parking violations to students, faculty, and staff. VCC partners with the Columbus Police Department (CPD) to provide additional security. CPD officers have the right to operate fully within their jurisdiction including making arrests if needed. Criminal incidents are referred to local law enforcement or State agencies that have jurisdiction on the campus. All crime victims and witnesses are strongly encouraged to immediately report the crime to Campus Safety & Security and/or to the appropriate law enforcement agency.

CONFIDENTIAL REPORTS

All reports will be investigated. VCC does not have procedures for voluntary, confidential reporting of crime statistics. Violations of the law will be referred to local law enforcement agencies and to the Dean of Students and/or President or his designee. When a potentially dangerous threat to the College community arises, timely warnings will be issued by College ABHE-Solutions announcement, e-mail, text, in-class announcements, or other appropriate means.

SECURITY AWARENESS AND CRIME PREVENTION

Periodically throughout the academic year, a safety and security awareness presentation is given to staff and faculty groups on our campus. In addition, the College has made available to employees and supervisors courses and training related to nonviolent workplace issues and intervention. This presentation is scheduled through Human Resources.

A common theme of all VCC awareness and crime prevention programs is to encourage students and employees to be aware of their responsibility for their own security and the security of others.

The following is a list of methods used on our campus to provide crime prevention and information to our students and employees:

- Distribution of pertinent literature at the start of the academic school year during the registration process, including a notice of the availability of the Annual Security & Fire Safety Report.
- Q&A opportunities via Campus Safety promotion events, held during the academic school year.
- Brochures available at the Campus Security Office on a wide range of campus safety issues.
- Periodic computer generated e-mails relative to Crime Prevention and Security Information sent to all members of the Campus Community.
- Timely reports of any threats to students or employees in a manner that will aid in the prevention of similar occurrences. These reports are issued through the computer generated e-mail system or through written or verbal information briefs provided by Resident Directors, Dean of Students or Campus Safety staff.
- Daily campus security patrols of the entire campus conducted by foot, bicycle, or in marked or unmarked vehicles.

DRUGS AND ALCOHOLIC BEVERAGES

VCC is a Drug-Free Work Place and a Drug Free School. College employees and students are prohibited from the unlawful possession, use, or distribution of alcohol or other drugs on College property or as part of College activities. Individuals involved in such activities can expect immediate dismissal and may be subject to prosecution under federal, state and local laws.

Information concerning the availability of drug or alcohol counseling, treatment, or rehabilitation is available to employees from the Dean of Students and the Human Resources Department.

To obtain a copy of the "Valor Christian College Program for Prevention of Drug and Alcohol Abuse," please see the Dean of Students.

According to Federal law:

Liquor law violations: The violation of state or local laws or ordinances prohibiting the manufacture, sale, transportation, possession or use of alcoholic beverages, not including driving under the influence and drunkenness.

Drug abuse violations: Violations of all laws (state and local laws are included) that prohibit the production, distribution and/or use of certain controlled substances and the equipment or devices utilized in their preparation and/or use. The unlawful cultivation, manufacture, distribution, sale, purchase, use, possession, transportation or importation of any controlled drug or narcotic substance.

SEXUAL PREDATOR OR OFFENDER NOTICE

Federal and State laws require a person designated as a sexual predator or offender to register with the State of Ohio. The State is then required to provide notification to the local law enforcement agency of where the registrant resides. The Dean of Students maintains information on sexual predators or near VCC. In addition, information may be obtained through the Franklin County <http://sheriff.franklincountyohio.gov/> or (614) 525-3360 and Fairfield County <http://www.sheriff.fairfield.oh.us/> or 740-652-7900 law enforcement agencies. To locate Registered Sex Offenders in the State of Ohio, visit http://www.communitynotification.com/cap_main.php?office=53991

SEXUAL MISCONDUCT POLICY

Valor Christian College is committed to creating and maintaining an environment that fosters a biblically-based community and enhances academic excellence, moral integrity, and physical purity. Sexual misconduct of any kind is not consistent with the standards of conduct expected of the College's students, faculty, or staff and is strictly prohibited. In addition to the prohibitions in this policy, the Student Handbook places strict limits on student social life and dating consistent with the religious nature of the College. Students are encouraged to review both resources to understand the behavioral expectations of the College.

Valor Christian College does not discriminate on the basis of sex in its education programs and activities. The College is committed to creating and maintaining an educational environment free from all forms of sex discrimination, including sexual harassment, sexual violence, and all forms of sexual misconduct, which includes sexual assault, stalking, retaliation and intimidation, dating and domestic violence. All forms of sex discrimination, sexual harassment, and sexual misconduct, as they are defined in this policy, are collectively known as "prohibited conduct." They not only violate a person's feelings of trust and safety, but they can also substantially interfere with the educational or working environment.

The College shall take immediate and appropriate steps to investigate all allegations of prohibited conduct in accordance with the guidelines contained in this policy. In those cases where prohibited conduct is substantiated, the College will take prompt and effective steps to eliminate the misconduct, prevent its reoccurrence, and address its effects. Individuals who are found to have engaged in prohibited conduct will be subject to appropriate disciplinary action.

The College will employ all reasonable efforts to ensure confidentiality and protect the privacy interests of all individuals involved in the reporting of prohibited conduct to the greatest extent possible. The College's full policy and procedures related to privacy and confidentiality are discussed in greater detail below.

Scope

Who: This policy applies to all members of the College community, including students, faculty, staff, independent contractors, agents of the College, volunteers, contractors or other persons subject to the control and supervision of the College, and third parties. For purposes of this policy, third parties include, but are not limited to, guests and/or visitors of the College on College property (e.g., visiting speakers, parents and family members, prospective students), vendors doing business with, or seeking to do business with the College, and other individuals who come into contact with members of the College community at College-related events or activities (whether such events occur on or off College property). These standards apply equally regardless of sex, gender, sexual orientation, gender identity, or gender expression of any of the individuals involved.

What: This policy applies to all forms of the prohibited conduct listed below, including all forms of sexual misconduct, which includes – but is not limited to – sexual harassment, sexual violence, domestic violence, dating violence, sexual assault, stalking, and cyber-stalking.

Where: This policy applies to all College operations, programs and activities, and covers conduct that takes place on College property. This includes any building or property owned or controlled by the College and used in direct support of, or in a manner related to, the College’s educational purposes, including residence halls, dining halls, and public property within or immediately adjacent to and accessible from campus. This also includes any building or property owned or controlled by a student organization that is officially recognized by the College and any building or property not within the same reasonably contiguous geographic area of the College that supports or relates to the College’s educational purposes and is frequently used by students. This policy also applies to prohibited conduct that takes place off-campus, outside the College’s operations, programs, or activities if the prohibited conduct has continuing adverse effects in the College’s operations, programs, or activities. This can include prohibited online or electronic conduct. In determining whether the College has jurisdiction over off-campus conduct that is not part of the College’s educational operations, programs, or activities, the Title IX Compliance Officer will consider the seriousness of the alleged conduct, the risk of harm involved, whether both parties are members of the College community, whether the off-campus conduct is part of a series of actions that occurred both on and off campus and whether there is a continuing effect on the College community.

Programs: This policy covers all educational, extracurricular, and athletic programs, and all campus and College-related activities, including, but not limited to, student organizations, community organizations with student and/or faculty participation, and all other educational or extracurricular events hosted by or at the college.

Relationships: This policy covers prohibited conduct occurring between individuals in various types of relationships. These include, but are not limited to, student to student, staff to staff, faculty member to faculty member, visitor/contracted employee to faculty/staff, faculty member to student, staff to student, supervisor to subordinate, and coach to student athlete. Prohibited conduct may be an act or acts committed by an individual or collective actions committed by members of a group or organization. These acts may be committed against an individual or against a group or organization. These acts may be committed by a stranger, an acquaintance, or someone with whom the individual has a social, romantic, or intimate relationship. These acts may be committed by or against any individual, regardless of sexual orientation or gender identity.

Other Violations of this Policy

The College will also take immediate steps to impose disciplinary action on individuals engaging in any of the following prohibited acts:

- A. Retaliating against a person who has made a report or filed a complaint under this policy, or who has participated as a witness in an investigation under this policy.
- B. Filing a malicious or knowingly false report or complaint under this policy.
- C. Disregarding, failing to investigate adequately, or delaying investigation of allegations of prohibited conduct, when responsibility for reporting and/or investigating allegations of prohibited conduct comprises part of one’s duties as an employee or agent of the College.

