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INTRODUCTION

Notification of availability of Annual Security Report
All members of the Saint Paul community will receive notification via institutional email that the annual security report has been published no later than October 1st of each year. The notification indicates the contents of the report, the specific web address where the report is published and notification that any interested parties may request a paper copy of the report and that they have a right to receive a copy of the report upon request. Prospective students and employees will be referred to the published report available on the Saint Paul website.

Annual Security Report Responsibilities
Saint Paul School of Theology’s Dean of Students is the Campus Security Authority, and is responsible for

1. Oversight and coordinating the creation of the ASR
2. Working with Church of the Resurrection security personnel and local law enforcement officials to compile the required crime statistics.
3. Maintenance of documents pertinent to the ASR including
   a. All internal documentation required to compile the report.
   b. A copy of original documentation provided by the Church of the Resurrection Security office (who is responsible for maintaining the original copy the document)
4. Ensuring that all crime statistics are properly reported to the department of education.
SECTION ONE
Reporting Crimes and Emergencies

1.1 Emergency response and evacuation procedures

RESURRECTION CAMPUS

General Rules-Fire

- Stay calm, do not panic.
- Don’t assume anyone else has called the Fire Department. Activate fire alarm at the nearest pull station.
- Call 911. Remain calm and give the dispatcher as much information as you can. Provide the address
  a. Resurrection Building C: 13720 Roe Avenue in Leawood for the East building and
  b. Resurrection Building B 5001 West 137th Street in Leawood if it’s the West Building.
  c. Fox Hill Office 4370 West 109th Street, Overland Park, KS
- Exit by the stairs; never take the elevator during a fire. You may be trapped if the power goes out.
- Instructors, be sure everyone is out of the room. Bring the class roster or attendance notebook with you. Help others who need assistance to evacuate.
- Before opening any door, feel the handle with the back of your hand for heat, then feel the door itself, starting from the bottom and moving to the top. If the door is hot DO NOT try to open it. Smoke and flames may rush into your room. If the door is cool, open it slowly but be prepared to quickly shut it if smoke or heat rush in.
- Close doors as you leave to contain fire and smoke. If you encounter smoke or flames during your escape, use another exit.
- Heat and smoke rise so cleaner air will be near the floor. Get as low as possible to the floor and move toward the exit.
- Once outside, move away from the building and stay out until emergency personnel say it is safe to return.
- Do not get into your car and try to leave the church grounds, you may block emergency vehicles trying to enter or leave the premises.
- Notify your teacher/leader that you have safely exited the building.
- If coworkers are still inside the building notify the fire fighters. DO NOT re-enter the building! Do not attempt to rescue coworkers yourself once you have it outside.

General Rules-Bomb Threat

Emergency Bomb Threat Evacuation: EVACUATE ALL BUILDINGS
**Do NOT use two way radios**
**Turn OFF cell phones and pagers**
**Do NOT TOUCH or move and suspicious objects**

- Stay calm, don’t panic
- Leave quickly and orderly
• Instructors, be sure everyone is out of the room. Bring the class roster or attendance notebook with you. Help others who need assistance to evacuate.

• Once outside, move away from the building and stay out until emergency personnel say it is safe to return.

• Notify your teacher/leader that you have safely exited the building.

• If a suspicious object is observed DO NOT TOUCH IT! Note its location and notify
  o Bob Whisman 913-486-9926 and/or
  o Dick Cooper 913-568-9088 and/or
  o Facilities 913-908-2327 and/or
  o Brent Messick 913-515-9125

Evacuation-Fire and Bomb Threat
- Building B/Narthex/Sanctuary: Proceed out the nearest exit. Those exiting the North side of the building should proceed to parking lot A. Those exiting the South side of the building should proceed to parking lot G. Anyone leaving by the East doors should proceed to lot F.

- Building C/Chapel/Youth Center: Proceed out the nearest exit and go to the farthest east or south side of parking lots D and E.

- After evacuation at the Resurrection campus, notify the following regarding the fire location:
  Bob Whisman 913-486-9926 and/or
  Dick Cooper 913-568-9088 and/or
  Facilities 913-908-2327
  Brent Messick 913-515-9125

- Fox Hill administrative office: process out the nearest exit. Proceed to the road median areas with the US Postal service boxes to the south of the building.

- After evacuation at the Fox Hill campus, notify Laura Snow.

Tornado Shelter
- Building B/Narthex/Sanctuary
  a. When advised to seek shelter, evacuate the Sanctuary as directed by the Ushers. Families should stay together.
  b. The West half of the Sanctuary should exit to the Basement area
  c. The East half of the Sanctuary should exit to the Saving Grace/Choir area on the North and East sides of the Sanctuary.

- Building C/Chapel/Youth Center
  a. When advised to seek shelter, use designated routes to the basement area.
  b. Teachers/leaders should ensure that their students remain together and are accounted for. Log the names of all students who are released to their parent or guardian and the name of the person they are released to.

