

ANNUAL SECURITY REPORT
and
ANNUAL FIRE SAFETY REPORT
for 2020



COVENANT
COLLEGE

IN ALL THINGS CHRIST PREEMINENT

Introduction

The Clery Act requires all institutions of higher education to publish an annual report of security policies and crime statistics. The Higher Education Opportunity Act of 2008 also requires an annual report containing information on campus emergency response and evacuation procedures, emergency notification, additional hate crime reporting and fire safety policies and statistics. Information contained in this report was obtained from all relevant campus authorities. The report is due by October 1st of each year and must contain certain crime statistics for the most recent three-year reporting period.

The purpose of this publication is to:

- Provide crime statistics required by the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act
- Inform current and prospective students, staff, faculty and visitors about the College's policies and programs designed to help keep them safe
- Share information regarding emergency preparedness and planning

The Annual Fire Safety Report for 2020 is included with this report.

Background

In November of 1990, the Student Right to Know and Campus Security Act (Public Law 101-542) was signed into law. This Act represents a legislative response to the perceived problem that some colleges and universities had been less than forthright about disclosing various policies and statistics which are of interest to members of the college or university community and to prospective students, parents and/or employees of that institution. Title I of the Student Right to Know and Campus Security Act required that institutions complete and distribute upon request graduation rates of students, particularly those receiving athletic scholarships. Title II required institutions to make security policies and campus crime statistics available to interested parties. Title III of the Act made the same requirements regarding the institution's default rates for student loans.

In July 1992, the Higher Education Amendments of 1992 (HEA) were enacted. The HEA imposed new requirements for preventing, reporting, and investigating sex offenses that occur on campus.

In July of 1999, the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act was enacted. This act broadened the list of reportable crimes and imposed new reporting requirements for crimes, the location of those crimes, and authorities that have to report those crimes.

Compliance

Preparation of this report is the responsibility of Covenant College's Safety and Security Department. This report is made available to all current students and employees via email on an annual basis. The report is also made available online on the college's website. Printed copies are available upon request from the Safety and Security Department.

Covenant College has always practiced a spirit of open disclosure in its policies and practices and is pleased to make this compilation of security policies and campus crime statistics available. If, after reading this report, you have other comments or questions please address them to:

Keith McClearn

Director of Safety and Security

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Part One: The Annual Security Report

A. Campus Security Overview

Covenant College Safety and Security Department

The mission of the Safety and Security Department is to protect the personnel and property of Covenant College, maintain the security and integrity of the campus, and offer assistance where needed in order to care well for the campus community. The department is composed of a director, a coordinator, two full-time and a number of part-time Campus Security Officers.

In addition to campus security, this department is responsible for additional aspects of campus life including issuing student and employee identification cards (called ScotsCards), management of keys and key cards and with the supporting software applications, management of the College's network of surveillance cameras, parking policy and enforcement, liaison with local law enforcement, and other duties.

The Safety and Security Department provides a Campus Security Officer on duty 24/7. These officers patrol the campus to assist students, faculty, staff, and visitors with all safety and security matters. They also have authority to enforce Covenant College's parking regulations. No Safety and Security Department employees have police arrest authority, but can assist local law enforcement officers in the performance of their duties.

During the academic year, the College also utilizes Safety and Security Student Guards who work in conjunction with the contracted guard service. These Student Guards are on duty throughout the day as they are available. Additionally, they are on duty each evening from 6:00 pm until 12:30 am (or later), seven nights a week. The mission of the Student Guards is to assist the Campus Security Officers in caring for the student population and maintaining a safe campus environment. Their duties include patrolling the campus in the Campus Security vehicle, shuttling students to and from South Campus, helping with disabled vehicles, securing buildings, and reporting unusual or suspicious behavior on campus.

The Safety and Security Department's daytime phone number is (706) 419-1229. The after hours number is (423) 593-1403.

Police Jurisdiction

Concerning police jurisdiction, the campus is located within the jurisdiction of the Dade County Sheriff's Office. (Despite the college's Lookout Mountain, Georgia address, the college does not sit within the city limits of the local police department of Lookout Mountain, Georgia.) As such, the Dade County Sheriff's Office has full authority on campus to make traffic stops, conduct criminal investigations, execute arrests or intervene as necessary in accordance with state and municipal laws. Any crimes occurring on campus may be referred to the Dade County Sheriff's Office for investigation and potential prosecution.

Dade County is situated in Georgia's most extreme Northwest corner and consists of 173 square miles. The county seat of Trenton is located eleven (11) miles from the Covenant College campus.

B. Reporting Crime and Other Emergencies on Campus

The campus community is encouraged to call 911 for any and all life-threatening or serious medical emergencies, or when they witness criminal acts or any suspicious activity on campus. The campus is also advised the most direct

way to “call 911” is to call the Dade County Emergency Services Department at (701) 657-4111. For all other types of assistance, the campus may contact the Safety and Security Department during business hours by calling (706) 419-1229, or by calling the Department’s after hours number at (423) 593-1403. Off campus residents should immediately contact the Dade County Sheriff’s Office for assistance.

Students are instructed through the Student Handbook, Residence Hall Manual, and various orientation sessions to report all crimes to their person or property to Residence Life, Student Development, or Safety and Security staff. Likewise, the Covenant College Staff Manual and Employee Handbook instructs all employees (please see following section) to report crimes to their person or property on campus to the Safety and Security Department. Any instance or allegation of a crime or other emergency involving any student will also initiate an automatic response from campus personnel for counseling and/or victim support services.

The Role of each Responsible Authority

Covenant College has designated all employees as “Responsible Authorities”.

Responsible Authority is an umbrella term used to encompass both Responsible Employees under the College’s Title IX policy (also referred to as officials with authority to take action) AND Campus Security Authorities under the Clery Act.

If you are an employee of Covenant College, you are a “Responsible Authority.” This includes Resident Assistants.

Simply put, this means you must report certain crimes to the College. It is not necessary that you gather more information about an incident, that you know for certain if an allegation is in fact true, or even if it is a crime reportable under the Clery Act or Title IX. It is only required that you report what you know and that you should report the possible crime as soon as you become aware of it.

All Covenant College employees are requested to watch the short training module entitled Responsible Authority Proficiency in Incident Disclosure:

<https://csa-training-articulate.s3.us-east-2.amazonaws.com/covenantcollegecsatraining2021/story.html>

To report information pertaining to a crime or policy violation at Covenant College, please use the following:

Title IX Coordinator - Brad Voyles: (706) 419-1107

brad.voyles@covenant.edu

Title IX Deputy Investigator - Jon Wylie: (706) 419-1108

jon.wiley@covenant.edu

Title IX Deputy Coordinator for Students - Becca Moore: (706) 419-1262

becca.moore@covenant.edu

Title IX Deputy Coordinator for Employees - Tom Dewey: (706) 419-1105

tom.dewey@covenant.edu

Title IX Deputy Investigator - Nesha Evans: (706) 419-1106

nesha.evans@covenant.edu

Director of Safety and Security - Keith McClearn: (706) 764-7480 (cell)
keith.mcclearn@covenant.edu

Safety and Security: (706) 419-1229
Safety and Security 24/7 Guard Phone: (423) 593-1403

C. Crime Prevention Programs/Safety Awareness

Covenant College is situated in a fairly isolated, residential community. The majority of Covenant's students reside in campus housing. Orientation and information programs for all resident students are held at the beginning of each semester. These programs include information about safety on campus.

All student and employee vehicles on campus are required to be registered with Safety and Security. When registering a vehicle on campus, vehicle owners are referred to the college's parking regulations which are posted online. These regulations include safety precautions for those that operate vehicles on campus.

The Office of Student Development is responsible for determining whether and how college students and employees will be notified of violent crimes that have been reported to the police and/or to campus security authorities. Such information will be disseminated in ways appropriate given the particular circumstances of each incident.

See Something, Say Something

All members of the Covenant College community are encouraged to aid in maintaining a safe and secure campus by reporting any suspicious or unethical behavior, abusive relationships, sexual violence, or potential criminal conduct to the Safety and Security Department. This may be done easily (and anonymously if desired) via the See Something, Say Something link on the Safety and Security website, www.covenant.edu/security.

Prevention of Violence

The Safety and Security Department's website seeks to educate all members of the campus community regarding potential signs and signals potentially displayed before an act of violence occurs. The Department invites all employees, students, and concerned persons to view the 2+ minute video entitled "Evan" produced by Sandy Hook Promise by clicking on the following link shown below at <https://www.youtube.com/watch?v=A8syOeFtBKc>.

Further, the website encourages any interested person to visit the Sandy Hook Promise website at www.sandyhookpromise.org for more information relating to preventing gun violence and other tragedies.

Criminal actions or campus incidents are to be recorded in the Daily Crime Log. The Daily Crime Log is maintained in the Safety and Security Department and is available to the public upon request.

The Safety and Security Department regularly invites the Georgia Emergency Management Agency to campus to conduct emergency preparedness training (including active shooter and fire emergency training) to all members of our campus community. These presentations have been given to each segment of the campus including staff, faculty, student leadership, and the student body. For 2019, the training was offered on 9/9 and 9/10. The student body as well as interested staff and faculty members were encouraged to attend. This training was mandatory for all Resident Assistants.

The Student Senate and the Safety and Security Department co-hosted Women's Self-Defense training on campus on 11/14/2019. The training focused on self-defense tactics including risk reduction, awareness, and defense against rape and other crimes. Twenty-seven students attended.

Threat Assessment and Management Team

Covenant College has a Threat Assessment and Management Team (TAMT) that is committed to improving community safety. The TAMT assists in managing situations that pose, or may reasonably pose, a threat to the health, safety, and well-being of the campus community. Through a proactive and collaborative approach, the TAMT seeks to identify, assess, intervene, and manage disruptive or threatening situations or individuals. The threat assessment process encourages early intervention to manage individuals whose behavior potentially impedes their own or others' ability to function successfully or safely.

It is the responsibility of each member of the campus community to immediately report any situation or circumstance that could possibly result in harm to anyone at the College. This may include a troubling or troubled person, suspicious or unethical behavior, an abusive relationship, sexual violence, threats, potential criminal conduct, or any circumstance that is causing serious anxiety, stress, or fear to anyone. For the safety of the campus community, any threat, explicit or implied, will be considered a statement of intent.

Bringing information to the attention of the Threat Assessment and Management Team may be accomplished by contacting (or by submitting a report) to any of the following:

Student Development:	706 419-1107
RD on Duty:	706 450-7001
Human Resources:	706 419-1138
Safety and Security 24/7:	426 593-1403

See Something/Say Something @ www.covenant.edu/security (Can be made anonymously.)