Title IX Coordinator

The College designates the following individual to serve as the College’s “Title IX Coordinator”:

Laquetta Cortner, Ph.D.

Vice President of Academic Affairs

Phone: 614.837.4088 ext. 475

cortnerl@valorcollege.edu

Inquiries concerning the application of Title IX may be referred to the Title IX Coordinator. The Title IX Coordinator is responsible for overseeing implementation and enforcement of this policy.

The Title IX Coordinator will be informed of all non-confidential complaints of prohibited conduct, and will oversee the College's centralized review, investigation, and resolution of these complaints to ensure the College's compliance with Title IX and the effective implementation of this Policy. The Title IX Coordinator is also responsible for identifying and addressing any patterns or systemic problems that arise during the review of such complaints.

The Title IX Coordinator will be available during regular business hours to discuss concerns related to prohibited conduct under this policy, and assist students, staff, other members of the College community, and third parties who seek support or advice regarding any aspect of this policy.

The Title IX Coordinator shall accept all reports or complaints of prohibited conduct directly from any member of the College community. All employees of the College are considered "responsible employees" under Title IX and are obligated under this policy to report incidents of prohibited conduct that are witnessed by or reported to them to the Title IX Coordinator within two (2) business days of learning of the incident(s). The Title IX Coordinator must be informed of all reports and complaints related to prohibited conduct under this policy, even if the reports or complaints are first received by the Dean of Students, Disciplinary Committee, or other individual.

Upon receipt of a report or complaint either directly or otherwise, the Title IX Coordinator will initiate either the College's informal or formal process (depending upon the request of the person alleging the prohibited conduct and the nature of the alleged prohibited conduct), or the Title IX Coordinator will designate a specific individual to conduct such a process. In the case of a formal complaint, the Title IX Coordinator will refer the complaint to the College's Disciplinary Committee for investigation, when appropriate.

The Title IX Coordinator has received adequate training on what constitutes prohibited conduct under this policy, including but not limited to sexual harassment and sexual violence.

Privacy and Confidentiality

The College is committed to maintaining the privacy of all individuals involved in reporting prohibited conduct. The privacy of the parties will be respected and safeguarded to the extent possible, consistent with the College's legal obligations to investigate and take appropriate action to eliminate the prohibited conduct, prevent its recurrence, and address its effects.

Privacy and confidentiality have distinct meanings under this policy.

Privacy

Privacy generally means that the information related to a report under this policy will only be shared with those individuals and College employees who "need to know" in order to assist in the active review, investigation, or resolution of the report, including the issuance of interim measures. While not bound by confidentiality, these individuals will be discreet and respect the privacy of all individuals involved in the process. The College will designate which employees have a legitimate need to know about individual conduct complaints pursuant to the Family Educational Rights and Privacy Act (FERPA) and will share information accordingly.

Confidentiality

Confidentiality means that certain information shared by an individual with designated campus or community professionals cannot be revealed to any other individual without express permission of the individual. Those campus and community professionals include medical providers, mental health providers, ordained clergy, attorneys and rape crisis counselors, all of whom have privileged a confidential-communications that is entitled to legal protection recognized by the law. These individuals are prohibited from breaking confidentiality without consent, unless there is an imminent threat of harm to self or others, or the conduct involves suspected abuse of a minor under the age of 18.

Community members wishing to seek completely confidential assistance may seek assistance from the following:

Counseling Services:

- Balance Counseling and Coaching LLC.
Sam Long
5300 East Main St. Suite 105.
Columbus, OH. 43213
(614) 560-7966

Clergy Contact:

- World Harvest Church
Local Church Department.
4595 Gender Road.
Canal Winchester, OH 43110
(614)837-1990 ext. 310

Medical Assistance (call in advance for Sexual Assault Nurse Examiner services):

- Mount Carmel East Hospital,
6001 East Broad Street,
Columbus, Ohio 43213,
(614) 234-6010
- University Hospital East,
1492 East Broad Street,
Columbus, Ohio 43205,
(614) 257-3000

Hotline Assistance:

- Sexual Assault Response Network of Central Ohio,
(614) 267-7020
- CHOICES for Victims of Domestic Violence,
(614) 224-4663
- Center for Family Safety and Healing,
(844) 234-LINE or text to 87028
- National Domestic Violence Hotline,
(800) 799-7233.

Limits to Confidentiality:

Mandatory Reporting of Child Abuse

All members of the College community are required to report any knowledge or reasonable suspicion that a minor (under 18 years old) is experiencing abuse or neglect based on information shared by the minor, any other individual, or one's own observations or knowledge. A College community member suspecting child abuse or neglect should immediately contact Franklin County Children Services at (614) 229-7000 or, if appropriate, call law enforcement. Reports by employees regarding incidents occurring at the College or at a College program or activity should also be reported to the Title IX Coordinator as soon as possible after the mandatory report to Children Services and/or law enforcement is made.

Ohio Felony Reporting Requirement

Under Ohio law, all individuals must report felonies, including sexual assault, unless the individual is statutorily prohibited from doing so as a result of a privilege exempted from such reporting under Ohio Revised Code Section 2921.22 (i.e., physicians, nurses, psychologists, licensed counselors, clergy, other enumerated professionals, or spouses). This legal requirement means that the Title IX Coordinator will report any potential

felony or any crime of violence to law enforcement. An individual who experiences sexual assault may choose whether and how to participate in any subsequent criminal investigation.

Ohio Medical Professional Reporting Requirements

In Ohio, medical professionals also have legally mandated reporting responsibilities. However, the medical professional must deem the patient medically stable before reporting and must communicate to the patient that the patient does not have to report and/or speak to the police. If the patient chooses not to speak to police at the time of the medical examination, the medical professional does not need to report the patient's name - only the date, general time, and general location of the incident.

Clery Act Reporting

Originally known as the Campus Security Act, the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act ("the Clery Act") is the federal law that requires colleges and universities to disclose information about crime on and around their campuses. Pursuant to the Clery Act, anonymous statistical information must be collected and shared where required by the Clery Act. Annual Clery reporting must be submitted to the U.S. Department of Education. The information contained in the annual Clery report tracks the number of Clery reportable offenses occurring at campus locations and does not include the names or any other identifying information about the persons involved in such incidents.

Prohibited Conduct

This policy prohibits a broad continuum of behaviors, including, but not limited to, the behaviors referenced and described below.

Sexual Harassment

Pursuant to Title VII of the Civil Rights Act of 1964 and Title IX of the Educational Amendments of 1972, and related regulations and guidance, "sexual harassment" is defined as unwelcome sexual advances, requests for sexual favors, and other unwanted verbal or physical conduct of a sexual nature, when or more of the following conditions are present:

- Submission to such conduct is made either implicitly or explicitly a term or condition of an individual's employment, evaluation of academic work, or status in a class, educational program, or activity;
- Submission or rejection of such conduct by an individual is used as the basis for employment or educational decisions affecting such individual; or
- Such conduct has the purpose or effect of unreasonably interfering with the individual's work or educational performance where it is sufficiently serious, pervasive, or persistent as to create an intimidating, hostile, demeaning, or sexually offensive working, academic, or social environment under both an objective (a reasonable person's view) and subjective (the complainant's view) standard.

Sexual harassment may involve the behavior of a person of any gender against a person of any other gender. Title IX prohibits harassment of all students and employees regardless of the sex of the harasser, and also prohibits gender-based harassment, which may include acts of verbal, nonverbal, or physical aggression, intimidation, or hostility, based on sex or sex-stereotyping or opposite sex stereotyping.

Prohibited acts that constitute sexual harassment may take a variety of forms. Examples of the kinds of conduct that may constitute sexual harassment include, but are not limited to:

- The making of offensive written or oral sexual innuendoes, suggestive comments, jokes of a sexual nature, sexual propositions, threats, or propositions toward or by a fellow staff member, student, or other person associated with the College, or third parties.