Stay in the shelter until advised that it is safe to leave. FOX HILL CAMPUS
Fire and Tornado Procedures

In case of fire:
- Call 911. The address 4370 W. 109 Street, Overland Park, KS.
- Smoke detectors will activate.
- Elevators will lock down and not respond to the call button.
- Activate the fire alarm. A pull alarm is located on the left of the outer doors, behind a large potted plant.
- A fire extinguisher is located by the staff break room near the fire stairs, and in the hallway near the elevator.

Evacuation in case of fire or other emergency
- Evacuate quickly through the nearest exit. Do not use the elevators, take the stairs. Assist others as needed.
- The fire stairs are designed to be fire and smoke resistant and are the safest way to exit. DO NOT PROP OPEN THE FIRE STAIR DOOR. This would allow smoke and fire to enter. The fire stair doors are locked on the stairwell side. You cannot return through them, only exit to the parking lot.
- Once outside, all persons are to move to across the street from the Saint Paul entry. Please do not go further than the sidewalk to be respectful of Planned Parenthood’s no trespassing signs.
- Do not leave the premises—someone might think you are still inside the building, and lives could be endangered by searching for you.
- Gather by departments and groups and verify that everyone has evacuated. Report to the highest administrator available.
- If it is necessary to leave, sign out with an administrator, supervisor or assigned staff member.

Staff responsibilities in case of evacuation:
- Business office staff clear the offices and Dean’s conference room in the back of the building as they move to the exits or stairwell.
- Academic staff clear the faculty offices and video conference room then move to either of the exits or the stairwell.
- President’s office, Admissions and Development staff (depending on the direction they need to move) clear the offices, conference room, and hospitality area in the front of the building as they move to either exit or the stairwell.
- Front desk clears the restrooms and directs at the front door as needed.
- Be alert to who is on and off location each day. Tell your co-workers when you leave the premises.

In case of tornados:
- Alert others who may not be aware of the warning.
- Move away from the windows to the interior areas of the space. Locations are listed below. As much as possible, stay together and be aware of locations where others are seeking shelter.
- Gather by departments and groups and account for each person. Report to the highest administrator available.
- Do not leave shelter until given the all-clear.
- After the all clear, if there is no damage, return to the Saint Paul office space and again account for each person. If there is damage, gather at the open grassy area across the street from the
Saint Paul entry or other safe gathering location and account for each person, reporting to the highest administrator available.

- If it is necessary to leave, sign out with an administrator, supervisor or assigned staff member.

Protected locations:
- If it is safe to do so, move to the first or second floors via the outside staircases. Shelter in the center hall and restroom areas, away from potential blowing glass.
- The fire stairs are reinforced and can be used during a tornado. Be aware that the fire stairs are locked from the inside on every level. You cannot re-enter on any floor, only exit the building. Go as far down the stairs as seems safe. The ground level fire stair exit has windows that could potentially blow out and it may be best to stay one flight above them. There is a small sheltering space underneath the stairs at the very bottom that is secure but might receive some blowing glass.
- If it is necessary to remain in the Saint Paul office space, use the back hallway, file room or move to the restrooms. Other rooms in that area may be used if needed.

### Emergencies

<table>
<thead>
<tr>
<th>Overland Park</th>
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<td>All emergencies 911</td>
<td>All emergencies 911</td>
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<tr>
<td>Non-emergency Fire 913-888-6066</td>
<td>Non-emergency Fire 913-681-6788</td>
</tr>
<tr>
<td>Non-emergency Police 913-895-6300</td>
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### Hospitals

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<th>Menorah Medical Center</th>
<th>St. Joseph Medical Center</th>
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<tr>
<td>5721 W. 119th Street</td>
<td>1000 Carondelet Drive</td>
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<tr>
<td>Overland Park, KS 66209-3722</td>
<td>Kansas City, MO 64114</td>
</tr>
<tr>
<td>(913) 498-6000</td>
<td>816-942-4400</td>
</tr>
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1.2 Emergency notification system
Saint Paul uses the e2Campus notification program as a quick and effective way to send, via text, time-critical messages to the user’s cell phone and/or email. Thus, a person can receive immediate notice of class cancellations, campus closures and campus emergencies wherever he or she is. All students, faculty, and staff will receive an email copy of e2Campus messages via their Saint Paul email account without taking any action. The e2Campus mass notifications will only be used for vital time-critical urgent messages issued by an e2campus power user as instructed by a senior administrator.

1.3 Procedures for institutional response to dangerous or emergency situations
Senior level administrators including the Interim Vice President of Academic Affairs and Dean, Dean of Saint Paul at Oklahoma City University, Dean of Students, Vice President of Administration/CFO and Vice President of Advancement will evaluate a situation to determine if it is warrants emergency action. They will agree on a plan of action appropriate to the situation and will determine the content of an emergency alert notification if it is deemed necessary. In most situations all members of the Saint Paul community will receive the emergency notification. A senior administrator will be designated to communicate the information to one or more of the e2campus power users who will distribute the notification. Announcements of closings and/or alternate schedules will be made via the following channels immediately following a decision/declaration. Senior administrators will not release an e2campus notification if doing so would compromise efforts to assist a victim or to contain, respond to or otherwise mitigate the emergency.