In situations where a person or persons may pose an immediate risk of violence to self or others, all members of the campus community are asked to contact 911 AND Covenant College Safety and Security.

Information provided to the TAMT will be treated as confidential and will be protected in accordance with FERPA and other applicable laws and administrative rules, and will be released only as required by law or permitted by law under exigent circumstances.

The Threat Assessment and Management Team reviews information and reports concerning troubling or troubled students as well as disruptive, inappropriate, and/or threatening behavioral situations reported by faculty, administrators, staff and students, as well as external sources.

The TAMT will initiate response to incidents of violence, threatening behavior, stalking, unwanted pursuit, harassment, and any behavior indicating a student poses a risk to self or others.

The TAMT will seek to identify resources for troubled students and personnel and make referrals to appropriate campus resources and off campus agencies, as well as help secure therapeutic actions that are appropriate such as treatment or counseling. This may include internal or external psychological evaluations. When necessary, the

TAMT may initiate contact with appropriate authorities to place a student in the custody of law enforcement or a mental health facility capable of supporting specific behaviors

When necessary, Student Development will authorize, within FERPA guidelines, notification of parents, guardians, and/or next of kin. The TAMT will meet both on a regular schedule AND on an emergency basis.

The Threat Assessment and Management Team is comprised of the following individuals:

Dean of Students (Chairperson)
Associate Dean of Students for Residence Life
Associate Dean of Students, Student Life
Coordinator for Student Success
Director of Human Resources
Director of Health Services
Director of Safety and Security

Depending on the situation, the above may be supplemented by members of the Students of Concern Committee, Resident Directors, faculty, coaches, and/or others with areas of specialization/ responsibility.

When appropriate, the TAMT will Investigate allegations and incidents to determine if intervention is necessary and make appropriate recommendations. The TAMT will recommend actions to protect the students, employees and other members of the campus community. Recommended actions may include, but are not limited to, counseling, involuntary withdrawal, suspension, expulsion, filing of criminal charges, or ongoing monitoring for follow-up and observation of behaviour patterns.

The TAMT may initiate an involuntary withdrawal when a student exhibits behavior that could disrupt the academic process or present a danger to the student or other members of the campus community. This policy may also apply to any student returning from a hospital confinement who needs extended observation or supervision. The following are some situations in which such action would be appropriate:

1. The student's behavior appears to pose a danger to the life, health, or safety of the student or other members of the College community, or to the College, its property, or to the property of another member of the College community.

2. The student's disruptive behavior impedes or aggressively disrupts the educational process or the legitimate activities of other members of the College community.

3. The student refuses or is unable to cooperate with a recommended evaluation or treatment procedure, and/or the student acts or threatens to act in a manner that would interfere with or disrupt the educational process or the legitimate activities of other members of the campus community.

A student who fails to cooperate with either the evaluation process or with the conditions set for his/her continuance at the College may be suspended on a summary basis as noted above.

In cases where it is believed that the student's behavior poses a danger of causing imminent harm to self or others, the student may be summarily suspended or dismissed from the College immediately. Typically, in such cases, appropriate medical and law enforcement agencies, as well as family members, will be notified. The evaluation process should then take place following the student's suspension and removal from campus.

Covenant College prohibits retaliation against persons who in good faith provide information or cooperate in an investigation. The College also prohibits the filing of knowingly false or misleading reports and providing knowingly false or misleading information in an investigation.

Safety Presentations

Covenant College requires all student workers and all freshmen to annually complete safety awareness training. This training is available online.

D. Emergency Notification and Timely Warning Procedures

The Department of Safety and Security, working under the supervision of Student Development, is responsible for both emergency notifications and timely warnings. A variety of dissemination methods are used to communicate these messages. They include text messages, email messages, phone calls, siren alerts, and social media.

Emergency Notifications

In the event of a significant emergency or dangerous situation involving an immediate threat to the health and safety of students or employees, including the necessity to evacuate the campus, upon confirmation the College will immediately disseminate this information to the campus community. In the event that an evacuation of the campus is necessary, students and employees will be directed to a safe location.

The only reason the College will not issue a notification for a confirmed emergency or dangerous situation would be that if doing so would compromise efforts to a) assist a victim, b) contain the emergency, c) respond to the emergency or d) otherwise mitigate the emergency.

ScotsAlerts

The College's emergency notification system messages are referred to as ScotsAlerts. The College has contracted with Omnilert, a critical and emergency communications software company, for rapid notification to the college community when necessary. ScotsAlerts are rapidly-sent important messages for all members of the Covenant community. In addition to emergency notifications, ScotsAlerts are also used to notify the Covenant community about other potential hazards, campus closings, inclement weather, or other critical information.

The Covenant email accounts of students, faculty, and staff are automatically registered for email notifications via ScotsAlerts. In addition, we encourage each campus community member to register for any or all of the following message options:

- Text Messages
- Additional email account
- Phone call (landline or mobile)

A texted version of a ScotsAlert message is always limited to a defined number (159) of characters. An emailed version of a ScotsAlert message is not and will likely contain more information.

Covenant College routinely participates in emergency tests of the ScotsAlert system and the public address system. There is no charge to register for and receive ScotsAlert messages. Campus community members' participation and subscription information is private and will not be shared.

ScotsAlerts may be activated by the Safety and Security Department or by the Office of Student Development. ScotsAlerts used for emergency notifications will issue a warning to the community to take immediate and appropriate action to prevent a potential life threatening event from occurring.

Once activated, ScotsAlerts are also communicated directly to the College's Facebook and Twitter accounts.

Campus Siren System and Tones

In addition to ScotsAlerts, the college also has the capability when necessary to broadcast emergency notifications over the College's public address system. In the event of a significant emergency or dangerous situation involving an immediate threat on campus, the College may choose to broadcast one of two messages via the public address system.

For a weather emergency such as a tornado warning, the on campus siren will broadcast the standard mass alert "Wail" tone. (A recording of the "Wail" tone is available on the College's Safety and Security Website at <https://www.covenant.edu/students/safety/scotsalert#campusalert>.) When hearing this tone, all members of the campus community should immediately seek shelter in the nearest Tornado Evacuation Zone. These Tornado Evacuation Zones are illustrated on signage throughout the campus.

For an emergency involving an imminent threat on Covenant College, the on campus siren will broadcast the standard mass alert "Hi/ Low" tone. (A recording of the "Hi/ Low" tone is available on the College's Safety and Security Website at <https://www.covenant.edu/students/safety/scotsalert#campusalert>.) Examples of immediate or imminent threats on campus could be an active shooter or other armed intruder, a terrorist attack, a bomb threat, explosion, civil rioting, or a chemical or hazardous spill.

For either a weather emergency or an imminent threat on campus, the siren will sound intermittently only. When the siren stops, this does NOT indicate the threat of harm has ended.

For other emergency situations, the College may broadcast pre-recorded emergency announcements or live announcements over its public address system.

When hearing the siren or other public address announcement, all members of the campus community should consult their most readily available ScotsAlert outlet for more detailed information. As previously stated, a texted version of a ScotsAlert message is always limited to a defined number of characters. An emailed version of a ScotsAlert message will likely contain more information.

The "All Clear" Signal/ After the Emergency

At Covenant College, the "All Clear" signal will always be communicated by ScotsAlert and/or email announcement. Please remember that when used, the end of the siren does not always mean the threat or campus emergency has ended.

If the emergency was that of a severe weather incident, be mindful it may have caused damage to the campus or the surrounding community. Be aware of falling or fallen debris and power line hazards.

Students should consider calling parents and friends to assure them they are okay and to inform them of their whereabouts. It is always advisable to quickly text your RA for accountability and to “check in” for instructions following the emergency.

Timely Warnings

Timely Warnings are messages sent to the campus community to warn of potentially dangerous criminal situations. The College will send out timely warnings to inform the campus community concerning crimes that have occurred on or near campus that represent an ongoing threat. These timely warnings will be sent as soon as pertinent information is available. The Department of Safety and Security is responsible for sending timely warnings, which may be sent using a variety of dissemination methods.

Emergency Response Team

The College has established an Emergency Response Team (ERT) composed of individuals from a variety of disciplines across campus to address a wide array of potential emergency situations. The mission of the ERT is to help ensure the safety and general welfare of all members of the campus community. This committee is chaired by the Vice President for Student Development.

Members of the Emergency Response Team are:

Vice President for Student Development

Director of Health Services

Director of Human Resources

Dean of Academic Programs

Director of Technology Services

Associate Dean of Students for Residence Life

Campus Architect

Director of Facilities Management

Director of Marketing and Communications

Director of Business Services

Facilities Management Coordinator

Director of Safety and Security

As the crisis dictates, the Vice President of Student Development may add other individuals to this team to address specific needs.

Emergency Response and Evacuation

The College has designated the members of the Emergency Response Team, as listed above, as those individuals responsible for determining whether an emergency or dangerous situation exists that involves an immediate threat to the health or safety of students or employees on campus and to what extent the campus community will be notified. Each of these individuals has the authority to initiate emergency notifications.

If evacuation of a segment of the campus, or the entire campus is necessary, the College will initiate the emergency notification to evacuate. In this event, members of the campus community will be directed to a safe location.

Media liaison

During emergencies, the College's Marketing and Communication Office is responsible for responding to all public inquiries, including requests for information from the media.

Emergency Medical Services

As previously stated, if emergency medical services are required during the College's normal business hours, the Priesthill Center staff will both respond to provide treatment and coordinate care with local First Responders and other health care providers and medical facilities.

For after hours medical (and fire emergencies), our campus is supported by the local volunteer fire department. In addition, Dade County has contracted for ambulatory services that will also respond to calls for assistance from campus.

Student volunteers, as part of the College's First Responder Program, participate in the local volunteer fire department (i.e. West Brow Fire and Rescue). These student volunteers, having completed the prerequisite training requirements, are often among the first to respond to medical and fire emergencies on campus and in the surrounding community. Because of this program, the response time for these type services is greatly reduced.

Fires and Fire Alarms

For the College's emergency action plans in the event of a fire, please see Annual Fire Safety Report, beginning on page 35.

E. Campus Facilities Security and Access

Covenant College has an open "private" campus. As a result, access to campus facilities is not limited to members of the campus community. The South Campus Road (i.e. the route to the baseball and intramural fields) is frequently used by hikers to gain access to the area's network of trails, which traverse college property. Any individual may obtain a gym access pass, allowing them use of the college's gym and workout facilities. The library is likewise open to the public. Students should make note of this and should always be aware of their surroundings, even on campus. When walking along the South Campus Road, or on the area's network of trails, it is always best to travel in pairs.

Students are urged to keep watch on each other's vehicles and personal possessions, and to help control access to their residence halls by securing doors and taking notice of uninvited guests in the residential areas.