- Causing the placement of offensive sexually suggestive objects, pictures, or graphic commentaries in the educational or work environment or the making of offensive sexually suggestive or insulting gestures, sounds, leering, whistling, and the like to or by a fellow staff member, student, or other person associated with the College or third parties.
- Threatening or causing unwanted touching, contact, or attempts at same, including patting, pinching, brushing the body, or coerced sexual activity with or by a fellow staff member, student, or other person associated with the College, or third parties.
- Unwelcome sexual propositions, invitations, solicitations, and flirtations.
- Unwanted physical and/or sexual contact.
- Threats or insinuations that a person's employment, wages, academic grade, promotion, classroom work or assignments, academic status, participation in athletics or extracurricular programs or events, or other conditions of employment or education may be adversely affected by not submitting to sexual advances.
- Unwelcome verbal expressions of a sexual nature, including graphic sexual commentaries about a person's body, dress, appearance, or sexual activities; the unwelcome use of sexually degrading language, jokes, or innuendoes; unwelcome suggestive or insulting sounds or whistles; obscene telephone calls.
- Sexually suggestive objects, pictures, videos, audio recordings, electronic communications, or literature, placed, created, or delivered in the work or educational environment, which may embarrass or offend individuals.
- Unwelcome and inappropriate touching, patting, or pinching; obscene gestures.
- A pattern of conduct, which can be subtle in nature, that has sexual overtones and is intended to create or has the effect of creating discomfort and/or humiliation to another.
- Remarks speculating about a person's sexual activities or sexual history, or remarks about one's own sexual activities or sexual history.
- In the context of employees, consensual sexual relationships where such relationship leads to or could be perceived as favoritism of a subordinate employee with whom the superior is sexually involved and where such favoritism adversely affects other employees or otherwise creates a hostile work environment.
- Verbal, nonverbal, or physical aggression, intimidation, or hostility based upon sex or sex-stereotyping that does not involve conduct of a sexual nature.

Not all behavior with sexual connotations constitutes unlawful sexual harassment, although it may violate a separate provision of the College's student code of conduct. Sex-based or gender-based conduct must be sufficiently severe, pervasive, and persistent such that it adversely affects, limits, or denies an individual's employment or education, or such that it creates a hostile or abusive employment or educational environment.

In addition, all forms of sexual misconduct that are identified in this policy are also prohibited forms of sexual harassment, including, but not limited to, the behaviors referenced and defined in detail below.

A. **Sexual Assault:** Either of the following:

1. Non-consensual sexual intercourse: The penetration, no matter how slight, of the sex organs, anus, or mouth of another person, with any body part of object, or oral penetration by a sex organ of another person, without the consent of the complainant (including instances where the complainant is incapable of giving consent because of his/her age), by force or threat of force, or where the complainant is incapacitated to the point that they are not capable of giving consent.

2. **Non-consensual sexual contact:** The touching of the private body parts, including but not limited to, the genitals, breasts, thighs, groin, or buttocks of another person for the purpose of sexual gratification, without the consent of the complainant (including instances where the complainant is incapable of giving consent because of his/her age), by force or threat of force, or where the complainant is incapacitated to the point that they are not capable of giving consent.

B. Sexual Exploitation: Taking advantage of the sexuality of another person without consent, or in a manner that extends the bounds of consensual sexual activity without the knowledge of the other individual for any purpose, including sexual gratification, financial gain, or personal benefit. Examples of sexual exploitation include the following actions (including when they are done via electronic means, methods, or devices):

- Observing another individual's nudity or sexual activity or allowing another to observe consensual sexual activity without the knowledge and consent of all parties involved;
- Non-consensual streaming of images, photography, video, or audio recording of sexual activity or nudity, or distribution of such without the knowledge and consent of all parties involved;
- Non-consensual recording of individuals in restrooms or locker rooms, regardless of whether the images captured reveal sexual activity or nudity;
- Prostituting another individual;
- Exposing one's genitals in non-consensual circumstances;
- Knowingly exposing another individual to a sexually transmitted disease or virus without that individual's knowledge; and
- Inducing incapacitation in another person with the intent to engage in sexual conduct, regardless of whether prohibited sexual conduct actually occurs.

C. Stalking: A pattern of conduct directed at a specific person that causes the person to reasonably believe that the offender will cause them bodily injury or causes substantial emotional distress to that person. Conduct that can amount to stalking may include any actions directed at another person, whether done directly, indirectly, through others, via devices, or via any other methods or means (specifically including electronic means such as the internet, social networks, blogs, cell phones, text or other digital forms of communication), including, but not limited to:

- Following, or being or remaining in close visual or physical proximity to a person;
- Repeated oral or written threats;
- Unwelcome/unsolicited written communication, including letters, cards, emails, instant messages, and messages on online bulletin boards;
- Unwelcome/unsolicited communications about persons, their family members, friends, or co-workers;
- Monitoring, observing, or conducting surveillance of a person;
- Giving gifts or objects to, or leaving items for, a person;
- Implicitly threatening physical conduct or any combination of these behaviors directed toward a person.

- D. **Dating Violence:** Any act of violence or threatened act of violence, including but not limited to, physical violence, sexual violence (verbal or physical acts that are unwelcome or without consent), emotional violence, and economic violence, committed by a person who is or has been in a social relationship of a romantic or intimate nature with the complainant.
- E. **Domestic Violence:** A felony or misdemeanor crime of violence committed by a family or household member.
- F. **Retaliation:** Any real or perceived act or attempt to seek retribution against any individual or group of individuals involved in the investigation and/or resolution of a report under this policy. Retaliation can take many forms, including continued abuse or violence, threats, and intimidation, or more subtle actions such as the refusal to allow an individual to access a benefit based on their participation in an investigation. Any individual or group of individuals, including but not limited to a complainant or respondent, can be held accountable for retaliation under this policy.
- G. **Intimidation:** Threatening, or causing physical harm, written or verbal abuse or other conduct that threatens or endangers the health or safety of any person; or implied threats or acts that cause an unreasonable fear of harm in another. Intimidation is considered to be a form of sexual harassment prohibited under this policy when it relates to sex, gender, or an intimate relationship based on sex or gender.

Consent

Consent, in reference to sexual activity and as it used throughout this policy, is defined as clear, knowing, and voluntary agreement to engage in sexual activity. Consent is demonstrated through mutually understandable words and/or actions that clearly indicate a willingness to engage freely in sexual activity, and can be withdrawn at any time. Silence cannot be assumed to indicate consent. In addition, it is important to be aware of the following guidance related to consent:

- A person who does not physically resist or verbally refuse sexual activity is not necessarily giving consent.
- Consent is not effective if it results from physical force, intimidation, or coercion, or any other factor that would eliminate an individual's ability to exercise free will to choose whether or not to have sexual contact or engage in sexual activity.
- Any individual who is physically incapacitated – by alcohol or other drug consumption, whether voluntarily or involuntarily – or is asleep, unconscious, unaware, or other physically helpless is considered unable to give consent.
- Individuals with a previous or current intimate relationship do not automatically give either initial or continued consent to sexual activity and past consent does not imply future consent. In addition, consent to engage in sexual activity with one person does not imply consent to engage in sexual activity with another person.
- Under Ohio law, a person must be at least 16 years of age in order to give consent to participate in sexual activity with an individual over the age of 18. Consent can never be given by minors under the age of 13.

Incapacitation

Incapacitation, as it used throughout this policy, is defined as the ability – temporarily or permanently – to give consent because an individual is mentally and/or physically helpless, asleep, unconscious, or unaware that sexual activity is occurring.

Where alcohol or drugs are involved, incapacitation is a state beyond drunkenness or intoxication. The impact of alcohol and other drugs varies from person to person; however, warning signs that a person may be approaching incapacitation may include slurred speech, vomiting, unsteady gait, strong odor of alcohol, combativeness, or emotional volatility.

Evaluating incapacitation requires an assessment of how the consumption of alcohol and/or drug affects an individual's:

- Decision-making ability;
- Awareness of consequences;
- Ability to make informed judgments;
- Capacity to appreciate the nature and quality of the act; or
- Level of consciousness

An individual who engages in sexual activity with someone the individual knows or reasonably should know is incapable of making a rational, reasonable decision about whether to engage in sexual activity is in violation of this policy.

Resources Available for Support

A first step for any complainant, reporting person, or third party witness is often to choose how to proceed following the occurrence of prohibited conduct under this policy.