1.4 Persons responsible for institutional response to dangerous or emergency situations
Elaine Robinson, Interim Vice President for Academic Affairs and Dean
Elaine.robinson@spst.edu 405-208-5755
Jeanne Hoeft, Dean of Students
jhoeft@spst.edu 913-253-5019
Laura Snow, Vice President of Administration/CFO
laura.snow@spst.edu 913-253-5060
David Sisney, Vice President of Advancement
david.sisney@spst.edu 913-253-5080

1.5 Methods for emergency notification
In the event that one or both campuses are closed, classes cancelled or campus activities will be held on a delayed/alternate schedule. Announcement of closings and alternate schedules will be made via the following channels, immediately following a decision/declaration.
- e2campus mass notification system – go to www.spst.edu to sign up for an account
- Television stations in the metro area of campus affected and their websites
- Campus phone and voicemail systems
  - Kansas City Campus – (913) 253 – 5000
  - Oklahoma City University Campus emergency number – (405) 208-5871
- Email broadcast from a campus official and/or postings at entrances of campus buildings when the decision and announcement are made during regular work hours
1.6 Testing the emergency alert system
The emergency response and evacuation procedures, including e2campus alert, will be tested at least once per calendar year. The test may or may not be announced and will be followed by a notice detailing emergency response and evacuation procedures. Documentation of these tests will be kept by the Dean of Students and will include a description of the exercise, the date, time, whether it was announced or unannounced and the follow up notice regarding emergency response and evacuation procedures sent to the Saint Paul Community.

1.7 How to report a crime on campus- Resurrection
1. Always call 9-1-1 first if you’re able
2. If unable to call 9-1-1
   a. Dial "0" on a local phone for the church operator
   b. Advise as to the assistance needed
   c. If unable to speak freely:
      i. Say "Reverend Green is needed" or ask for "MICHAEL’S MINISTRY"
   d. Provide your location
3. If unable to reach the operator and/or after contacting 911
   a. call any of the following:
      Safety and Security Director, Bob Whisman 913-486-9926
      Facilities Director, Dick Cooper 913-568-9088
      Facilities Cell Phone: 913-908-2327
      Managing Director/CFO, Brent Messick 913-515-9125
   b. Say "Reverend Green is needed"
   c. Provide your location
   d. If unable to speak freely ask for: "MICHAEL'S MINISTRY"
If security assistance is required but not an emergency call the above listed telephone numbers.

How to report a crime on campus-Fox Hill
1. Always call 9-1-1 if you’re able
2. If unable to call 9-1-1, contact Dean of Students Dr. Jeanne Hoeft at 913-253-5019 or Jennifer Vargo at 913-253-5063

1.8 Reporting criminal offenses to Church of the Resurrection Personnel
In order for Saint Paul to provide timely warning reports of Clery Act Crimes, all community members should report criminal offenses to the following people after contacting local authorities.
   Safety and Security Director, Bob Whisman 913-486-9926
   Facilities Director, Dick Cooper 913-568-9088
   Facilities Cell Phone: 913-908-2327
   Managing Executive Director/CFO, Brent Messick 913-515-9125

The involvement of the entire campus community is needed in reporting any incidents or conditions considered a security risk in a timely manner to our security personnel. Reporting crimes can be voluntary and kept confidential. We ask that you make an accurate and prompt report to the police and Church of the Resurrection safety and security personnel.
Victims have the right not to provide a statement to the police department or the Church of the Resurrection Safety and Security department. However, the crime statistic (without detail) must be reported in the Annual Campus Security Report. All other relevant provisions of the Campus Security Act must be fulfilled, including the timely reporting of the event to the campus community. Only the barest details need to be reported and do not include the name, or any other descriptors pertaining to the victim.

Student organizations officially recognized by Saint Paul do not have off campus locations.

1.9 Clery Act crime timely warning
Clery Act crimes will be reported to the seminary community, by a community wide memorandum and or e-mail as soon as possible after the incident has occurred, generally within 24 to 48 hours.

SECTION TWO
Campus Security

2.1 Access to and security of facilities
Access to Church of the Resurrection building is available 7:00 am – 11:00 pm, 7 days a week excluding holidays. The building is locked and unlocked via computer program. All buildings have contact/glass break and motion sensors, and are monitored 24/7. Additionally the Leawood campus has 74 surveillance cameras recording 24/7.
Certain interior areas of the campus are kept locked and are accessed by authorized personnel using electronic key cards. Some sensitive areas are kept locked and are accessible only by Facilities Staff. Landscaping is planted and maintained to allow a clear field of vision. The parking lots and walkways are programmed to be lighted from dusk until 11:30 pm.
Access to the Fox Hill administrative offices is typically available Monday through Friday 8:00 am to 4:30 pm. Outside of regular business hours, the office is accessible only by employee ID card. The Fox Hill office building is unlocked 7:00 am-7:00 pm, outside of these hours, the building is only accessible by employee ID card.