All students are issued an identification card (or ScotsCard) at the beginning of each academic year. Employees are given ScotsCards when they begin employment at the college. All are expected to carry their ScotsCards with them while on campus, and to present it to campus or law enforcement personnel upon request.

Non-residential buildings are locked nightly at midnight. (An exception is Brock Hall, which is locked daily at 1 a.m.) These buildings are reopened each morning at 6:00 a.m. Non-residential buildings remain locked throughout the day on Sunday (with the exception of certain academic buildings). Access to these areas after-hours is limited to persons who have offices in those buildings or to persons who have obtained after hours permission from college officials.

The main entrance doors to each residential building are capable of being opened after hours only by a resident student using his or her ScotsCard. Safety guidelines are published in the Residence Hall Manual, which is distributed to all residential students at the beginning of each academic year.

College maintenance workers wear uniforms while working, making them identifiable to students and employees. All college personnel are expected to announce themselves prior to entering the residence areas of the other gender. Contractors are ordinarily accompanied by college personnel when they enter residence facilities.

Safety and Security guards make nightly inspections of the campus lighting, and make note of needed repairs. Bushes, trees and shrubs on campus are pruned regularly, and the grounds department regularly inspects the campus for possible visibility issues that may create security concerns.

Exterior doors of campus buildings are locked each evening automatically and/or by security officers. Faulty locks or other security deficiencies are reported daily to the Facilities Management staff for repair or replacement.

Resident Directors and Resident Assistants are on duty in residence halls to monitor access to buildings and to provide assistance to the students during evening hours.

The college also uses video surveillance cameras to monitor vital aspects of the campus. This includes the entrances to the residence halls and other campus buildings.

Exterior lighting is an important part of the college's safety and security. Parking lots, walkways, and building exteriors are well lighted. Surveys of exterior lighting on campus are conducted by the college's guard on a routine basis and reported to Facilities Services for repair or replacement.

F. Procedure if a Student is Reported Missing

As required by the Higher Education Opportunity Act and in an effort to ensure the safety of our students, Covenant College has established the following missing student protocol. This policy applies to students who reside in campus housing, including off-campus apartment units owned by the college for student residents. The policy may also be applied to students who reside off campus when appropriate.

For purposes of this policy, a student may be considered "missing" if the student's absence is contrary to his/her usual pattern of behavior and unusual circumstances may have caused the absence. Such circumstances could include, but are not limited to, a report or suspicion of foul play, a reported expression of depression or suicidal thoughts, a suspected drug dependency, suspected involvement in a life-threatening situation or with persons who

may have endangered the student's welfare. Likewise, the absence may be entirely unexplained, yet inconsistent with established norms.

All Covenant College students who reside in on campus housing will be given an opportunity annually to select an individual or individuals to contact in the event they become missing. This individual may or may not be the same person designated as the student's general emergency contact. The individuals designated as emergency contacts will remain so until changed or revoked by the student. This information will be registered confidentially, and will only be accessible by authorized campus officials.

In the event a student is determined to be missing from campus for 24 hours (or sooner), Covenant College will notify the designated contact person within 24 hours of this determination. (A determination that a student is missing may be made at any time based upon circumstances. It is not necessary to wait a full 24 hours to make this determination.)

If a student is under the age of 18, and is not an emancipated minor, the college must notify a custodial parent or guardian within 24 hours of the determination that the student is missing, IN ADDITION to the person designated by the student.

Further, the college must also notify local law enforcement within 24 hours of the determination that a student is missing, regardless of the student's age. This must occur even if the student elected NOT to provide a contact person in the event they became missing, and regardless of the status of the student.

Any member of the Covenant College community who has information that a residential student may have been missing for a 24 hour period must immediately make notification. (It is not necessary to wait for the full 24 hour period to elapse before making notification. Notification of a missing person may be made at any point it is determined necessary.) Notification of a missing person must be made to one of the following college officials:

- Director of Safety and Security @ (423) 593-1403
- Dean of Students @ (706) 419-1107
- Associate Dean of Students for Residence Life @ (706) 419-1108
- Resident Director on Duty @ (706) 419-1176

In any event, information concerning missing students must also immediately be forwarded to the Safety and Security Department, phone (706) 419-1229, or (423) 593-1403.

Although not required by statute, all are encouraged to follow the same procedures when non-residential students are suspected of being missing. In order to avoid jurisdictional conflicts when an off-campus and/or commuter student is believed to be missing, the reporting person should also immediately notify local law enforcement authorities. The Safety and Security Department will assist external authorities with these investigations to the greatest extent allowable.

G. Drug and Alcohol Violations

Covenant College recognizes the state's interest in enforcement of alcohol and drug laws, and may remand any student found in violation of these laws on campus over to the appropriate legal authorities in addition to whatever penalties they may receive from the college.

In accordance with the Covenant College Student Handbook, Covenant College enforces all applicable laws regarding the possession, use, or sale of alcohol by underage persons or of illegal drugs. In addition, Covenant College prohibits the on-campus possession and/or use of tobacco products and alcoholic beverages by all students, regardless of age. All students who live in college housing and all single students living off-campus are additionally required by the college to refrain from possession and/or use of tobacco products and/or alcoholic beverages, on or off campus, regardless of age, unless they are at their parent's home or expressly under their parent's authority.

The Covenant College Employee's Handbook proclaims Covenant as a Drug Free Workplace. Annual health programming, available to all students, faculty, and staff of the college, includes a display depicting the health risks associated with the use of illicit drugs and the abuse of alcohol.

The Director of Health Services is also available for counseling and referral for any student or employee who seeks assistance in these areas.

H. Covenant College Title IX Policy

Introduction

The mission of Covenant College is to explore and express the preeminence of Jesus Christ in all things. We strive to educate Christians to engage culture and cultures, to examine and unfold creation, and to pursue biblical justice and mercy in community. We hold strongly to the beliefs that humans are created in the image of God, and therefore should be treated with the utmost honor, dignity, and respect.

Therefore, it is the position of the College that sexual misconduct transgresses holy law and, in addition, is a form of illegal discrimination that is abhorrent to the College. Consequently, it is the obligation of each member of the Covenant College community—administrators, faculty, staff, and students – to adhere to this policy.

The College has enacted this Title IX and Sexual Misconduct Policy (the "Policy") to reflect and maintain its institutional values and community expectations, to provide for fair and equitable procedures for determining when this Policy has been violated, and to provide recourse for individuals and the campus community in response to violations of this Policy.

Statement of Policy

It is the policy of Covenant College to maintain an environment that is free of all forms of discrimination and harassment for community members, including students, faculty, administrators, staff, or Third Parties working with the College or on its property.

Covenant College will not tolerate any form of discrimination and harassment on the basis of sex that interferes with an individual's safety, academic or work performance, or creates an intimidating, hostile, or offensive living, work, or classroom environment. Consistent with Title IX of the Educational Amendments of 1972 and the Violence Against Women Act, and other applicable state and federal laws, this Policy prohibits all forms of sexual or gender-based discrimination, harassment, and misconduct, including sexual harassment, sexual assault, dating violence, domestic violence, and stalking. This Policy also prohibits retaliation against a person who reports, or who otherwise participates in good faith in any matter related to this Policy. All of the foregoing conduct shall be referred to as "Prohibited Conduct."

Prohibited Conduct which occurs within the educational program or activity will be investigated through the Title IX grievance investigation process. Sexual misconduct or other sexually inappropriate behavior that occurs outside of the scope of the Title IX Policy will be handled through the disciplinary process for students through Student Development and for employees through Human Resources.

Scope of Policy

Covenant College will pursue disciplinary action for any community member, including students, employees, or Third Parties having any official capacity with the College or on its property who is found to be in violation of the Title IX and Sexual Misconduct Policy; regardless of whether the conduct occurred on or off campus.

The Title IX grievance investigation process specifically covers incidents that happen on campus or that are specifically part of the educational program or related activity, including internship programs, athletic travel, and conduct which occurs on any property owned, controlled, leased, or managed by the College.

When used in this Policy, **“Complainant”** refers to an individual who is alleged to be the victim of conduct that could constitute sexual harassment, or the individual who is identified as the subject of Prohibited Conduct. **“Respondent”** refers to an individual who has been reported to be the perpetrator of conduct that could constitute sexual harassment, or the individual alleged to have engaged in Prohibited Conduct. A **“Third-Party”** refers to any other participant in the process, including a witness or an individual who makes a report on behalf of a Complainant.

Prohibited Conduct and Definitions Pertaining to the Policy

Discrimination

Discrimination is unequal, adverse treatment of an individual because of his or her protected legal status, such as race, color, age, gender, national origin, or disability. Such discriminatory behavior violates the law and is contrary to Covenant College’s Statement of Purpose, and it will not be tolerated.

Specifically Prohibited Types of Sexual Misconduct:

Sexual Misconduct is conduct of a sexual nature or conduct based on sex or gender that is nonconsensual or has the effect of threatening, intimidating, or coercing a person. The College prohibits the following specific conduct (defined below):

- | | |
|-----------------------|-----------------------|
| 1. Sexual Harassment; | 4. Domestic Violence; |
| 2. Sexual Assault; | 5. Stalking; |
| 3. Dating Violence; | 6. Retaliation |

Other conduct that is not specifically listed but has the essential elements of being based on sex or gender; is nonconsensual, or has the effect of threatening, intimidating, or coercing a person will be treated as Prohibited Conduct.

Sexual Harassment

“Sexual harassment” is an umbrella term which encompasses any unwelcome sexual advances, requests for sexual favors or acts, or other unwelcome conduct of a sexual nature, whether verbal, physical, graphic, or otherwise.

Sexual Harassment is conduct on the basis of sex that satisfies one or more of the following:

1. *Quid Pro Quo Harassment*. An employee of the College conditioning the provision of an aid, benefit, or service of the College on an individual’s participation in unwelcome sexual conduct.
2. *Hostile Environment*. Unwelcome conduct determined by a reasonable person to be so severe, pervasive, and objectively offensive that it effectively denies a person equal access to the College’s education program or activity.
3. Incidents of Sexual Assault; Sexual Exploitation; Dating Violence; Domestic Violence; or Stalking (all further defined in the following points).

Covenant College strictly prohibits its faculty members, supervisors, and other employees from implying or suggesting that a student's submission to, or refusal to submit to, sexual advances or participation in sexual conduct is a condition of a grade, admission to a program, favorable recommendation, promotion, continued employment, or other educational decision.

Sexual harassment further includes unwanted touching or intimacy, insulting or degrading sexual remarks or conduct, epithets, sexual jokes, sexually oriented emails or messages, slurs or negative stereotyping based on gender, and the posting or display of sexually offensive or degrading materials on campus or any property owned by the College, or at any College-related function.