The College provides two distinct resources:

Confidential Resources that do not involve notifying the College of the incident unless the complainant requests such action or there is an immediate danger to the campus or the reporter; and

Reporting Options that notify the College of the incident and begin the Title IX assessment and ultimate resolution of the report through remedies or investigation and imposition of any appropriate sanctions.

The College recognizes that choosing one of these options can be difficult and encourages individuals to seek the support of College and community resources. Individuals are encouraged to use all available resources, regardless of when or where the incident occurred.

Confidential Resources

Students, employees, and faculty may access confidential sources both within and outside the College. For example, mental health providers, medical providers, clergy, attorneys, and counselors are confidential resources that are barred from reporting the incident to the College or law enforcement without consent except in very limited circumstances. Confidential resources include, but are not limited to:

Counseling Services:

- Balance Counseling and Coaching LLC.
Sam Long
5300 East Main St. Suite 105.
Columbus, OH. 43213
(614) 560-7966

Clergy Contact:

- World Harvest Church
Local Church Department.
4595 Gender Road.
Canal Winchester, OH 43110
(614)837-1990 ext. 310

Medical Assistance (call in advance for Sexual Assault Nurse Examiner services):

- Mount Carmel East Hospital,
6001 East Broad Street,
Columbus, Ohio 43213
(614) 234-6010
- University Hospital East,
1492 East Broad Street,
Columbus, Ohio 43205,
(614) 257-3000

Hotline Assistance:

- Sexual Assault Response Network of Central Ohio,
(614) 267-7020
- CHOICES for Victims of Domestic Violence,
(614) 224-4663
- Center for Family Safety and Healing,
(844) 234-LINE or text to 87028
- National Domestic Violence Hotline,
(800) 799-7233
- National Dating Abuse Helpline
(866) 331-9474

Confidential resources not affiliated with the College will not share information about a patient/client with the College without the individual's express written permission. Confidential resources affiliated with the College may, however, submit non-identifying information about the incident for purposes of making a statistical report under the Clery Act.

College employees who are not listed as confidential resources are required to report Title IX concerns to the Title IX Coordinator. Individuals may also choose to report prohibited conduct directly to the Title IX Coordinator. The Title IX Coordinator will assess the allegations and any request for confidentiality regarding the allegations, confer with the complainant, and proceed with informal or formal resolution, if appropriate and as detailed in this policy. The Title IX Coordinator can also help complainants identify sources of support during the complaint process.

Emergency medical and law enforcement assistance are also available where medical treatment is necessary or criminal activity occurred. While College employees, like other Ohio citizens, are required by law to report felonies to law enforcement, individuals may choose how whether to participate in such reports and have the option to: (1) notify law enforcement authorities, including local police, (2) be assisted by College faculty members, such as the Title IX Coordinator, in notifying law enforcement, if the complainant so chooses, or (3) declining to notify such authorities. Law enforcement will typically respect the wishes of the complainant in determining whether to investigate and/or pursue criminal charges. Law enforcement may be reached in an emergency by dialing 911.

The College encourages all individuals who have experienced some form of sexual violence to seek assistance from medical provider(s) and/or law enforcement immediately after an incident of sexual misconduct, whether or not the individual plans to pursue formal criminal charges. This will ensure preservation of evidence that may assist in proving that the alleged offense occurred, which in turn preserves more options for the individual if they later choose to pursue charges. Prompt action may also be instrumental in obtaining a protection order, if desired.

Medical assistance may also be helpful in seeking treatment for injuries, preventing sexually transmitted diseases, and providing other health services. In instances involving sexual assault, a medical examination by a Sexual

Assault Nurse Examiner (“SANE”) can help preserve evidence through use of a “rape kit” and other techniques. Local organizations providing access to SANE evaluations include:

- The Lighthouse – (740) 687-4423
- Grant/Riverside Hospital – (614) 566-8596 or (614) 566-5000
- Mount Carmel/St. Ann’s Hospital – (614) 234-7387 or (614) 234-6000
- University Hospital East – (614) 366-7246 or (614) 257-3000

Local emergency rooms can also assist with access to SANE examinations. Calling ahead can help ensure that a SANE is onsite and available to assist when you arrive.

Individuals who file criminal charges may seek an order of protection. In addition, civil protection orders may be available. More information on such protection orders may be obtained from an attorney, the applicable prosecutor’s office, or the Clerk of Courts. In Franklin County, the Domestic Relations Division is located at 373 S. High Street, Columbus, and the Protection Order Liaison may be reached at (614) 525-3766. In Fairfield County, the Domestic Relations Division can be reached at (740) 652-7440 for more information on the application process for protection orders. Assistance with questions may also be available through the Capital University Family Advocacy Clinic at (614) 236-6779.

Members of the College community may also access resources in the local community, including local hospitals, mental health professionals, and the hotlines listed above. These organizations can provide crisis intervention services, counseling, medical attention, and assistance in interfacing with the criminal justice system. All individuals are encouraged to use the resources that are the best suited to their needs.

The Title IX Coordinator will ensure that written information is available to students and employees about existing counseling, health, mental health, victim advocacy, legal assistance, student financial assistance, visa and immigration assistance, student financial aid, and other services available within the College community as may be appropriate in a particular situation.

The College will also provide written notification to complainants about options for, available assistance in, and how to request changes in academic, transportation, and working situations or interim protective measures, and that such protective measures will be made if the complainant requests them, if they are reasonably available, regardless of whether the complainant chose to file a formal report or pursue criminal charges.

Reports and Complaints of Prohibited Conduct

The College encourages all members of the College community to promptly report incidents of potentially prohibited conduct to the Title IX Coordinator, the Dean of Students, a member of the College’s Disciplinary Committee, or any other College administrator so that the College may address the conduct as soon as possible. Any College employee who receives such complaint, or otherwise becomes aware of an occurrence of prohibited conduct, is required to promptly report the information to the Title IX Coordinator.

Members of the College community who believe they have been subject to prohibited conduct are entitled to utilize the College’s complaint process that is set forth below. Initiating a complaint, whether formally or informally, will not adversely affect the complaining individual’s employment or participation in educational or extra-curricular programs. While there are no time limits for initiating complaints under this policy, individuals should make every effort to file a complaint as soon as possible after the conduct occurs while the facts are known and potential witnesses are available.

Any individual may make an anonymous report concerning any form of prohibited conduct. A report can be made without disclosing one’s own name, identifying the respondent, or requesting any action. Depending on the level of information available about the incident or the individuals involved, anonymous reporting may limit the College’s ability to investigate, respond, or take further action.

As with all other reports, all anonymous reports will go to the Title IX Coordinator for review and appropriate response and action. Where there is sufficient information, the College will ensure that anonymous reports are reviewed and included in its Annual Security Report as appropriate in compliance with the Clery Act.

NOTE: Individuals who have a duty to report information to the Title IX Coordinator under this policy (i.e. College employees who become aware of prohibited misconduct) may not make such reports anonymously.

Investigation and Resolution Procedures

The College provides both informal and formal procedures for resolving complaints under this Policy. These procedures apply to all complaints filed by students, staff, or third parties, or on their behalf, alleging sex discrimination carried out by other students, staff, or third parties.

Individuals may either request informal resolution, orally or in writing, through the Title IX Coordinator, or may file a formal complaint with the Title IX Coordinator.

Regardless of how an individual chooses to proceed with his/her complaint, whenever an individual reports to the College that s/he has been subject to sexual misconduct, including sexual assault, stalking, dating violence, or domestic violence, the College will provide the individual with a written copy of this policy (which includes information on available resources and law enforcement reporting options), as well as a written explanation of rights and options under this policy.

Each resolution procedure is guided by the same principles of fairness and respect for all parties. All individuals who violate the standards contained in this policy will be held accountable for their behavior through a process that protects the rights of both the complainant and the respondent and is prompt, fair, and impartial. Resources are available for both students and employees, whether as complainants or respondents, to provide support and guidance throughout the investigation and resolution of the complaint.

The informal and formal procedures set forth below are not intended to interfere with the rights of any individual to pursue a complaint of unlawful harassment, unlawful discrimination, prohibited sexual misconduct, or unlawful retaliation with the United States Department of Education Office for Civil Rights (OCR), the Ohio Civil Rights Commission (OCRC), or Equal Employment Opportunity Commission (EEOC), or to pursue a criminal complaint with law enforcement authorities.