2.2 Law enforcement authority
Off-duty Leawood Kansas Police Officers are utilized on a limited basis for specific Church of the Resurrection programming. Other Security Staff members have no Law Enforcement authority. All incidents should be reported directly to Leawood police. Incidents should also be reported to Church of the Church of the Resurrection security personnel. Persons are asked to notify the Church of the Resurrection’s Safety and Security personnel regarding any incidents on campus that are considered a security risk.
Students, staff, faculty, campus guests, and others are requested to cooperate fully with campus security offices and report promptly any crime or suspicious activity of any nature to the Police Department.
All alleged criminal offenses are turned over to the Leawood Police Department to investigate.
2.3 **Preparation of crime statistics disclosure**

Saint Paul School of Theology has prepared this report to comply with the Jeanne Clery Disclosure of Campus Security Policy and Crime Statistics Act. The Annual Security Report is published each year on or before October 1.

Crime statistics for the report are solicited from all law enforcement agencies that have or share law enforcement jurisdiction. The Dean of Students provides disciplinary actions taken concerning alcohol, drug, and weapon violations of the Student Code of Conduct.

Each year an e-mail notification is sent to all students, faculty and staff members providing the web link to access the Annual Security Report. That email will contain a brief description of the ASR contents and disclosure of the rights of interested parties to request a paper copy of the ASR and to have that copy furnished upon request. Prospective students and prospective employees may obtain this annual report from the web link.
### 2.4 Crime Statistics

#### 2.4.1 Criminal Offenses

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*statistics for 'campus housing' are also included in 'campus'

**off campus indicates public areas immediately surrounding the campus
2.5.2 Hate Crimes

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*statistics for 'campus housing' are also included in 'campus'

**off campus indicates public areas immediately surrounding the campus
### 2.5.3 Weapon, Drug and Liquor Violations

#### CHART 2.4.3 CAMPUS CRIME STATISTICS:
Weapon, drug and liquor violations

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*statistics for 'campus housing' are also included in 'campus'

**off campus indicates public areas immediately surrounding the campus
SECTION THREE
Crime Prevention

3.1 Safety and Security Education
Safety awareness programs for the community, as well as increased attention to campus security awareness during new student and employee orientation programs, will be a part of the on-going educational efforts by the seminary. When a student, or the school sees a need for a safety program one will be arranged, by tapping into the resources of the Leawood Police, and/or our own campus security department. Students, staff and faculty will be informed of campus security procedures and policies through the Community Handbook, orientation sessions and via periodic campus e-mail messages. It is vital that all members of the seminary community practice and encourage responsibility for their own security and the security of others.

3.2 Safety and Security Reminders
Consider the following tips to ensure safety, security and crime prevention on our campus, as well as anywhere else.

- Lock the doors on your vehicle when you park and leave your vehicle, even if for just a moment.
- Keep items out of sight in your car. Move things into the trunk or conceal items beneath a coat or other cover.
- Use an anti-theft device on your vehicle.
- Keep your office doors locked anytime that you step away from the location. Check the knob as you leave to confirm that it is locked and that the latch has properly engaged.
- Check to be sure that exterior building doors close, latch and lock properly when you leave or enter a building. This is particularly important at the office/program buildings at times other than regular business or class hours.
- Do not block open a locked exterior door, not for a friend who is coming over shortly, nor for the convenience of not having to use your key on frequent trips in and out of a building. It only takes a second for someone to slip into a building when an unsecured door is unattended.
- Immediately report any suspicious or unusual activity on campus to security personnel.

And, remember that it is always appropriate and wise to:

- Let someone know where you intend to be and when. This allows someone else, a family member, another student, a parishioner, or a neighbor to watch out for you. This also assists the school or others to locate you when we receive emergency calls for you.
- Stay alert and aware of your surroundings. Look around as you walk or as you enter a new space, like a building entryway, an office, or a car.
- When walking outdoors alone, keep your keys in your hand ready to open your car or building. Consider carrying pepper spray or a whistle, keeping items in your hand and ready for use.
SECTION FOUR
Alcohol and Drugs Policies

Drug-Free Campus Policy

(Adapted from the Oklahoma City University Handbook, 2013-2014; approved 11/2013)

The Drug-Free Schools and Communities Act Amendment of 1989 is a federal law, which requires all educational institutions to have and make available a clear policy regarding illegal drugs.

4.1 Prohibited Behavior
Saint Paul School of Theology forbids the unlawful distribution, possession, or use of controlled substances, illegal or illicit drugs, or alcohol by students or employees, on seminary property, as a part of seminary activities, or in any way related to seminary employment or program. Alcohol is excluded from any official function of the seminary.