Sexual Assault

“Sexual Assault” means an offense classified as a forcible or nonforcible sex offense under the uniform crime reporting system of the Federal Bureau of Investigation, as defined in 20 U.S.C. 1092(f)(6)(A)(v).

Sex Offenses

Any sexual act directed against another person, without the consent of the victim, including instances where the victim is incapable of giving consent.

- A. *Fondling* - The touching of the private body parts of another person for the purpose of sexual gratification, without the consent of the victim, including instances where the victim is incapable of giving consent because of his/her age or because of his/her temporary or permanent mental incapacity.
- B. *Incest* - Sexual intercourse between persons who are related to each other within the degrees wherein marriage is prohibited by law.
- C. *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, including instances where the victim is incapable of giving consent because of his/her age or because of his/her temporary or permanent mental or physical incapacity.

- D. *Sexual Assault with an Object* - To use an object or instrument to unlawfully penetrate, however slightly, the genital or anal opening of the body of another person, without the consent of the victim, including instances where the victim is incapable of giving consent because of his/her age or because of his/her temporary or permanent mental or physical incapacity.
- E. *Statutory Rape* - Sexual intercourse with a person who is under the statutory age of consent.

Factors necessary for affirmative consent and incapacitation are detailed below under Additional Definitions.

Dating Violence

“Dating Violence” includes violence by a person who has been in a social relationship of a romantic or intimate nature with the victim. Whether there was such a relationship will be gauged by its length, type, and frequency of interaction. [34 USC 12291(a)(10).]

Domestic Violence

“Domestic Violence” is a felony or misdemeanor crime of violence committed by: (1) a current or former spouse or intimate partner of the victim; (2) a person with whom the victim shares a child in common; (3) a person who is cohabiting with, or has cohabitated with, the victim as a spouse or intimate partner; (4) a person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction in which the crime of violence occurred; or (5) any other person against an adult or youth victim who is protected from that person’s acts under the domestic or family violence laws of the jurisdiction in which the crime of violence has occurred. [34 USC 12291(a)(8)]

Stalking

“Stalking” occurs when a person engages in a course of conduct directed at a specific person that would cause a reasonable person to fear for his/her safety or the safety of others or suffer substantial emotional distress. [34 USC 12291(a)(30)]

Cyber-stalking is a particular form of stalking in which electronic media such as the internet, social networks, blogs, cell phones, texts, or other similar devices or forms of contact are used.

Retaliation

Retaliation includes adverse action taken against a person for making a good faith report of Prohibited Conduct or participating in any proceeding under this Policy. Adverse action includes conduct that threatens, intimidates, harasses, coerces or in any other way seeks to discourage a reasonable person from seeking protection under this Policy. Retaliation can be committed by or against any individual or group of individuals, not just a Respondent or Complainant. An individual reporting Prohibited Conduct is entitled to protection from any form of retaliation following a report that is made in good faith, even if the report is later not proven.

Covenant College prohibits reprisals or retaliation against any person for:

1. alleging or complaining about discrimination or harassment,
2. for filing an internal complaint of discrimination or harassment, or
3. for filing an agency action or lawsuit alleging discrimination or harassment, or

4. for participating in a harassment investigation.

Any person who retaliates against a complainant will be subject to disciplinary action up to and including termination of employment (employee), and expulsion (student).

Complaints of retaliation should be reported in the same manner as complaints of discrimination or harassment.

Amnesty: Addressing Concerns for Reporting Due to Standards of Conduct Violations

In order to encourage Complainants and Witnesses to make reports of Sexual Misconduct under this Policy, the College will not pursue punitive action against an individual who may be hesitant to report sexual misconduct out of fear that they themselves or others may be accused of violating other College Standards of Conduct policies, such as drinking or use of substances at the time of the incident. Educational options and accountability may be explored, but no conduct proceedings or conduct record will result.

Pertaining to False Allegations

Knowingly making false allegations of discrimination or harassment, or providing evidence during an investigation with knowledge that the evidence is false, is also a violation of College policy and will subject a person to disciplinary action up to and including termination of employment or expulsion.

Additional Definitions:

Consent

“Consent” is a voluntary, sober, fully-informed, clear, and active decision by individuals engaging in sexual activities. Consent can be given by words or actions, as long as those words or actions create a mutually understandable clear permission regarding active willingness to engage in (and the conditions of) sexual activity. You must have consent for each and every sexual act. Consent can be withdrawn at any time.

A sexual interaction is not consensual if it involves:

- Force, coercion (manipulation), threats, or intimidation
- Minors under the age of consent
- Individuals whose mental disabilities prohibit sound judgment
- Individuals physically or mentally incapacitated, either voluntarily or involuntarily, as a result of alcohol or other drug consumption
- Individuals who are unconscious, asleep, unaware, or otherwise physically incapacitated

Refusal to consent does not have to be verbal; it can be expressed with gestures, body language or attitude. Lack of consent may also be communicated through the use of non-verbal expressions or actions indicating resistance. Silence does not imply consent.

A prior sexual history between individuals does not constitute future consent nor consent to that same sexual activity with another person. Previous relationships or prior consent cannot imply consent to future sexual acts with any person. Consenting to one behavior only means that consent is given for that behavior at that point in time.

Force

“Force” is the use or threat of physical violence to overcome an individual’s freedom of will to choose whether or not to participate in sexual activity or provide consent. Consent can never be obtained through the use of force.

For the use of force to be demonstrated, there is no requirement that an individual resisted the sexual advance or request. However, any evidence of resistance by an individual will be viewed as a clear demonstration of a lack of consent.

Coercion

“Coercion” is the use of pressure to compel another individual to initiate or continue sexual activity against that individual’s will. Consent cannot be obtained through coercion. Coercion can include a wide range of behaviors, including intimidation, manipulation, threats, and blackmail.

When someone indicates, verbally or physically, that they do not want to engage in a particular sexual activity, that they want to stop a particular activity, or that they do not want to go past a certain point of sexual interaction, continued activity or pressure to continue beyond that point can be coercive.

Incapacitation

“Incapacitation” is a state where an individual cannot make an informed and rational decision to engage in sexual activity because of a lack of conscious understanding of the fact, nature, or extent of the act and/or is physically helpless.

This includes, but is not limited to:

- If the individual is asleep, unconscious, or otherwise unaware that sexual activity is occurring
- If the individual cannot understand the nature of the activity or communicate due to a mental or physical condition.
- If the individual was incapacitated due to the influence of drugs, alcohol, or medication, so that the individual could not understand the fact, nature, or extent of the sexual activity;

In particular, consent could not occur when the Respondent failed to acknowledge the Complainant’s incapacitation or; failed to take reasonable steps to determine the Complainant’s incapacitation or; the Respondent’s own incapacitation (from alcohol or drugs) caused the Respondent to misjudge the Complainant’s incapacity.

Being intoxicated by drugs or alcohol is not a defense to any violation of this Policy and does not diminish one’s responsibility to obtain consent. Refer to page 5 regarding Amnesty involving incidents involving Standards of Conduct violations.

On and Off Campus Reporting Options

Reporting

The College encourages the reporting of all perceived incidents of sexual misconduct, discrimination, or harassment regardless of the Respondent’s identity or position.

The College aims to support each individual in making decisions to report, and will respect an individual’s autonomy in deciding how to proceed to the extent possible. In this process, the College will balance the individual’s interest with its obligation to provide a safe and nondiscriminatory environment for all members of the College community.

Emergency and Off Campus Reporting Options

The College strongly encourages all individuals to seek assistance from law enforcement immediately after an incident of Sexual Misconduct. This is the best option to ensure preservation of evidence and to begin a timely investigative and remedial response.

Safety and Security have guards on duty twenty-four (24) hours a day. You may report crimes or other emergencies by calling:

Emergency Assistance	911
Dade County Police	(706) 657-3233
Hamilton County Police	(423) 209-7000
Campus Safety and Security	(423) 593-1403 (24/7 support)
Resident Director on Duty	(706) 450-7001 (24/7 support)
Keith McClearn, Director of Safety & Security	(423) 593-1403

On Campus Reporting Options

In order for the process to begin, the College must have actual knowledge. Actual knowledge means notice of sexual harassment or allegations of sexual harassment to the College’s Title IX Coordinator or any College official who has authority to institute corrective measures on behalf of the recipient. Making a report means telling the Title IX Coordinator, a Title IX Deputy Coordinator or Investigator, or a Responsible Employee what happened—in person, by telephone, in writing, or by email. At the time a report is made, a Complainant does not have to request any particular course of action, nor does a Complainant need to know how to label what happened.

Covenant College has designated and specifically trained the following individuals to serve in an official capacity to investigate Title IX and Sexual Misconduct Issues on campus and between Covenant community members:

Designated Title IX Coordinator and Team

Name	Title IX Position	Phone	Email
Brad Voyles	Title IX Coordinator	706-419-1107	brad.voyles@covenant.edu
Becca Moore	Title IX Deputy Coordinator for Students	706-419-1262	becca.moore@covenant.edu
Rebekah McNair	Title IX Deputy Coordinator for Employees	706-419-1105	rebekah.mcnair@covenant.edu

Jon Wylie	Title IX Deputy Investigator	706-419-1108	jon.wylie@covenant.edu
Nesha Evans	Title IX Deputy Investigator	706-419-1106	nesha.evans@covenant.edu

Responsible Authority

As stated in an earlier section, all employees of Covenant College are considered to be a “Responsible Authority”.

A Responsible Authority is defined as any College employee (a) who has the authority to take action to redress sexual violence, (b) who has been given the duty of reporting incidents of sexual violence or any other misconduct by students or employees to the Title IX Coordinator or other appropriate school designee, or (c) whom a student, faculty member, or staff member could reasonably believe has this authority or duty.

Responsible Authorities include students who serve as Resident Assistants. Student workers who are employed through the College’s work-study program are not considered Responsible Authorities, but are highly encouraged to report any knowledge of sexual misconduct to a member of the Title IX team.

The Title IX Coordinator must be informed of all reports and complaints related to this policy. Once the Title IX Coordinator receives actual knowledge of a complaint, the College is obligated to address Title IX issues about which a Responsible Employee had actual knowledge of an incident.

College counseling and health services employees as well as the Chaplain’s office are exempt from these reporting requirements.

Confidentiality Requests and Privacy Concerns

The College is committed to protecting the privacy of all individuals involved in the investigation and resolution of reports under this Policy. While not legally bound by confidentiality, those involved in the Title IX proceedings will be discreet and respect the privacy of all individuals involved in the process to the extent permitted by law.