All College proceedings under this policy are conducted in compliance with the requirements of the Family Educational Rights and Privacy Act (FERPA), the Clery Act, the Campus SaVE Act, Title IX, and state and federal law. No information shall be released from such proceedings except as required or permitted by law and College policy.

Informal Complaint Procedure

The goal of the informal complaint procedure is to stop inappropriate behavior and to investigate and facilitate resolution through an informal means, if possible. The informal complaint procedure is provided as a less formal option for anyone who believes they have been subject to prohibited conduct and is designed to eliminate a hostile environment without taking disciplinary action against a respondent. The informal procedure will only be used if both parties voluntarily agree to do so.

As an initial course of action, if an individual feels that s/he is being subjected to prohibited conduct, and s/he is able and feels safe doing so, the individual should tell or otherwise inform the other party that the conduct is unwelcome and must stop. Such direct communication should not be utilized in circumstances involving sexual violence. The complaining individual should address the conduct as soon after it occurs as possible. The Title IX Coordinator is available to support and counsel individuals when taking this initial step or to intervene on behalf of the individual if requested to do so. An individual who is uncomfortable or unwilling to inform the other individual of his/her complaint is not prohibited from otherwise filing an informal or a formal complaint. In addition, the informal resolution process is inappropriate for incidents of sexual assault and sexual violence.

An individual may make an informal complaint, either orally or in writing: (1) a faculty member, including the Dean of Students; (2) a member of the College's Disciplinary Committee; and/or (3) directly to the Title IX Coordinator. Though a complaint may be made in various ways, they shall all be referred to the Title IX Coordinator, who will ensure consistent application of this policy to all individuals and allow the College to respond promptly and

equitably to eliminate the prohibited conduct, prevent its recurrence, and address its effects. Faculty members may continue to refer all potential violations of College policies and procedures to the Disciplinary Committee, which will then refer any Title IX-related allegations to the Title IX Coordinator. The Title IX Coordinator shall assess the severity of the alleged conduct and the potential risk of a hostile environment for others to determine whether informal resolution is appropriate. The Title IX Coordinator has discretion to determine the appropriate method of resolution.

Upon determining that informal resolution is appropriate, the Title IX Coordinator will either facilitate an informal resolution on his/her own, as described below, or appoint another individual to facilitate an informal resolution. The Title IX Coordinator will consult further with the Complainant, if necessary, inform the person who is the subject of the allegations, and gather additional relevant information as necessary. The Title IX Coordinator may also put in place any appropriate interim measures, as discussed in Section XI of this policy, to protect the educational and work environment.

Mediation is available as an informal resolution method, provided that both the complainant and respondent agree to participate. Unlike other informal resolution options, mediated agreements may include interim measures and/or any form of sanction outlined below. Any information shared during the mediation process shall be confidential and shall not be used in the resolution of a formal complaint. No mediation agreement shall be binding unless it is written and signed by the complainant, the respondent, and an appropriate representative of the College. The Title IX Coordinator or designee shall act as the mediator.

While there are no set time limits within which an informal complaint must be resolved, the Title IX Coordinator or designee will exercise his/her authority to attempt to resolve all informal complaints within fifteen (15) business days of receiving the informal complaint. In all cases, the Title IX Coordinator will resolve the complaint within a reasonably prompt timeframe. Parties who are dissatisfied with the results of the informal complaint process may proceed to file a formal complaint, and, as stated above, parties may request that the informal process be terminated at any time to move to the formal complaint process.

At any point, a complainant may decide to end the informal resolution process and pursue a formal resolution by providing written notice to the Title IX Coordinator. If, after initiating a formal complaint, a complainant and respondent agree to pursue informal resolution, they may do so while the formal complaint is being processed and prior to the conclusion of the investigation. Informal resolution is not always appropriate and will not be used to resolve allegations of non-consensual sexual intercourse and other inappropriate allegations.

Formal Complaint Procedure

If a complaint is not resolved through the informal complaint process, if one of the parties has requested that the informal complaint process be terminated to move to the formal complaint process, or if the complainant elects to file a formal complaint initially, the following process shall be implemented.

An individual who believes s/he has been subjected to prohibited conduct, hereinafter referred to as the "Complainant", may file a formal complaint, either orally or in writing, with faculty members, the Dean of Students, members of the College's Disciplinary Committee, or the Title IX Coordinator. Due to the sensitivity surrounding complaints of prohibited conduct, timelines are flexible for initiating the complaint process; however, individuals should make every effort to file a complaint in a timely manner after the conduct occurs while the facts are known and potential witnesses are available. If a Complainant informs faculty members, the Dean of Students, or members of the College's Disciplinary Committee, either orally or in writing, about any complaint of prohibited conduct, that information must be referred to the Title IX Coordinator or designee within two (2) business days. Though a report may be made in various ways, all reports shall be referred to the Title IX Coordinator, who will ensure consistent application of this policy to all individuals and allow the College to respond promptly and equitably to eliminate discrimination and harassment, prevent its recurrence, and address its effects.

All formal complaints must be in writing and signed and dated by a Complainant or a third party filing on behalf of a potential Complainant (known as the Reporter). It should also include the following information to the extent it is available: the identity of the individual believed to have engaged in prohibited conduct; a reasonably detailed description of the facts upon which the complaint is based, including the date and place that such facts occurred;

a list of potential witnesses; and the resolution sought by the Complainant. The complaint should also include any other information that the Complainant or Reporter believes may be relevant to the investigation. However, a complaint should not be delayed if such sources of information are unknown or unavailable.

If the Complainant is unwilling or unable to provide a written statement including the information set forth above, the Title IX Coordinator shall ask for such details in an oral interview. Thereafter, the Title IX Coordinator will prepare a written summary of the oral interview, and the Complainant will be asked to verify the accuracy of the reported charge by signing the document. The Complainant shall be permitted to bring one (1) advisor of their choice to any meeting with the Title IX Coordinator.

Upon receiving a formal complaint, the Title IX Coordinator will consider whether any interim protective actions should be taken in the investigatory phase to protect the Complainant from further prohibited conduct, as discussed in detail in Section XI of this Policy. In making such a determination, the Title IX Coordinator should consult the Complainant to assess his/her agreement to the proposed action. If the Complainant is unwilling to consent to the proposed change, the Title IX Coordinator may still take whatever actions s/he deems appropriate in consultation with the Dean of Students.

Within two (2) business days of receiving the complaint, the Title IX Coordinator or a designee will determine whether it is appropriate to initiate a formal investigation. The goal of the investigation is to gather all relevant facts and determine if there is sufficient information to refer the report for formal investigation by the Disciplinary Committee.

Based on the information gathered, the Title IX Coordinator or a designee will determine whether the information, if true, would constitute a violation of this policy, such that a formal investigation is warranted. If other violations of the College's Student Handbook or Student Code of Conduct Policy are alleged, the Title IX Coordinator shall determine whether it is appropriate to include those violations in this investigation process.

If the Title IX Coordinator or designee has determined that a formal investigation is warranted, that complaint shall be promptly referred to the College's Disciplinary Committee. The Disciplinary Committee will inform the individual alleged to have engaged in the prohibited conduct, hereinafter referred to as the "Respondent", that a complaint has been received. The Respondent will be informed about the nature of the allegations and provided with a copy of this policy. The Respondent must also be informed of the opportunity to submit a written response to the complaint within five (5) business days. The Respondent will be permitted to bring one (1) advisor of their choice to any meeting with the Title IX Coordinator.

All members of the Disciplinary Committee shall have sufficient training or experience and have received training on issues related to sexual assault, dating and domestic violence, and stalking, and how to conduct an investigation that protects the safety of the individuals involved and promotes accountability.

The Disciplinary Committee will conduct the investigation in a manner appropriate in light of the circumstances of the case. Information gathered during the investigation will be used to evaluate the responsibility of the Respondent, provide for the safety of the Complainant and the College community, and take appropriate measures to end the prohibited conduct, prevent its recurrence, and address its effects. The investigation will include, as appropriate:

- A. Interview(s) with the Complainant;
- B. Interview(s) with the Respondent;
- C. Interview(s) with any other witnesses who may reasonably be expected to have any information relevant to the allegations;
- D. Consideration of any documentation or other information or evidence presented by the Complainant, Respondent, or any other witness that is reasonably believed to be relevant to the allegations.