Each employee of the seminary, as a condition of employment, will agree to abide by the provisions of this regulation and all applicable conditions of the Drug-Free Schools and Communities Act Amendments of 1989, and will notify the institution of any criminal drug statute conviction for a violation occurring in the workplace no later than five days after such conviction.

4.2 Institutional Sanctions
Any student who violates the provisions of this regulation is subject to disciplinary action, which may include termination of enrollment. The policies and procedures by which disciplinary action will be carried out are detailed under the Student Conduct and Status of Enrollment. Students receiving sanctions requiring treatment may use any other certified program. In any case, a student must provide proof of treatment before consideration is given to his or her reinstatement.

Notification to State and Federal Authorities
Saint Paul may refer individuals to applicable local, state, or federal law enforcement authorities for prosecution. Any student who is convicted under a criminal drug statute for a violation occurring on campus the Dean of Students (GKC) or Associate Dean (OKC) within five working days of the conviction. Within ten working days, Saint Paul School of Theology is required to notify the Department of Education of the disciplinary action. Within thirty days, Saint Paul will take appropriate disciplinary action.

A student, who is convicted of a state or federal offense involving the possession or sale of an illegal drug that occurred while the student is enrolled in school and receiving Title IV aid, is not eligible for Title IV funds. A borrower’s eligibility is based on the student’s self-certification on the Free Application for Federal Student Aid (FAFSA). Convictions that are reversed, set aside or removed from the student’s record, or a determination arising from a juvenile court proceeding do not affect eligibility and do not need to be reported by the student.

4.3 Applicable Legal Sanctions
Apart and distinct from seminary policies, employees and students who engage in the unlawful use, possession, or distribution of controlled substances, illicit or illegal drugs, or alcohol are subject to sanctions under local and municipal ordinances, Kansas statutes, Oklahoma statutes, the United States code, or other applicable local, state, and federal laws. Such sanctions could include, without limitation, fines and imprisonment.
Federal law prohibits possession, use, distribution, manufacture, or dispensing of controlled substances. The ultimate punishment for drug crimes generally depends on the quantity, classification, and purpose of possession of the drug. The most serious drug crimes are producing, manufacturing or selling illegal drugs.

Federal Drug Possession Penalties: (federal charges are not applicable unless it involves multi-state trafficking)

- First violation - a minimum fine of $1,000 but no more than $100,000, and a maximum jail term of one year.
- Second violation - a minimum fine of $2,500 but not more than $250,000, and/or minimum jail term of 15 days but not more than two years.
- Third or subsequent violation - a minimum fine of $5,000 but not more than $250,000 and/or a minimum jail term of 90 days but not more than three years.
- Federal penalties have special sentencing provisions for the possession of crack cocaine: a maximum fine of $250,000 and/or a minimum jail term of five years but not more than 20 years, if it is a first conviction and the amount of crack cocaine possessed exceeds 5 grams: second crack cocaine conviction, and the amount possessed exceeds 3 gram; third conviction and the amount possessed exceeds 1 gram.

4.4 Health Risks Associated with Abuse of Drugs and Alcohol

The use, misuse, and abuse of illicit or illegal drugs and alcohol can lead to or result in a variety of health risks. Whether the drug of choice is alcohol, marijuana, a prescription drug or cocaine, the habit can lead to a change in work habits, too. Some people may believe that drugs are harmless or even helpful. The truth is that drugs can have very serious, long-term physical and emotional health effects. And if drugs are mixed, the impact is even more detrimental. The following is a partial list of drugs and some of the consequences of their use. Only some of the known health risks are covered, and not all legal or illegal drugs are included:

- **Alcohol** is the most commonly abused substance in the work place. It produces short-term effects that include behavioral changes, impairment of judgment and coordination, greater likelihood of aggressive acts, respiratory depression, irreversible physical and mental abnormalities in newborns (fetal alcohol syndrome) and death. Long term effects include: damage to the liver, heart and brain; ulcers; gastritis; malnutrition; delirium tremens; and cancer.
- **Marijuana** impairs short-term memory comprehension, concentration, reaction time, and motivation. It may also cause paranoia and psychosis. Marijuana smoke contains more cancer-causing agents than tobacco smoke. The way marijuana is smoked enhances the risk of contracting lung disease and cancer.
- While **cocaine** and **crack** can speed up performance, their effect is short-lived. More lasting risks are short attention span, irritability and depression, seizure and heart attack.
- **Prescription drugs** are often used to reduce stress. However, they are not safe either, unless they are taken as directed. If abused, they can lead to sluggishness or hyperactivity, impaired reflexes, addiction and brain damage.
- **Other drugs**, such as **PCP, LSD, heroin, mescaline and morphine**, have a wide variety of negative health effects — from hallucinations and mental confusion to convulsions and death.
Drug and Alcohol Dependency Testing
Saint Paul may require any student or employee, who is reasonably suspected of drug use, to undergo drug testing. Drug and alcohol tests may be administered under the following conditions:

- If the employee or student exhibits conduct that would cause a reasonable person to believe that the employee is under the influence of drugs or alcohol
- If the employee demonstrates a level of job performance which suggests a drug or alcohol problem

An independent, professional laboratory will be used to test for the presence of controlled substances and alcohol when testing is necessary. Termination of employment or enrollment may occur as a result of a violation of any provision of this policy.