If an individual desires to report Prohibited Conduct to the College but requests to maintain confidentiality or to not pursue a formal Title IX Complaint investigation, the Title IX Coordinator will weigh the request against the College’s obligation to provide a safe, non-discriminatory environment for all Covenant College community members, including the reporting individual. In making this determination, the Coordinator may consider the seriousness of the conduct, whether there have been other complaints or reports of harassment or misconduct against the Respondent, and the rights of the Respondent to receive notice and relevant information before disciplinary action is sought.

The College will take all reasonable steps to investigate and respond to the complaint consistent with the request for confidentiality or request not to pursue an investigation, but its ability to do so may be limited based on the nature of the request by the Complainant. If the College determines that it cannot maintain a Complainant’s confidentiality, the College will inform the Complainant individual prior to starting an investigation and will, to the extent possible, only share information with people responsible for handling the College’s response.

An individual who seeks confidential assistance may do so by speaking with professionals who have a legally protected confidentiality.

Confidential Resources for Support

Students are highly encouraged to seek professional care for both physical and mental health, regardless of seeking to make a Title IX or Sexual Misconduct Complaint.

Confidential Resources on Campus

On Campus Counseling

Priesthill Counseling Center

706-419-1275

healthservices@covenant.edu

M–F: 8:30 a.m.– 4:30 p.m

Jackson Hall, 1st floor

Chaplain’s Office:

Rev. Grant Lowe, College Chaplain

grant.lowe@covenant.edu

Phone: 706.419.1360

Stephanie Formenti, Chapel Office

stephanie.formenti@covenant.edu

Phone: 706.419.1359

*These confidential resources are not required by current Title IX law to report claims of sexual misconduct without consent. A confidential report is required by state law to notify child protective services and/or local law enforcement of suspected abuse of a minor under the age of 18.

Confidential Resources Off Campus

The Priesthill Center, the Student Development Office, and the Chaplain’s Office have referral lists for counselors in the local Chattanooga area.

Partnership for Families, Children and Adults

423-755-2700 (24/7 support)

Sexual Assault and Relationship Violence Hotline & Clinic

*This is the recommended local facility for survivors of sexual assault. The Partnership has nurses who are well trained in conducting the forensic exam (rape kit) for evidence collection. All services are free.

Family Crisis Center of Walker, Dade, Catoosa, & Chattooga Counties, Inc.

Phone: 706-375-7630 (24/7)

National Sexual Assault Hotline:

Phone: 1-800-656-HOPE (4673)

Supportive Measures and Remedies

Upon receipt of a Formal Complaint, the College will provide reasonable and appropriate Supportive Measures designed to eliminate any existing hostile environment and protect the Parties involved. The College will make

reasonable efforts to communicate with the Parties to ensure that all safety, emotional, and physical well-being concerns are being addressed.

Supportive Measures may be imposed regardless of whether formal disciplinary action is sought by the Complainant or the College, and regardless of whether a crime is reported to Campus Security or local law enforcement.

A Complainant or Respondent may request a “No-Contact Order” or other protection, or the College may choose to impose supportive measures at its discretion to ensure the safety of all Parties, the broader College community, and/or the integrity of the process.

The College will maintain the privacy of any Supportive Measures provided under this Policy to the extent practicable and will promptly address any violation of the Supportive Measures. The College will take immediate and responsive action to enforce a previously implemented Supportive Measure restriction if such restriction was violated.

Range of Supportive Measures

Supportive Measures will be implemented at the discretion of the College. Supportive measures may include, but are not limited to, the following list below, regardless of whether the Respondent is a student or an employee. Supportive measures may continue after a case is resolved if it is in the best interest of the Complainant, Respondent, or the campus community.

- Imposition of campus “No-Contact Order”;
- Rescheduling of exams and assignments;
- Providing alternative course completion options or change in class schedule;
- Change in work schedule or job assignment;
- Change in on-campus housing;
- Limit an individual or organization’s access to certain College facilities or activities pending resolution of the matter;
- Increased security and monitoring
- Leave of Absence for employees

Emergency Removal

The College reserves the right to remove any member of the College community suspected or accused of violating this policy provided that the College’s Threat Assessment and Management Team undertakes an individualized safety and risk analysis, determines that an immediate threat to the physical health or safety of any student or other individual arising from the allegations of sexual harassment justifies removal, and provides the Respondent with notice and an opportunity to appeal the decision immediately following the removal.

- Nothing in this subpart precludes the College from placing a non-student employee respondent on administrative leave during the pendency of a grievance process that complies with § 106.45. This

provision may not be construed to modify any rights under Section 504 of the Rehabilitation Act of 1973 or the Americans with Disabilities Act.

Prevention, Awareness Programs and Training

Prior to registration, all students will be required to complete a Title IX educational training program and pass a quiz on the material before being allowed to finalize registration. During mandatory hall meetings in the first week of classes, Residence Directors and Resident Assistants will provide information to all students regarding sexual assault and misconduct awareness, as well as reporting options and supportive resources on campus. In addition to those specific discussions, the Office of Student Development will have literature available for members of the campus community dealing with sexual assault and misconduct. All employees will receive training on the Title IX policy at the beginning of each academic year. This training will include a general description of the policy and their duties as employees. Human Resources will also share Title IX information with all new employees as part of their orientation and onboarding to the institution.

For further information regarding sexual assault and misconduct or other safety awareness programming, please contact the Office of Student Development.

Resolution of Title IX Complaints

The following procedures will govern all investigations of complaints alleging violations of the Title IX Policy.

The process begins when a Formal Complaint is made to the Title IX Coordinator or Deputy Coordinator. A Formal Complaint should include the following information:

- The names, addresses and phone numbers of the individuals involved
- Specific acts alleged, including dates, times and locations
- Names and contact information of potential witnesses

The investigation will begin promptly following the receipt of the Formal Complaint. If an employee of the college is involved in the alleged discrimination, the complaint will be investigated by the Assistant Title IX Coordinator for Employees. If the Assistant Title IX Coordinator for Employees is involved in the alleged discrimination, the complaint will be investigated by another investigator at the Title IX Coordinator's designation.

Disciplinary action at the College will normally proceed even if criminal proceedings have been initiated. College action will not be subject to challenge on the grounds that criminal charges involving the same incident have been dismissed or reduced, or that no criminal charges have been brought. If civil authorities are notified, students and employees can anticipate that the College may consult with and be in communication with such authorities.

The Respondent is presumed not responsible for the alleged conduct until a determination regarding responsibility is made at the conclusion of the grievance process.

In all procedures involving allegations of violations of this policy, the standard of proof shall be "preponderance of the evidence" which means more likely than not; more probable than not.

With or without a Formal Complaint, the Title IX Coordinator or designee must promptly contact the Complainant to discuss the availability of Supportive Measures, consider the Complainant's wishes with respect to supportive measures, and explain to the Complainant the process for filing a Formal Complaint.

Additionally, the College does not restrict the ability of either the Complainant or Respondent to discuss the allegations under investigation or to gather and present relevant evidence.

Protection of the campus community is paramount, however; and the College may find it necessary to take appropriate disciplinary action with or without concurrence of the Complainant where there is a potential threat to the College community.

Rights of Respondent and Complainant

Complainants and Respondents shall both be provided with the following in connection with the resolution process of suspected or alleged violations of this policy:

Rights of Both Parties include:

- Right to be informed of the process and all available options for resolution (Informal and Formal)
- Right to review all reports involved in the investigation
- Right to Supportive Measures and access to campus resources
- Right to an Advisor of choice
- Right to a prompt, fair, and impartial investigation of all complaints, including the opportunity for the parties to present witnesses and other evidence;
- Right to speak on their own behalf
- Right to review any information that will be offered by the other party in support of the other party's position (to the greatest extent possible and consistent with FERPA)
- Right to a live hearing
- Right to object to a Title IX Coordinator, Title IX Investigator, Decision Maker(s), or any person in the informal resolution process based on conflict of interest and bias.
- Right to be informed of the outcome of the investigation and any proceeding simultaneously/contemporaneously and in writing (to the greatest extent possible and consistent with FERPA or other applicable law);
- Right to appeal final decision

Role of the Advisor of Choice

During any on-campus Title IX Investigation, both Parties are entitled to the same opportunities to have an Advisor of their choice present during this process. The purpose of the Advisor is to provide support. The Advisor may be a student, staff or faculty member, or external individual of choice. The Advisor may, but is not required to be, an attorney.

The Advisor may attend any meeting or hearing with the respective Complainant or Respondent regarding the case, if invited by the respective Complainant or Respondent. For all cases, the Advisor may not speak on behalf of the individual during, or participate directly in, meetings or other proceedings prior to the Live Hearing.

At a Live Hearing, the Advisor is exclusively permitted to cross-examine the Parties and witnesses when directed to do so. If either Party does not have an Advisor for the Live Hearing, the College will provide a designated representative to serve as an Advisor. Either party may choose not to have an Advisor present. However, any Party who declines an Advisor will not be allowed to cross-examine the other party or related witnesses at the Live Hearing.

It is the responsibility of the Complainant and Respondent to communicate with the Advisor regarding allegations, times and dates of meetings, hearings, outcomes and any other information regarding the case. The Hearing Officer, Appeal Officer, Title IX Coordinator, Deputy Coordinators, and Investigators will not discuss the case with any Advisor.

Reasons for Dismissal of Complaint

The College may dismiss the Formal Complaint or any allegations therein, if at any time during the investigation or hearing: a Complainant notifies the Title IX Coordinator in writing that the Complainant would like to withdraw the formal complaint or any allegations therein; the Respondent is no longer enrolled or employed by the College; or specific circumstances prevent the College from gathering evidence sufficient to reach a determination as to the Formal Complaint or allegations therein.

- Dismissal of a Title IX Complaint does not preclude action under another provision of the College's Standards of Conduct

Official Process and Procedures for Investigation and Resolution of Complaints

Prior to any intake meeting, appropriate Supportive Measures will be communicated and both Parties will be made aware of the ability to have an Advisor of their choosing present.

Concurrently, the Coordinator will select Title IX Investigators to conduct a reasonable, impartial, and prompt investigation of the complaint ("Investigation"). The Coordinator will select Investigators based on several factors, including the Parties involved, the complexity of the complaint, the need to avoid any potential conflict of interest, and who may best conduct a fair and equitable investigation for all Parties involved.

Intake Meeting for Complainants

Upon receipt of a Formal Complaint, the Title IX Office (Coordinator or designated Investigators) will conduct an Intake Meeting with the Complainant.