The Respondent and Complainant will be provided equitable rights during the investigative process, including an opportunity to suggest relevant witnesses and other evidence to Disciplinary Committee during the investigation. Throughout the investigation, the Disciplinary Committee will keep the parties informed of the status of the investigation and the decision-making process as appropriate.

Both the Complainant and the Respondent have the opportunity to bring one (1) advisor of their choice to any interviews with members of the Disciplinary Committee and any related disciplinary proceedings, provided that the advisor is not a witness or otherwise involved in the investigation process. Advisors may provide emotional or other support to the Complainant or Respondent, but are not permitted to speak for the Complainant or Respondent, present evidence, question witnesses, or disrupt the process during any stage of the investigation. The College reserves its right to establish additional restrictions regarding the extent to which advisors may participate in any interviews and related disciplinary proceedings. Any such restrictions will be applied uniformly for both the Complainant and Respondent.

The Disciplinary Committee will seek to complete the investigation within sixty (60) days of the initial report, but this time frame may be extended for good cause, as determined by the Title IX Coordinator. In the event of such extension, the Title IX Coordinator shall provide written notice of the delay and the reason for the delay to both the Complainant and the Respondent. Good cause may include the complexity of the allegations, the number of witnesses involved, the availability of the parties or witnesses, the effect of a concurrent criminal investigation, any intervening College break or vacation, or other unforeseen circumstances. Best efforts will be made to complete the process in a timely manner by balancing principles of thoroughness and fundamental fairness with promptness.

In the event that allegation includes behavior or actions that are under review by law enforcement authorities, the Disciplinary Committee will assess and reassess the timing of the investigation under this policy, so that any criminal investigation is not compromised by the College's investigation. The College will cooperate with any law enforcement requests so as not to interfere with a concurrent investigation, but will ensure that law enforcement is aware of the College's obligations under Title IX where an extension is required under this policy.

At the conclusion of the investigation, the Disciplinary Committee shall make findings of fact, applying a preponderance of the evidence standard. The Disciplinary Committee will simultaneously provide the Complainant and Respondent with a written draft of the findings and will give both parties five (5) business days to submit a written response to the draft. The Disciplinary Committee will consider any written responses and may request additional information or evidence. Upon receipt of any additional information by the Complainant or Respondent, or after the five (5) day comment period has lapsed without comment, the Disciplinary Committee will prepare a final report, which shall include a determination based on findings of fact, as to whether a preponderance of evidence exists to support a finding that this Policy was violated. If this Policy or any other policy or Handbook provision is violated, the Disciplinary Committee shall include appropriate sanctions in its report.

The Disciplinary Committee will provide notice of the final outcome simultaneously to both the Complainant and the Respondent.

The final outcome will be provided simultaneously to the Complainant and the Respondent within five (5) business days and will outline any recommended measures to be taken to eliminate the prohibited conduct, prevent its recurrence, and address its effects. The Disciplinary Committee shall also provide copies of the College's appeals procedures.

Appeal

Both the Complainant and the Respondent may appeal the decision of the Disciplinary Committee to the College's Appeals Committee. Appeals must be submitted in writing within two (2) business days of the date of the final report. The written request must include an explanation of why the individual feels an appeal is warranted. The Appeal Committee, in its discretion, determines whether a hearing is necessary. If such a hearing is necessary, it will be arranged within a reasonable time, generally not to exceed ten days of the receipt of the notice of appeal.

The Appeals Committee will conduct all appeals in an impartial manner. Committee members who have a conflict of interest or actual bias shall be recused, as will the Title IX Coordinator if s/he is on the Committee. To replace recused members of the Appeals Committee for purposes of hearing an appeal, the President shall promptly appoint suitable individuals to hear the appeal.

The Appeals Committee will consider each appeal on a case-by-case basis and may consider a number of relevant factors, including, but not limited to:

- Any new information unavailable at the time of an investigation;
- Alleged procedural error(s) made during the original proceeding that affected the outcome; and/or
- Whether the Disciplinary Committee abused its discretion with regard to its findings of fact, its conclusions as to whether a violation occurred, and/or its determination as to sanction(s), if any.

The Appeals Committee can affirm or modify the findings, conclusions, or sanctions as appropriate.

The Complainant and Respondent will be notified simultaneously if an appeal results in any change to the result of the investigation, the sanctions or the remedial measures imposed within ten (10) business days from the date the appeal is received. In addition, the Respondent and Complainant will be notified simultaneously when the results become final.

Interim Protective Measures

Upon receipt of a complaint under this Policy, the Title IX Coordinator or designee may impose reasonable and appropriate interim measures designed to eliminate the reported hostile environment and protect the parties involved and/or other individuals as appropriate depending on the situation. The Title IX Coordinator or designee will maintain consistent contact with the parties to ensure that safety, emotional, and physical well-being concerns are being addressed. Interim measures may be imposed regardless of whether formal disciplinary action is sought by the complainant or the College. Potential measures, implemented on behalf of the complainant and/or the respondent to the extent reasonably available and warranted by the circumstances, include but are not limited to:

- Rescheduling of exams and assignments
- Imposition of a “no-contact order”
- Providing alternative course completion options
- Change in class scheduling, including the ability to transfer course actions or withdraw from a course without penalty
- Providing academic support services, such as tutoring
- Providing an escort to ensure safe movement between classes and activities
- Change in work assignment or schedule
- Change in supervisor or supervising assignment
- Interim suspension
- College-imposed administrative leave or separation

- Any other measure that can be tailored to the involved individual(s) to achieve the goals of this Policy

The College will also take into consideration and comply with any orders of protection, no-contact orders, or restraining orders that may be issued by other authorities.

The College may impose an interim (temporary) suspension pending resolution of a complaint whenever a student's conduct is perceived as threatening or potentially injurious to the well-being or property of members of the College community or the orderly functions of the College. While suspended, a student is not permitted to be on campus or to attend any official College event.

The Dean of Students or President may invoke immediate interim suspension if a student's behavior is perceived as threatening or potentially injurious to the College community.

Similarly, the College may impose leave or other discipline for any employee at the discretion of the President or designee, pending an investigation.

Sanctions and Monitoring

If a Respondent is found responsible for a violation of this or any other Policy or Handbook provision, the Disciplinary Committee will consider the imposition of a sanction(s) that is designed to eliminate the prohibited conduct, prevent its recurrence, and address its effects, while also supporting the College's education and Title IX obligations.

Respondents are expected to comply immediately with any sanctions or other corrective actions imposed by the Disciplinary Committee. Failure to comply may result in disciplinary action, up to and including dismissal from the College or termination of employment.

While sanctions may be of a punitive or disciplinary nature, they are also intended to be educational as well. Sanctions that may be taken for students found responsible for prohibited conduct under this Policy are:

- **Personal Accountability Requirements:** Assignment of personal duties, including, but not limited to, meetings with the College clergy members for the duration and frequency determined by the College, accountability meetings with the Title IX Coordinator, Dean of Students, or other appropriate administrator, assignment to anger management courses or other counseling sessions, where appropriate, and any other additional measures deemed appropriate by the Dean of Students.
- **Social Probation:** Amended curfew, no weekend pass privileges, etc.
- **Suspension:** Denial of the opportunity to attend classes at the College for a specified time or indefinitely. Students continue to live in residence halls and attend meals on campus, but are not allowed to participate or attend College activities.
- **Dismissal:** Denial of the opportunity to continue at the College, for a specified time or indefinitely. Students are not permitted to remain in the residence halls and must vacate within 24 hours.
- **Disciplinary Duties:** Assignment of extra duties including, but not limited to, written letters of apology, written assignments, change in curfew, no weekend pass privileges except to the home(s) of parents/guardians, campus clean-up, and any other additional duties deemed appropriate by the Dean of Students.
- **Educational Sanctions:** Assignment of additional educational duties including, but not limited to, mandatory education and training, counseling assessment, adherence to professional counseling recommendations, research papers or projects, etc.
- **College Housing Restriction:** Residence re-assignment, removal and/or prohibition from College housing.

- No-Contact Order: Requirement to comply with restrictions in behavior designed to minimize contact between the Respondent and Complainant to the extent possible.