Available Treatment
Saint Paul does not provide drug and alcohol counseling or treatment. Students and employees with substance abuse problems are encouraged, and, in some cases, may be required to use the services of appropriate off-campus resources.

Greater Kansas City Resources

- **First Call Alcohol/Drug Prevention & Recovery** (formally known as National Council)

- **Heartland Regional Alcohol & Drug Assessment Center**
  5500 Buena Vista • Roeland Park, KS 66205 • P.O. Box 1063 • Mission, KS 66222
  Phone 913-789-0951 • Toll Free 1-800-281-0029 • Fax 913-789-0954 | website: [www.hradac.com](http://www.hradac.com) info@hradac.com

Procedure for Distribution
This policy will be distributed annually to all students and employees through its inclusion in the Community Handbook which is also available on the Saint Paul web site, [http://www.spst.edu/Handbook-Catalog](http://www.spst.edu/Handbook-Catalog).

Students at Saint Paul at Oklahoma City are subject to this policy and the policy of Oklahoma City University.

Smoke-Free Campus Policy

At its Fall 2007 meeting, the Saint Paul School of Theology Board of Trustees approved this "Smoke-Free Campus" Policy as follows: In the interests of the health of all persons who use or visit the Saint Paul School of Theology campus, which grows out of Christian loving concern for the well-being of every individual, all of the campus buildings and grounds shall be free of smoke from tobacco products effective January 1, 2008.

Saint Paul will encourage, support and assist students and employees who desire to quit smoking by reimbursing their out of pocket expenses up to $50 per month for up to 4 months of a smoking cessation program of their choosing, including consultation with a doctor and medical treatment with gum, patches and/or prescription medications. Persons may request this financial support through the Human Resources office, or the Dean of Students (GKC) and Associate Director of Contextual Education (OKC).
4.5 Review
Saint Paul will conduct biennial reviews of this policy to determine its effectiveness, to implement changes as needed, and to ensure that sanctions are consistently enforced. Reviews implemented by the Masters Committee and Director of Human Resources will:

- Conduct and evaluate an alcohol and drug use and opinion survey
- Assess effectiveness of mandatory drug treatment referrals
- Assess effectiveness of documented disciplinary actions
- Assess effectiveness of policy and information distribution.

A report of the review’s findings will be submitted to the president for approval.

SECTION FIVE
Sex Offenses

5.1 Policy on prohibiting harassment/intimidation
Commitment to Anti-Harassment, Anti-Discrimination and Anti-Retaliation
The purpose of this policy is to uphold Saint Paul School of Theology’s commitment to preserving the fundamental dignity and rights of all individuals involved in Seminary activities. Prohibited discrimination, harassment and retaliation are contrary to the education and employment values of Saint Paul School of Theology. All members of the Saint Paul community have the right to be free from harassment, discrimination and retaliation from anyone—students, faculty, staff, supervisors, co-workers or others, including clergy, congregation members, vendors, suppliers, and contractors with whom the employee or student has contact as a result of the individual’s employment, study, or contextual education ministry setting while at Saint Paul.

Preventing prohibited discrimination, harassment and retaliation is the responsibility of all members of the Saint Paul community. Possible violations of this policy (a “Concern”) should be reported as soon as possible to designated personnel noted in this policy. Every effort will be made to respond to Concerns of perceived prohibited conduct in a reasonable, thorough and timely manner. If any one feels that the Seminary has not met its obligations under this policy, that person should contact the Director of Human Resources, Dean of Students, Academic Dean (OCU), or Vice President of Academic Affairs and Dean (GKC).

- Prohibited Behaviors and Conduct
  - Discrimination
    It is a violation of this policy to discriminate on the basis of race, creed, color, religion, national origin, sex, gender, age, disability, pregnancy status, sexual orientation, veteran status or any other status protected by law, in any educational/academic or employment programs, experiences, activities, and opportunities.

- Harassment
  Saint Paul School of Theology prohibits unwelcome verbal or physical conduct that denigrates or shows hostility or aversion toward an employee or person because of race, color, sex, religion, age, national origin, disability, pregnancy status or any other protected status protected by law. This prohibition applies to all individuals who work for or with the Seminary, or other persons conducting business with Saint Paul.
  Examples of conduct prohibited by this policy include, but are not limited to, jokes, language, comments, suggestions, innuendoes or pranks that are hostile or demeaning with regard to a
protected status or have the purpose or effect of creating an intimidating, hostile, abusive or offensive environment.