At that meeting, the Coordinator or Investigators will provide:

- Notification of the right to be assisted by individuals at the College in contacting law enforcement or seeking medical care
- A written copy of the Title IX and Sexual Misconduct policy and procedures
- A list of Supportive Measures detailed above
- A review of the Rights of Complainants and Respondents detailed above

- Notification of on and off campus resources, including counseling, the chaplain's office, local resources, and legal assistance options
- An overview of the procedural options and process, including Informal Resolution and Formal Resolution
- An explanation the right to object to the assignment of the Title IX Coordinator, Deputy Title IX Coordinator or Investigators based on bias or conflict of interest within 1 business day of a decision to proceed through the process

As described in Section IV, the Complainant has the right to request that the Title IX office not share the Complainant's name (or other identifiable information) with the Respondent, or that the Title IX office take no formal action in response to the report. If the Complainant makes such a request, the Coordinator will balance the request with his/her dual obligation to provide a safe and nondiscriminatory environment for all College community members, and to remain true to principles of fundamental fairness that require the College to provide the Respondent with notice of the allegations and an opportunity to respond before action is taken against the Respondent.

Respondent Intake Meeting

Upon receipt of a Formal Complaint, the Title IX Office (Coordinator or designated Investigators) will conduct an Intake Meeting with the Respondent.

The Investigators will provide written notice to Respondent of the allegations of sexual harassment including sufficient details known at the time and with sufficient time to prepare a response before any initial interview.

The intake with the Respondent will include:

- A written copy of the Title IX and Sexual Misconduct policy and procedures
- A list of Supportive Measures detailed above
- A review of the Rights of Complainants and Respondents detailed above
- Notification of on and off campus resources, including counseling, the chaplain's office, local resources, and legal assistance options
- An overview of the procedural options and process, including Informal Resolution and Formal Resolution
- Explain the College's policy prohibiting retaliation
- An explanation the right to object to the assignment of the Title IX Coordinator, Deputy Title IX Coordinator or Investigators based on bias or conflict of interest within 1 business day of a decision to proceed through the process

The Respondent will be given the opportunity to provide a written statement pertaining to the incident in question to be submitted to the Title IX Coordinator or Investigators.

Informal vs. Formal Resolution Decision

The Coordinator will determine whether the report may proceed through Informal Resolution, or must proceed through Formal Resolution.

If the Coordinator determines that the complaint may appropriately be resolved through Informal Resolution, the Coordinator will ask the Complainant and Respondent, separately, whether they would agree to pursue resolution of the complaint informally. Any resolution reached through an informal process will be confirmed in writing and provided to the parties.

If either party does not agree to pursue Informal Resolution, or if the Complainant, Respondent, or Coordinator, at any time, determines that Informal Resolution is no longer appropriate, the Coordinator will promptly inform the Complainant and Respondent in writing that the complaint will proceed through Formal Resolution.

Informal Resolution

Informal Resolution is a voluntary and remedies-based resolution designed to eliminate the prohibited conduct, prevent its recurrence, and remedy its effects in a manner that meets the needs of the parties while still maintaining the safety of the campus community. Where an initial assessment concludes that Informal Resolution may be appropriate, the College will consider and implement Supportive Measures as outlined above. The Informal Resolution process may not be used to resolve allegations that an employee sexually harassed a student.

Other potential remedies include targeted or broad-based educational programming or training, supported direct conversation or interaction with the respondent, and/or indirect action by the Title IX Office. Depending on the form of Informal Resolution used, it may be possible for a complainant to maintain anonymity. The College will not compel a party to engage in mediation, or to participate in any particular form of Informal Resolution. The decision to pursue Informal Resolution will be made when the College has sufficient information about the nature and scope of the conduct, which may occur at any time.

Participation in Informal Resolution is voluntary, and either party can request to end Informal Resolution at any time. Additionally, the Title IX Coordinator can end Informal Resolution if the Coordinator determines it is no longer the appropriate avenue for resolution for a given report. If Informal Resolution is stopped prior to completion, information that is shared with or documented by the facilitator of the Informal Resolution will not be shared with the Investigator if Formal Resolution is initiated. A party's willingness to participate in Informal Resolution will not be considered as evidence in a formal resolution.

At the conclusion of an Informal Resolution, the Complainant and the Respondent have two business days to change their mind about the resolution of the case. If either the Complainant or Respondent changes their mind regarding the agreed upon resolution, they must do so in writing and submit it to the Title IX Coordinator. Should the request not be received in writing (including electronically), or does not submit within two business days, the Informal Resolution will be considered final and binding.

The Title IX Office will maintain records of all reports and conduct referred for Informal Resolution. If the Respondent is found responsible for any violations of this policy in the future, information regarding the prior report processed through Informal Resolution may be used in the sanctioning phase for the subsequent report, provided that the Respondent is granted the opportunity to address the prior report as well.

While the College will seek to honor confidentiality of the parties' communications with the facilitator during the Informal Resolution process to the extent necessary to facilitate the resolution, the College may be required to produce records created during this process in response to a judicial subpoena or a FERPA educational record request.

Formal Resolution

If the Coordinator determines that the Complainant's report must proceed through Formal Resolution or either Party indicates the desire to proceed through Formal Resolution, the Coordinator will notify both Parties, in writing, of the decision.

The Coordinator will notify the Parties, in writing, of the name of the designated Investigators at the time the Coordinator issues the notice of Formal Resolution. Both Parties will have 2 business days to object to the Investigators selected on the basis of bias or conflict of interest. If either Party objects, the Coordinator will evaluate whether the objection is substantiated. The Coordinator will remove and replace any Investigator the Coordinator finds to have a bias or conflict of interest against either Party. The decision of the Title IX Coordinator is final and not subject to appeal.

The Investigators, in consultation with the Coordinator, will establish and notify the Parties of a preliminary timeline and process for conducting the Investigation and report the timeline to the Parties.

Each stage of Formal Resolution proceeds as follows:

Preliminary Investigation

The purpose of a Preliminary Investigation is to identify and gather all relevant facts; and to provide the Parties with an opportunity to develop, and respond to, the allegations and evidence presented.

Step One: Initial Fact-Gathering Interviews

The Investigators will interview both Parties and relevant witnesses, including fact and expert witnesses, and gather documentary evidence provided by the Parties and any identified witnesses. The Investigators will prepare a summary of each interview ("Interview Summary").

The Investigators will share the Interview Summary with the interviewee. The interviewee will have the opportunity to correct or comment on any statements made in the Interview Summary. If the interviewee has no corrections to, or comments on, the Interview Summary, the interviewee will sign an acknowledgement that the interviewee has reviewed the summary.

If the interviewee has corrections or comments to the Interview Summary, the interviewee may submit a written response directly to the Investigators within 3 business days reflecting any additions or changes which the interviewee believes are necessary to ensure the accuracy of the interviewee's statement.

The Investigators may use evidence including but not limited to police reports, text messages, emails, communication from social media platforms, video or audio recordings, witness statements, campus reports, and all other appropriate reports, recordings, etc.

Step Two: Rebuttal Fact-Gathering

The Investigator may conduct follow-up interviews with both Parties and witnesses based upon testimonial and documentary evidence gathered during Initial Fact-Gathering. The Parties and witnesses can expect that, in these follow-up interviews, the Investigators will seek responses to specific allegations or evidence.

To the extent additional material, witnesses or evidence are identified during Rebuttal Fact-Gathering, the Investigators will conduct additional interviews and gather additional evidence. Rebuttal Fact-Gathering may be repeated as necessary to ensure a complete gathering of evidence and testimony.

The Parties may provide a written response to the Preliminary Report, or any portion of it, including each Interview Summary. The Investigator will consider any written response provided by the Parties in preparing the Final Report.

The Parties may submit a written request for additional investigation including follow-up interviews, new witnesses, or new evidence to consider.

Step Three: Preliminary Report

The Investigators will prepare a Preliminary Report which will entail a summary of the objective evidence gathered in the course of the Preliminary Investigation. The Preliminary Report must be sent to the parties as well as the designated advisors. The Parties will have 10 days to respond.

The Investigators will not state ultimate findings as to whether the Respondent has, or has not, violated one or more of the College's policies; however the Investigators can include a recommendation of findings and conclusions. The Investigators will attach as exhibits to the Preliminary Report all Interview Summaries and any documentary evidence gathered as part of the investigation that is directly related to the allegations in the Formal Complaint, including any evidence upon which the College does not intend to rely in reaching a determination regarding responsibility and any inculpatory or exculpatory evidence whether obtained from a Party or other source.

When the Investigators determine that the Preliminary Investigation is complete, the Investigators will submit the Preliminary Report to the Coordinator. The Coordinator may require the Investigators to conduct additional investigation; if so, the Investigators will conduct additional investigation consistent with the procedures outlined above. If neither of the Parties requests additional investigation, the Investigators will prepare the Final Report. If either (or both) Parties request additional investigation, the Investigators will review the request(s) in consultation with the Coordinator.

Final Report

Once the Coordinator has agreed that the Preliminary Investigation is complete, the Coordinator will provide the Final Report to the Parties for review. Neither the Complainant nor the Respondent (or their advisors) may copy, remove, photograph, print, image, videotape, record, or in any manner otherwise duplicate or remove the information provided.

The Final Report will include the following: the testimonial and documentary evidence from the Preliminary Investigation, the Preliminary Report, the Addendum (if applicable), and all of the Parties' responses throughout the Formal Resolution proceeding.

This standard of proof is that the evidence presented during the investigation is "preponderance of the evidence" of responsibility.

Once the Investigators are satisfied that the Final Report is complete, the Investigator will submit the Final Report including the recommended findings and conclusions regarding responsibility of the Respondent to the Coordinator. The Coordinator will review and state the determination and sanctions on the Final Report. The Coordinator will send the Final Report to both Parties for their review and both Parties will have ten days to respond.

At least 10 days after sending the Final Report, The Coordinator will meet with the Complainant and Respondent individually. At the meeting the Coordinator will communicate the decision of the Coordinator on the findings and the sanctions.

If there is no objection by either party, the case is concluded.

If either party contests the decision on the findings, the Coordinator will schedule a live hearing of the case.

No less than three business days prior to the hearing, the Parties must submit any new evidence that they want considered or provide a signed statement that there is no new evidence. Parties must also notify the College of the name of their designated advisor three days prior to the Live Hearing.

Live Hearing

Once the Coordinator has received a request for a Live Hearing, the Coordinator will set the date and time of the hearing, appoint a Decision Maker(s) consisting of trained decision maker(s) and notify the parties of the hearing date and option to call witnesses to the proceeding. Either party may request the hearing be held virtually. The Live Hearing will be recorded with either audio or video and records will be maintained for 7 years.

The Live Hearing will have a Decision Maker(s) who will ultimately make the determination by majority decision as to whether or not, by the Preponderance of the Evidence standard of proof, the Respondent is responsible for the alleged Title IX Policy violation. The Coordinator will provide the Decision Maker(s) all information related to the situation. The Hearing will also have a Hearing Officer to maintain decorum and facilitate the Hearing proceedings.