Consistent with its policies and procedures under the Family Educational Rights and Privacy Act (FERPA), the Clery Act, the Campus SaVE Act, Title IX, and state and federal law, the College reserves the right to notify the parents/guardians of dependent students regarding any conduct situation that involves disciplinary probation, loss of housing, suspension, and/or dismissal of the dependent student.

Amnesty

The College strongly believes that sexual misconduct has no place on its campus. The College understands that other violations of the College's Student Code of Conduct may occur at or near the time of the commission of prohibited conduct under this Policy. As a result, the College will consider, on a case-by-case basis, granting limited immunity to reporting students who may have violated the Code of Conduct at the same time an incident(s) of prohibited conduct occurred, provided that the reporting student's behavior did not harm or cause risk of harm to other individuals in the College community. For example, students can report incidents of Dating Violence without fear of discipline for dating as it is prohibited under the Code of Conduct. Students should not let their own behavior be a deterrent to reporting an incident under this Policy and the College encourages all students to report incidents of prohibited conduct to an appropriate staff member as soon as possible.

However, in deference to its unique social expectations, the College reserves the right to determine the appropriate response to such violations, which may imposition of educational or therapeutic remedies including, but not limited to, the personal accountability, disciplinary duties, or educational sanctions outlined above in Section XII of this Policy.

Students who seek limited immunity in bad faith or otherwise make a false report under this Policy, will be subject to appropriate discipline, up to and including dismissal from the College.

Retaliation

No member of the College community shall retaliate, intimidate, threaten, coerce or otherwise discriminate against a person who files a complaint, serves as a witness, or assists or participates in a proceeding in any manner. Participants who experience retaliation should report the incident immediately to the Dean of Students.

Education and Prevention Programs

The College is committed to prevention of prohibited conduct through education and awareness programs. Throughout each academic year, the College offers educational programs to promote awareness of prohibited conduct, including sexual assault, stalking, dating violence, and domestic violence. The Title IX Coordinator, in consultation with other appropriate individuals and/or organizations, shall assist in coordinating such programs.

The College offers comprehensive, intentional and integrated programming, initiatives, strategies, and campaigns intended to end sexual assault, stalking, dating violence, and domestic violence that are (a) culturally relevant, inclusive of diverse communities and identities, sustainable, responsive to community needs, and informed by research or assessed for value, effectiveness, or outcome; and (b) consider environmental risk and protective factors as they occur on the individual, relationship, institutional, community, and societal levels. These training programs will include:

- A statement that College prohibits sexual misconduct, stalking, and domestic and dating violence;
- The definitions of sexual misconduct, stalking, and domestic and dating violence, under College policy and state law;
- The definition of consent in reference to sexual activity under College policy and state law;
- A description of safe and positive options for bystander intervention;

- Information on risk reduction;
- Information of disciplinary procedures related to sexual misconduct, stalking, and domestic and dating violence;
- A description of the College's drug and alcohol-abuse education programs.

All continuing students and staff will receive regular opportunities to review this information, become acquainted with new policies and best practices, and practice key skills. All training, as well as information provided, will be age and content appropriate.

Clery Act Reporting

Originally known as the Campus Security Act, the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act (the "Clery Act") is the federal law that requires institutions participating in federal financial aid programs to disclose information about crime on and around their campuses. Clery reporting must be submitted to the U.S. Department of Education for certain offenses that have been reported at campus locations. The information contained in the annual Clery report tracks the number of Clery reportable offenses occurring and does not include the names or any other identifying information about the persons involved in such incidents. In addition, the College may be obligated to issue timely warnings to appropriate members of the College Community about emergency situations or crimes that pose a serious or continuing threat to safety. With regard to such timely warnings, the names and other identifying information of victims will be withheld as confidential.

All proceedings under this policy are conducted in compliance with the requirements of the Family Educational Rights and Privacy Act (FERPA), the Clery Act, Title IX, and state and federal law. No information shall be released from such proceedings except as required or permitted by law and College policy.

MISSING STUDENT

General Requirement -- The Federal law under (34 CFR 668.4 6) requires that an institution that provides any on-campus student housing facilities must include a statement of policy and procedures regarding missing student notification. This statement will help fulfill this requirement and provide important information on how the campus community should respond to these matters.

General Notification Procedures -- If an on-campus resident student is assumed to be missing, the individual making this assumption should immediately follow the procedures outlined.

1. Contact the VCC Campus Safety & Security office at extension 406, 407 or 538 from a campus phone to make a report, or call (614) 382-1159. These numbers operate on a 24/7 basis.
2. The Campus Safety & Security personnel receiving the notification will immediately contact the necessary persons, including, but not limited to:
 - The missing student's Resident Director
 - The Director of Student Housing
3. Likewise, if an on-campus resident student is assumed to be missing and the individual making this assumption contacts a member of the Student Life staff, the staff member will immediately contact Campus Safety & Security and other necessary individuals as indicated in item #2.

Specific Procedures -- These scenarios represent the majority of missing person cases involving resident students that may be reported on our campus.

Student missing less than 24 hours – with no known emotional/mental health, medical problems or suspicions of foul play:

In cases where no known factors as indicated above are prevalent there will only be a preliminary fact gathering inquiry. The Resident Director should periodically contact friends and or other relevant persons who may be aware of their whereabouts over the next 24 hour period, in an attempt to locate the student. The Campus Safety & Security Department should be contacted for awareness purposes and to determine if further action should be considered.

Student missing 24 hours or more – regardless of known emotional/mental health, medical problems or suspicions of foul play:

If the person missing is still not located within 24 hours, Campus Safety & Security Department and Dean of Students will launch a thorough investigation and contact the Columbus Police Department. The investigation may include, but will not be limited to, contacting friends and family of the individual for assistance and information, searching College property and the local geographic areas such as the village and local parks, sending out an all-points bulletin through the police, etc. (see next scenario for further search details).

Student missing less than 24 hours – with known emotional/mental health, medical problems or suspicions of foul play:

If the person missing has any of these factors present, this may make them a threat to themselves or others and an immediate attempt to locate the missing student must be made. The investigation should include the following positions and/or departments:

- Campus Safety & Security Department
- Columbus Police Department
- Resident Director
- Director of Student Housing
- Director of Student Life

The investigation may include, but will not be limited to, contacting friends and family of the individual by **using the student's emergency contact number for assistance and information**, searching the College property and local geographic areas such as the community and local parks, and sending out an all-points bulletin through the police.

Additional resources to assist in locating the student may also include:

- Going back to the student's room or resident hall to make sure that they have not returned to the location.
- Talking to the student's RA, roommate, and floor mates to see if anyone can confirm the missing student's whereabouts and/or confirm the date, time, location the student was last seen.
- Secure a current photo of the student.
- Call and text the student's cell phone.
- Send the student an e-mail.
- Check all possible locations mentioned by the parties above including, but not limited to, library, residence hall lounges, student common areas, fitness center, etc.
- Contact or call any other on-campus or off-campus friends or contacts that are made known. This could include checking a student's social networking sites such as MySpace, Face book and Twitter.
- Assess the student's VCC computer and student account by working with Computer Services to determine any recent activity on it.
- Ascertain the student's car make, model and license plate information. Campus Safety & Security will check campus parking lots for the presence of the student's vehicle.

CRIME STATISTICS

The statistics provided are in compliance with the Federal Crime Awareness and Campus Security Act of 1990 and all subsequent amendments and are for your information as part of the overall safety and security program. This data reflects disclosure of certain incidents, as required by the law, that are reported to campus security authorities or local police agency (Columbus Police Department) for the three calendar years preceding the year in which the report is disclosed.

Statistics of crimes reported to pastoral or professional counselors are generally not included in this report, unless it is deemed appropriate to inform their clients of any procedures to report crimes on a voluntary, confidential basis for inclusion in the annual disclosure.