- **Sexual Harassment**
  As part of the above-stated policy, no student, faculty, staff or any person may sexually harass another individual. Prohibited sexual harassment includes unwelcome sexual advances, requests for sexual favors, and other verbal or physical or other non-verbal conduct of a sexual nature when (1) submission to or rejection of such conduct is made either explicitly or implicitly a term or condition of any educational program, activity or employment; (2) submission to or rejection of such conduct by an individual is used as a basis for any education or employment decision affecting such individual; or (3) such conduct has the purpose or effect of unreasonably interfering with an individual’s education or work performance or creating an intimidating or hostile learning or working environment. Sexual violence is a prohibited form of sexual harassment. Sexual violence includes physical sexual acts perpetrated against a person’s will or where a person is incapable of giving consent due to use of drugs and/or alcohol or to an intellectual or other disability. Some examples of sexual violence may include, but are not limited to, rape, sexual assault, sexual battery, and sexual coercion.

Saint Paul School of Theology has zero tolerance for any prohibited behaviors or conduct and violators will be disciplined, up to and including expulsion or termination.

Any student or employee who has a question, concern or complaint of discrimination, including harassment based on his/her protected status or retaliation is encouraged to bring the matter to the immediate attention of the Director of Human Resources, the Dean of Students, the Academic Dean (OCU), or the Vice President of Academic Affairs and Dean (GKC). Any Saint Paul School of Theology official who becomes aware of any complaint of harassment should contact Human Resources immediately.

- **Retaliation**
  Saint Paul School of Theology prohibits retaliation against anyone for reporting discrimination/harassment, assisting in making a complaint, or cooperating in an investigation. Retaliation prohibited by this policy includes, but is not necessarily limited to, disparaging comments, uncivil behavior, or other negative treatment of an employee because a complaint was made pursuant to this policy or otherwise cooperated with Saint Paul’s investigation. Anyone who believes he/she has experienced or witnessed retaliation should immediately notify the Director of Human Resources, the Dean of Students, Academic Dean (OCU), or the Vice President of Academic Affairs (GKC).

### 5.2 POLICY ON CONSENSUAL ROMANTIC OR SEXUAL RELATIONSHIPS BETWEEN MEMBERS OF THE SAINT PAUL COMMUNITY

**Policy on Consensual Romantic or Sexual Relationships between Members of the Saint Paul Community**

Although we recognize that close personal relationships may exist or develop between members of the Saint Paul Community, including but not limited to consensual romantic relationships, appropriate limitations on such relationships are prudent.

- Romantic or sexual attention by any adult toward any minor child is absolutely prohibited. Any sexual abuse of a child will be reported according to applicable laws.
• Unsolicited, non-consensual, or coercive romantic or sexual attention between or among adults is strictly prohibited in all circumstances as detailed in the Policy Prohibiting Harassment/Intimidation.

• Any sexual relationships between or among adults are prohibited when:
  • One party has power over the other party and/or is responsible for making decisions regarding the other party’s participation in with the Saint Paul Community, such as directing, supervising, hiring, promoting, evaluating, grading, advancing, or developing the academic or employment experience of the other party to the behavior.
  • One party has a position of confidence, authority or spiritual guidance over the other party.
  • One party is a subordinate under the other party’s supervisory line of authority.
  • One party is a faculty or staff member and the other is a student.
  • One party is a student in a contextual education ministry setting and the other is a congregant within the same ministry setting and they were not spouses or partners prior to being assigned to the ministry setting.
  • There is a potential for significant interference with either party’s work or academic performance or ability to conduct himself/herself in a professional manner.
  • A conflict of interest may be created by the relationship.
  • Other situations as determined.

Students may enter into and create relationships with other students that do not violate the criteria set forth above and/or do not otherwise adversely affect the Community environment.

Consensual romantic or sexual relationships between employees (administrators, faculty and staff) of Saint Paul School of Theology may be permissible if they are not otherwise prohibited by any criterion set forth above, and/or that would not otherwise adversely affect the Community environment.

All Community members – employees and students alike – should consider carefully the potential problems inherent in such relationships. At the earliest stage of a relationship between community members where there is a power differential, or the appearance of such, that may raise questions regarding its appropriateness, the persons involved shall disclose the relationship and dialogue with their supervisor and/or vice-president level administrator for guidance on appropriate precautions to protect the interests of all parties.

Failure to follow this policy may result in disciplinary action, up to and including dismissal from employment and/or the Saint Paul Community. Saint Paul representative(s) will address any incidents or situations that are reported to them using the tools and processes detailed in the sections Guidelines for Conflict Resolution, and Investigating Complaints of Serious Misconduct against Employees and Students Guidelines.

5.3 Reporting a Sexual Assault

A sex offense is any sexual contact against another person, forcibly and/or against the person’s will; or not forcibly or against that person’s will where the victim is incapable of giving consent.