Live hearings include the opportunity for the Parties to present their opening and closing statements as well as to present their factual position, and for the Decision Maker(s) to question the Parties and witnesses presented. Both Parties will also have the right to cross-examine the other Party and witnesses, exclusively through the chosen Advisor. If a party does not have an advisor present at the live hearing, the College will provide an option of an advisor of the school's choosing to conduct cross-examination on behalf of that party. Either party may choose not to have an Advisor present. However, any Party who declines an Advisor will not be allowed to cross-examine the other party or related witnesses at the Live Hearing.

Cross-examination will be conducted exclusively through the designated Advisor. Only relevant cross-examination and other questions may be asked of a party or witness. Before a complainant, respondent, or witness answers a cross-examination question, the Decision Maker must first determine whether the question is relevant and/or appropriate and explain any decision to exclude a question.

If a party or witness does not submit to cross-examination at the live hearing, the decision-maker(s) must not rely on any statement of that party or witness in reaching a determination regarding responsibility; provided, however, that the decision-maker(s) cannot draw an inference about the determination regarding responsibility based solely on a party's or witness's absence from the live hearing or refusal to answer cross-examination or other questions

The Decision Maker(s) will determine whether the alleged policy violation occurred and, if applicable, will impose the appropriate sanction(s). Both Parties will receive the written determination.

Appeals

A Complainant or Respondent may appeal the decision made by the Decision Maker by submitting a written appeal statement to the Coordinator within three business days of the date the hearing report is sent to the parties. The three grounds for appeal are:

(A) Procedural irregularity that affected the outcome of the matter

(B) New evidence that was not reasonably available at the time the determination regarding responsibility or dismissal was made, that could affect the outcome of the matter; and

(C) The Title IX Coordinator, investigator(s), or decision-maker(s) had a conflict of interest or bias for or against complainants or respondents generally or the individual complainant or respondent that affected the outcome of the matter.

Appeals for cases arising under this policy will be heard by the Vice President for Academic Affairs, Vice President of Finance, or designee. The Coordinator is responsible for selecting one of these persons to consider appeals.

If the designated appellate person determines that a ground for appeal is substantiated, the case will be returned to the Coordinator. Otherwise, the decision of the Decision Maker(s) stands. When a case is returned to the Coordinator, the Coordinator may decide to drop the case (e.g., based on insufficient information to believe that a policy violation may have occurred), send the case to the original Decision Maker(s) for reconsideration, send the case to a new Decision Maker(s) with the same or different charges, and/or (re)implement any aspect of the disciplinary process.

Sanctions

Sanctions are the outcomes if the Respondent is found responsible. Potential sanctions include, but are not limited to:

1. Expulsion- Permanent severance of the student's relationship with the College. This severance includes being barred from campus.
2. Immediate Suspension- The student may be required to leave the campus immediately if, in the opinion of the Title IX Coordinator, the student's presence on campus would be detrimental to the institution. Suspension without a hearing shall continue until the disciplinary process is completed. Best efforts will be made to schedule and complete the disciplinary process as promptly as possible.
3. Limited Suspension- A student may be denied any participation for a specified period of time. These privileges may include, but are not limited to, class attendance, housing, parking on campus, participation in extracurricular activities, ID card privileges, access to institutional facilities, and access to the campus.
4. Disciplinary Probation- Notice to the student that any further, major disciplinary violation may result in suspension. Disciplinary probation might also include one or more of the following: the setting of restrictions or the issuing of a reprimand.
5. Counseling- a student may be required to participate in mental health counseling with the counselor of the student's choosing. The Counselor may confirm participation, but not the content of the meetings.

6. Mentor Discipleship- a student may be required to meet weekly with a mentor to discuss appropriate sexual conduct and personal responsibility
7. Appropriate Sexual Behavior Education- student may be required to complete an assigned curriculum addressing appropriate and consensual sexual conduct
8. Reprimand (either oral or written)- official warning or reproof sent to a student and retained in the student's file declaring that further similar conduct will result in immediate and increasing levels of disciplinary action. This may include continuation of supportive measures instituted during the grievance process
9. Employee discipline - the resolution of a Title IX complaint involving an employee may prompt official discipline from the College according to the Employee Handbook

I. Campus Crime Statistics Collection/Definitions

All colleges and universities are to provide statistics for the most recent calendar year and during the two preceding calendar years. Occurrences reported to campus security authorities or local agencies which occurred on campus, certain non-campus properties, and certain public property areas for the following criminal offenses* are to be reported:

Murder

Non-negligent Manslaughter

Negligent Manslaughter

Sex Offenses

Robbery

Aggravated Assault

Burglary

Motor Vehicle Theft

Arson

Domestic Violence

Dating Violence

Stalking

When hate crimes occur they are reported by the following category of prejudice:

Race = ra

Gender = g

Religion = re

Sexual Orientation = s

Ethnicity = e

Disability = d

* Each of the above categories is represented in the crime statistics table by the letter to the right of each category. Each crime that is motivated by a type of bias or prejudice will have a letter notation in parentheses for the type of bias. Numbers in parenthesis indicate the number out of the total number of incidents that were motivated by each type of bias.

According to the UCR (the FBI's Uniform Crime Reporting system) these crimes are defined as follows:

Murder - Criminal Homicide 1. Murder & Non-negligent Manslaughter - "the willful (non-negligent) killing of one human being by another." This does not include assaults to murder, attempted murder, or deaths which are indirectly the result of other criminal activity (such as a heart attack caused by a robbery, etc.). 2. Negligent Manslaughter - the killing of another person through gross negligence. Traffic fatalities are excluded.

Rape, Forcible and Non-forcible Sex Offences - The HEA enlarges upon the UCR rape definition of the carnal knowledge of a female forcibly against her will. The enlarged definition includes forcible and non-forcible sex offenses. A forcible sex offense is "any sexual act directed against another person, forcibly and/or against that person's will; or not forcibly or against the person's will where the victim is incapable of giving consent." This includes forcible rape, forcible sodomy, sexual assault with an object, and forcible fondling. Non-forcible sex offenses are acts of "unlawful non-forcible sexual intercourse."* These include incest and statutory rape (Acquaintance rape could be in either category depending on circumstances.).

**Taken from the National Incident Based Reporting System (NIBRS).*

Robbery - "The taking or attempting to take anything of value from the care, custody, or control of a person or persons by force or threat of force or violence and/or by putting the victim in fear." (Force, or the threat of force, must be present even though a weapon is not involved.)

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." Injury does not need to result if a weapon is used (threat of bodily injury with a weapon of some sort is considered aggravated assault).

Burglary - "The unlawful entry into a structure to commit a felony or theft." Theft from a building to which a person has legal access (A public building during open hours or a residence hall by one of the residents of the building) is considered Larceny-theft and is not reportable here.

Motor Vehicle Theft - "The theft or attempted theft of a motor vehicle." This does not include theft or parts or accessories from a vehicle.

Arson - The willful or malicious burning of or attempts to burn structures, vehicles, or other property, with or without intent to defraud.

Domestic Violence - A “felony or misdemeanor crime of violence committed by: a current or former spouse or intimate partner of the victim, a person with whom the victim shares a child in common, a person who is cohabitating with or has cohabitated with the victim as a spouse or intimate partner, a person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction receiving grant monies [under VAWA], or any other person against an adult or youth victim who is protected from that person’s acts under the domestic or family violence laws of the jurisdiction.”

Dating Violence - Violence committed by a person who is or has been in a social relationship of a romantic or intimate nature with the victim, and where the existence of such a relationship shall be determined based on a consideration of the following factors: length of the relationship; type of relationship; and frequency of interaction between the persons involved in the relationship.

Stalking - Engaging in a course of conduct directed at a specific person that would cause a reasonable person to: Fear for his or her safety or the safety of others; or suffer substantial emotional distress.

Reporting of Statistics

All colleges and universities are to provide statistics concerning the number of arrests and campus disciplinary actions for crimes occurring on campus pertaining to liquor law violations, drug abuse violations, and weapons possessions.

According to the NIBRS these violations are defined as follows:

Liquor Law Violations - The violation of laws or ordinances prohibiting the manufacture, sale, purchase, transportation, possession, or use of alcoholic beverages.

Drug Abuse Violations - (Drug/Narcotic Offenses) The violation of laws prohibiting the production, distribution, and/or use of certain controlled substances and the equipment or devices utilized in their production and/or use.

Weapons Possessions - The violation of laws or ordinances prohibiting the manufacture, sale, purchase, transportation, possession, concealment, or use of firearms, cutting instruments, explosives, incendiary devices, or other deadly weapons.

J. Campus Crime Statistics

The following statistics are provided in compliance with the Jeanne Clery Disclosure of Campus Policy and Campus Crime Statistics Act.

	2018	2019	2020
Criminal Offenses and Hate Crimes			
On Campus			
Murder (Non-Negligent Homicide)	0	0	0
Manslaughter (Negligent Homicide)	0	0	0
Rape	0	0	1

Fondling	0	1	0
Incest	0	0	0
Statutory rape	0	0	0
Robbery	0	0	0
Aggravated Assault	0	0	0
Burglary	9	3	2
Motor Vehicle Theft*	0	0	0
Arson	0	0	0
Hate Crimes	0	0	0

Criminal Offenses and Hate Crimes

On Campus Student Housing

Murder (Non-Negligent Homicide)	0	0	0
Manslaughter (Negligent Homicide)	0	0	0
Rape	0	0	1
Fondling	0	0	0
Incest	0	0	0
Statutory rape	0	0	0
Robbery	0	0	0
Aggravated Assault	0	0	0
Burglary	9	2	2
Motor Vehicle Theft*	0	0	0
Arson	0	0	0
Hate Crimes	0	0	0

Criminal Offenses and Hate Crimes

Public Property

Murder (Non-Negligent Homicide)	0	0	0
Manslaughter (Negligent Homicide)	0	0	0
Rape	0	0	0
Fondling	0	0	0
Incest	0	0	0
Statutory rape	0	0	0
Robbery	0	0	0
Aggravated Assault	0	0	0
Burglary	0	0	0
Motor Vehicle Theft*	0	0	0
Arson	0	0	0
Hate Crimes	0	0	0

VAWA Offenses

On Campus

Domestic Violence	0	0	0
Dating Violence	1	0	2
Stalking	0	1	0

VAWA Offenses

On Campus Student Housing

Domestic Violence	0	0	0
Dating Violence	1	0	2
Stalking	0	0	0

VAWA Offenses

Public Property

Domestic Violence	0	0	0
Dating Violence	0	0	0
Stalking	0	0	0
Arrests			
On Campus			
Weapons: carrying, possessing, etc	0	0	0
Drug Abuse Violations	0	0	0
Liquor Law Violations	0	0	0
Arrests			
On Campus Student Housing			
Weapons: carrying, possessing, etc	0	0	0
Drug Abuse Violations	0	0	0
Liquor Law Violations	0	0	0
Arrests			
Public Property			
Weapons: carrying, possessing, etc	0	0	0
Drug Abuse Violations	0	0	0
Liquor Law Violations	0	0	0
Disciplinary Actions			
On Campus			
Weapons: carrying, possessing, etc	2	1	0
Drug Abuse Violations	2	5	0

Liquor Law Violations	0	0	7
Disciplinary Actions			
On Campus Student Housing			
Weapons: carrying, possessing, etc	2	1	0
Drug Abuse Violations	2	4	0
Liquor Law Violations	0	0	7
Disciplinary Actions			
Public Property			
Weapons: carrying, possessing, etc	0	0	0
Drug Abuse Violations	0	0	0
Liquor Law Violations	0	0	0
Unfounded Crimes	0	0	0

* Does not include theft from a motor vehicle

Part Two: The Annual Fire Safety Report

A. Covenant College Fire Policies and Procedures

The Annual Fire Safety Report is consolidated with the Annual Security Report. No fires occurred on campus property in 2019.