Crime Classification	Year	On Campus	On Campus Residential	Non Campus	Public Property	Unfounded
Murder/Non-negligent manslaughter	2015	0	0	0	0	0
	2016	0	0	0	0	0
	2017	0	0	0	0	0
Negligent manslaughter	2015	0	0	0	0	0
	2016	0	0	0	0	0
	2017	0	0	0	0	0
Sex Offenses						
Rape	2015	0	0	0	0	0
	2016	0	0	0	0	0
	2017	0	0	0	0	0
Fondling	2015	0	0	0	0	0
	2016	0	0	0	0	0
	2017	0	0	0	0	0
Incest	2015	0	0	0	0	0
	2016	0	0	0	0	0
	2017	0	0	0	0	0
Statutory Rape	2015	0	0	0	0	0
	2016	0	0	0	0	0
	2017	0	0	0	0	0
Robbery	2015	0	0	0	0	0
	2016	0	0	0	0	0
	2017	0	0	0	0	0
Aggravated Assault	2015	0	0	0	0	0
	2016	0	0	0	0	0
	2017	0	0	0	0	0
Burglary	2015	0	0	0	0	0
	2016	0	0	0	0	0
	2017	0	0	0	0	0

Motor Vehicle Theft	2015	0	0	0	0	0
	2016	0	0	0	0	0
	2017	0	0	0	0	0
Arson	2015	0	0	0	0	0
	2016	0	0	0	0	0
	2017	0	0	0	0	0

Drug, Alcohol and Weapons	Year	On Campus	On Campus Residential	Non Campus	Public Property	Unfounded
Weapons Law Arrests	2015	0	0	0	0	0
	2016	0	0	0	0	0
	2017	0	0	0	0	0
Drug Law Arrests	2015	0	0	0	0	0
	2016	0	0	0	0	0
	2017	0	0	0	0	0
Liquor Law Arrests	2015	0	0	0	0	0
	2016	0	0	0	0	0
	2017	0	0	0	0	0
Weapons Law Referrals	2015	0	0	0	0	0
	2016	0	0	0	0	0
	2017	0	0	0	0	0
Drug Law Referrals	2015	0	0	0	0	0
	2016	0	0	0	0	0
	2017	0	0	0	0	0
Liquor Law Referrals	2015	0	0	0	0	0
	2016	0	0	0	0	0
	2017	0	0	0	0	0

Hate Crimes	Year	On Campus	On Campus Residential	Non Campus	Public Property	Unfounded
Bias related	2015	0	0	0	0	0
	2016	0	0	0	0	0
	2017	0	0	0	0	0
Gender identity	2015	0	0	0	0	0
	2016	0	0	0	0	0
	2017	0	0	0	0	0
National origin	2015	0	0	0	0	0
	2016	0	0	0	0	0
	2017	0	0	0	0	0

VAWA Crimes	Year	On Campus	On Campus Residential	Non Campus	Public Property	Unfounded
Domestic Violence	2015	0	0	0	0	0
	2016	0	0	0	0	0
	2017	0	0	0	0	0
Dating Violence	2015	1	1	0	0	0
	2016	0	0	1	0	0
	2017	0	0	0	0	0
Stalking	2015	0	0	0	0	0
	2016	0	0	0	0	0
	2017	0	0	0	0	0

CRIME DEFINITIONS

Aggravated Assault; An unlawful attack by one person upon another for the purpose of inflicting severe or aggravated bodily injury. This type of assault usually is accompanied by the use of a weapon or by means likely to produce death or great bodily harm.

Arrests for drug abuse, liquor law, and weapons violations must be reported.

- Drug abuse violations are violations of laws prohibiting the production, distribution, or use of certain controlled substances and associated equipment; unlawful cultivation, manufacture, distribution, sale, purchase, use, possession, transportation or importation of any controlled drug or narcotic; and arrests for violations of state and local laws the relating to the unlawful possession, sale, use, growing or manufacturing and making of narcotic drugs.
- Liquor law violations are defined as violations of laws or ordinances prohibiting the manufacture, sale, possession, transporting, or furnishing of intoxicating liquors or alcoholic beverages; and all attempts to commit any of the aforementioned. (Public drunkenness and driving under the influence are not included).
- Weapons violations are violations of laws or ordinances dealing with weapon offenses, such as: manufacture, sale, or possession of deadly weapons; carrying of deadly weapons, concealed or openly; furnishing deadly weapons to minors; aliens possessing deadly weapons and all attempts to commit any of these acts.

Arson: Any willful or malicious burning or attempt to burn, with or without intent to defraud, a dwelling, public building, motor vehicle or aircraft, personal property of another, etc.

Burglary: The unlawful entry of a structure to commit a felony or a theft. Theft or unlawful entry into open-access areas, such as dining halls and libraries, is not burglary. As structure is a physical space enclosed by four walls, with a roof and door, and so does not include lockers, tents, or cars, for example. Shoplifting is not burglary.

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 at these offenses.

Dating Violence: Defined previously.

Domestic Violence: Defined previously.

Hate crimes: Are defined for Clery Act purposes as certain crimes committed against a person or property when such crimes are motivated, in whole or in part, by the offender's (perpetrator's) bias. Bias is defined as a performed negative opinion toward a group of persons based on their race, gender, religion, ethnic/national origin, disability, sexual orientation or gender identity. These crimes are:

- murder and non-negligent manslaughter,
- forcible and non-forcible sex offenses,
- robbery,
- aggravated assault,
- burglary,
- motor vehicle theft,
- arson,
- larceny-theft,
- simple assault,
- intimidation (unlawfully placing another person in reasonable fear of bodily harm through the use of threatening words and/or other conduct but without displaying a weapon or subjecting the victim to actual physical attack), and
- destruction/ damage/ vandalism to property.

Motor Vehicle Theft: Is defined as 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; includes joyriding.) Motor vehicle is defined broadly to include not only cars and trucks but any self-propelled vehicle that runs on land surface and not on rails, such as golf carts, motor scooters, motorized wheelchairs, and ATVs.

Murder and Non-negligent Manslaughter: The willful (non-negligent) killing of one human being by another.

Negligent Manslaughter: Is the killing of another person through gross negligence.

Robbery: The taking or attempting to take anything of value from the care, custody, and control of a person or persons by force or threat of force or violence and/or by putting the victim in fear.

Sex Offenses: A sex offense is any of the following:

- Rape - The penetration, no matter how slight, of the vagina or anus with any body part or object, or oral penetration by a sex organ of another person, without the consent of the victim.
- Fondling - The touching of the private body parts of another person for the purpose of sexual gratification, without the consent of the victim.
- Incest—Sexual intercourse between persons who are related to each other within the degrees wherein marriage is prohibited by law.
- Statutory Rape—Sexual intercourse with a person who is under the statutory age of consent. In Ohio, the age of consent is 16.

Stalking: Defined previously.

Examples include, but are not limited to, repeatedly following such person(s), repeatedly committing acts that alarm, cause fear, or seriously annoy such other person(s) and that serve no legitimate purpose, and repeatedly communicating by any means, including electronic means, with such person(s) in a manner likely to intimidate, annoy, or alarm him or her.

CONSENT

Affirmative consent is a clear, unambiguous, knowing, informed, and voluntary agreement between all participants to engage in sexual activity. Consent is active, not passive. Silence or lack of resistance cannot be interpreted as

consent. Seeking and having consent accepted is the responsibility of the person(s) initiating each specific sexual act regardless of whether the person initiating the act is under the influence of drugs and/or alcohol. Consent to any sexual act or prior consensual sexual activity between or with any party does not constitute consent to any other sexual act. The definition of consent does not vary based upon a participant's sex, sexual orientation, gender identity or gender expression. Consent may be initially given but withdrawn at any time. When consent is withdrawn or cannot be given, sexual activity must stop. Consent cannot be given when a person is incapacitated. Incapacitation occurs when an individual lacks the ability to fully, knowingly choose to participate in sexual or intimate activity. Incapacitation includes impairment due to drugs or alcohol (whether such use is voluntary or involuntary), the lack of consciousness or being asleep, being involuntarily restrained, if any of the parties are under the age of 16, or if an individual otherwise cannot consent. Consent cannot be given when it is the result of any coercion, intimidation, force, or threat of harm.

CONCLUSION

This Annual Security Report is a requirement and we take satisfaction in the minimal number of reported crimes; however, we willingly seek the challenge of assuring a safe and secure atmosphere for our students, employees, and persons who may visit our College. We attempt to accomplish this by providing ample security, emergency notification, reporting procedures, and timely response to issues that might arise. As we review the statistical tables we are not satisfied with the significant number of "zeros" found in most of the categories shown; our goal will always be to provide the safest environment possible for our College community. As we strive to achieve this goal, we feel somewhat confident that our College community is very safe and therefore able to enjoy the experience of being at Valor Christian College.

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