The College's Fire Alarm System

The main buildings on campus, specifically Carter Hall, all residence halls, all academic buildings, the Chapel, the Barnes/Ashe Gym, the Library, and Probasco have networked fire alarm systems centrally controlled from a location within Carter Hall. These buildings report alarms to Dade County Emergency Operations dispatch.

A limited number of buildings, including the student apartments, the maintenance shop, the grounds shop, and the Highlands Building have smoke detectors only. These fire alarms must be phoned in by calling 911.

West Brow Fire and Rescue Department

For fire and medical emergencies, the College falls within the jurisdiction of Dade County's West Brow Fire and Rescue Department. In 2019, the West Brow Fire and Rescue Department responded to campus 22 times for fire alarms and four times for miscellaneous (non-medical) emergencies. (In addition, ten responses to our campus were for medical emergencies, and one was for a motor vehicle accident.)

Fire Drills

Each residence hall receives a fire drill annually. A fire on campus could be a matter of life or death, therefore, it is necessary that all staff read and become familiar with the fire policy. Fire drills may be held at unannounced times during the day and at night. The fire alarm is recognized by a constant sounding horn. There are signs in all hallways as to the direction of the exits. In the resident halls, the Resident Assistants (RAs) are responsible for making sure that all residents evacuate the hall.

The fire alarm system may be utilized for all emergency evacuations including other life threatening emergencies such as an explosion, a toxic chemical spill/ release, gas cylinder failure, a bomb threat, or other emergency.

Preventing a Fire Emergency

Many fires are preventable. The dangers of fires among college-aged students who live in on- and off- campus college housing are real. In particular, the National Safety Council reports that cooking accidents are the number one cause of residence fires and fire injuries. Covenant College students should be aware of the risks regarding unattended cooking, the dangers of disabling smoke alarms in rooms, and the preventative actions that can save lives. (At Covenant College, candles and open flames are forbidden in all residence halls per the residence hall manual.)

Preparing for Fire Emergency

All members of the campus community should familiarize themselves with the location of fire alarms, portable fire extinguishers, and emergency egress routes for the buildings in which they find themselves. There are evacuation maps posted on each floor or each section of the floor near elevators, stairs, and fire alarm pull stations. Each person should be aware of both primary and alternate routes of evacuation in the event the main routes are blocked by fire or any other hazard. Each building occupant should become familiar with fire extinguisher locations.

Fire Extinguishers

Portable fire extinguishers are installed in every building. Students should familiarize themselves with the locations of fire extinguishers and their basic operation.

Fire extinguishers are to be used when:

- The fire is small and can be contained safely with a fire extinguisher.
- The exit is clear and there is no imminent peril.
- The proper fire extinguisher is readily available.

Fire extinguishers are used by remembering PASS.

P - pull the pin

A - aim low

S - squeeze

S - sweep

If You Discover a Fire

- Immediately activate the fire alarm at the closest pull station. Alert everyone in the immediate vicinity.
- Leave the building AND call 911 to report the fire. Next call Safety and Security at 423 593-1403.
- ONLY Use a fire extinguisher if appropriate AND you are in no immediate danger; otherwise Immediately leave the building.

Fire in a campus building

- If possible, leave the building immediately.
- Isolate the fire by closing all doors on your way out. Don't lock these doors.
- Crawl low under any smoke to your exit; heavy smoke and poisonous gases collect first along the ceiling.
- Before opening a door, feel the doorknob and door. If either is hot, or if there is smoke coming around the door, leave the door closed and use another route out.
- If you open a door, open it slowly. Be ready to shut it quickly if heavy smoke or fire is present.
- Assist injured and disabled persons.
- Do not use campus elevators- use the stairways.
- Do not stop for personal belongings or records.

- Do not stand in smoke. Drop to your knees or stomach and crawl to the nearest exit covering your nose and mouth with a cloth to avoid inhaling smoke.
- Stay out of the way of emergency personnel.
- Notify either emergency personnel or firefighters on the scene if you suspect someone may be trapped inside.
- Do not return to the building until the “All Clear” signal has been given.
- If you can’t get to someone needing assistance, leave and call 911 and tell the emergency operator where the person is located OR tell a staff member.
- If your clothes catch fire, immediately stop, drop, and roll. Cover your face with your hands. Roll over and over or back and forth until the fire is out. If needed, smother the flames with a blanket or towel. Use cool water to treat the burn immediately for 3 to 5 minutes. Cover with a clean, dry cloth. Get medical help right away.

If Trapped Inside a Building

- If you cannot get out, close the door and cover vents and cracks around doors with cloth or tape to keep smoke out. Call 911. Say where you are and signal for help at the window with a light-colored cloth or a flashlight. Call Safety and Security at 423 593-1403.
- Open a window if one is available and place an article of clothing (shirt, coat, etc.) outside the window as a marker for emergency personnel.
- Stay near the floor where there is least smoke.
- Cover your mouth with clothing to avoid inhaling smoke.
- Do not open a door if smoke is pouring in or around the bottom, or it feels hot.
- Shout to alert emergency personnel of your location.

After the Fire Alarm Sounds

When a fire alarm sounds all building occupants are to immediately leave the building. Staff and students should stay off the roads and remain outside or in the designated building. Do not re-enter the building until a fire official indicates safe re-entry.

If the alarm is at night the residents are to report to their Resident Assistant once they are safely out of the building. No one is to re-enter the building until the “all clear” is given by the Fire Department (or the Office of Safety and Security in the event of false alarm when the Fire Department has been cancelled).

When a fire alarm sounds, all building occupants must exit the building and report to the Chapel auditorium and be seated. If the building is locked someone will unlock it as soon as possible.

If the fire event occurs in the Chapel, occupants must evacuate and report to the Great Hall and be seated.

Responsibilities of the State Fire Marshal

The Fire Marshal of the State of Georgia is responsible for approving the following on campus:

1. New buildings and major renovations
2. Periodic campus inspections
3. Handicap accommodations.

Fire Safety Inspections

The Georgia State Fire Marshal makes periodic inspections of the campus. The College's insurance carrier makes annual fire and safety inspections. The supervisor of housekeeping makes daily inspections of hallways and exits to ensure a safe exit in case of a fire.

Portable Fire Fighting Equipment

Portable fire fighting equipment on campus consists of fire extinguishers placed in every campus building in accordance with the standards of the National Fire Protection Association (NFPA) Life Safety Codes. All college owned vehicles are also equipped with fire extinguishers. In addition to the required fire extinguishers, there is also a standpipe and/or hose system in each of the residence halls.

In accordance with NFPA 10, all fire extinguishers are selected according to the hazards present in the area they protect. Since the possibility for class A, B, and C fires exist in most areas of campus, most of the fire extinguishers are multipurpose dry chemical extinguishers having a minimum rating of 2-A:10-B:C. Because of specific equipment in certain areas of campus, multipurpose extinguishers have been replaced by B:C dry chemical, CO₂, or Halon extinguishers depending on the hazards and equipment present. The maximum travel distance to the nearest fire extinguisher is at or below 75 feet depending on the hazard level. Fire extinguishers are inspected on a quarterly basis, and the records are on file in the Safety and Security office. Annual maintenance, hydrostatic testing, and recharging are all performed by an outside fire extinguisher service company. All extinguishers are hydrostatic tested every 5 or 12 years depending on the type of fire extinguisher (5 years for CO₂ extinguishers and 12 for dry chemical and halon). All Facilities Management Personnel are instructed in the use of fire extinguishers. Operating instructions are included on the fire extinguishers.

Inspection and Testing of Fire Suppression Systems

Inspecting and testing of fire hydrants is handled by the local fire department that is responsible for campus fire protection. Complete inspection and testing of the diesel fire pump is conducted annually by an outside company. In addition, the fire pump is inspected monthly by the preventive maintenance shop and allowed to run for 30 minutes.

There is a dry-pipe sprinkler system providing fire suppression protection for the kitchen area, and a dry-chemical fire suppression system for the grill hoods in both the kitchen and the Blink (snack bar). In accordance with NFPA 13A Inspection, Testing, and Maintenance of Sprinkler Systems, the sprinkler system is inspected, tested, and maintained on a quarterly basis by an outside sprinkler system service company. The controls for the sprinkler system are located in the dining hall storage room by the serving line entry. The grill hood fire suppression systems are tested every six months by an outside company that specializes in this type of system. Controls for these systems are located near the grills in the kitchen and Blink.

B. Fire Statistics

Summary of Fires									
Name of Facility	2018			2019			2020		
	Fires	Injuries	Deaths	Fires	Injuries	Deaths	Fires	Injuries	Deaths
Andreas Hall	0	0	0	0	0	0	0	0	0
Carter Hall	1	0	0	0	0	0	1	0	0
Founders Hall	0	0	0	0	0	0	0	0	0
Maclellan Hall	0	0	0	0	0	0	0	0	0
Student Apartment 1-2	0	0	0	0	0	0	0	0	0
Student Apartment 3-4	0	0	0	0	0	0	0	0	0
Student Apartment 5-6	0	0	0	0	0	0	0	0	0
Student Apartment 7-8	0	0	0	0	0	0	0	0	0
Student Apartment 9-10	0	0	0	0	0	0	0	0	0
Student Apartment 11-12	0	0	0	0	0	0	0	0	0
Student Apartment 12-13	0	0	0	0	0	0	0	0	0
Student Apartment 14-15	0	0	0	0	0	0	0	0	0
Craig House	0	0	0	0	0	0	0	0	0
Dunbeg House	0	0	0	0	0	0	0	0	0
The Loft	0	0	0	0	0	0	0	0	0
Total	1	0	0	0	0	0	1	0	0