If you are a victim of a sexual assault:

• Get to a safe place
• Get medical treatment and a forensic exam
• Call the police and/or file a report with Dean of Students Dr. Jeanne Hoeft
In order to preserve evidence, even if you choose not to file a police report,

- Do not shower
- Do not eat, drink or brush your teeth
- Wear or bring the clothes you wore at the time of the assault to the hospital
- Try not to use the restroom until you are at the hospital

If you have any questions about what to do call the Metropolitan Organization for Countering Sexual Assault (MOCSA) 816-531-0233 or 913 642 -0233.

For more information about sexual assault go to:

http://www.mocsa.org/ndhlp_sxa.php

At the student’s request, Saint Paul School of Theology will assist the student in notifying the appropriate police department and/or an appropriate victim services agency such as the Metropolitan Organization to Counter Sexual Assault. If requested, Saint Paul will make appropriate and reasonable changes to a student’s academic situation, such as changing a class schedule, after an alleged sexual assault. Students in need of support following a sexual assault are encourage to contact MOCSA and/or the Dean of Students.

Procedures following an alleged sexual assault by a student will follow the Procedures for investigating Complaints of Serious Misconduct against Employees and Students, delineated below and in the Student Handbook. The victim and the accused may be accompanied by a support person, but not by legal representation, during any investigatory interviews. Saint Paul School of Theology, will upon request, disclose to the alleged victim of a forcible or non-forcible sex offense the result of any disciplinary action taken against the alleged perpetrator. Disciplinary actions may include criminal prosecution and termination from Saint Paul.

5.4 Disclosure of disciplinary proceeding results to sex offense victim

The accuser and accused will be informed of the outcome of any institutional disciplinary proceeding alleging a sex offense. The standard will be whether it is more likely than not that the charged student has violated this sex offense policy. Students found to have violated this sex offense policy will be disciplined, up to and including expulsion from the seminary. If the accuser is deceased as a result of the offense, the next of kin will be treated as the accuser for purposes of this policy.

5.5 Sex Offender Registration

The Campus Sex Crimes prevention Act of 2000 requires Saint Paul School of Theology to provide to students and employees information concerning registered sex offenders. This information can be accessed through the Kansas Bureau of Investigation at http://www.accesskansas.org/kbi/ro.shtml. Sex offenders who are students or employees at Saint Paul are required to notify the Dean of Students or the Director of Human Resources of their status.
SECTION SIX
Investigating complaints of serious misconduct against employees and students

6.1 Conflict Resolution Guidelines

• Addressing Concerns
It is Saint Paul’s belief and expectation that members of the Saint Paul community will act in good faith and with consideration and respect for one another at all times, and will avoid intentionally engaging in behavior that violates its policies.

All Concerns will be held in confidence to the extent practicable. However, confidentiality cannot be guaranteed. All participants in any concern are encouraged to respect confidentiality to protect the privacy and reputations of all individuals involved. Obviously, individuals may have appropriate and confidential discussions with a dean, supervisor, or the Human Resources Director regarding the matter. Any breach of confidentiality may result in disciplinary proceedings up to and including expulsion from the Seminary or discharge from employment under this or other applicable Seminary policies.

• Notification
Consistent with these expectations and beliefs, Saint Paul encourages and empowers, but does not require, any individual who experiences or witnesses conduct or behavior prohibited by its Policies to respectfully and appropriately notify the party engaging in the offending behavior that the behavior is unwelcome and/or offensive and/or perceived/experienced as a violation of a policy. Saint Paul further expects and encourages anyone who is notified that his or her communication, behavior or conduct is unwelcome and/or offensive to another or perceived/experienced as a violation of a Saint Paul policy, to be receptive to such information. It is expected that they be open to dialogue on the issue, as well as to be open to change/discontinue the referenced conduct/behavior, to strive for reconciliation, and not to punish or retaliate against another member of the community who respectfully and appropriately shares such information. Open, frank and respectful conversations are opportunities for mutual growth, understanding and trust, for moving from brokenness to grace, from alienation to reconciliation, and from conflict to resolution.

• Reporting procedure
In the event an offended party opts not to directly notify the offending party that his or her behavior is unwelcome and/or offensive and/or perceived/experienced as a violation of a policy, or if that notification does not result in a satisfactory resolution and reconciliation then the concerned party is encouraged to raise the matter within a reasonable time following the incident, usually within 180 days of its occurrence, with the Director of Human Resources, Dean of Students, Academic Dean (OCU) or Vice President of Academic Affairs and Dean (GKC).

• Initiating institutional procedures to address a concern
In order to allow Saint Paul to formally investigate incidents and to correct prohibited behaviors so as to prevent such prohibited behavior from worsening or repeating, the concerned party(ies) may be asked to make a written complaint to one of the above named Saint Paul representatives. The Saint Paul representative will review with the concerned party the protections and procedures provided in its policies and guide her/him in the next steps toward the option(s) selected. The concerned party may be asked to sign an acknowledgement that such did occur.
• Mediation
  When deemed appropriate, Saint Paul School of Theology will offer all concerned parties the opportunity to participate in mediation as an option for seeking and reaching a mutually satisfying resolution and reconciliation around the behavior identified by the reporting party. Only if both (all) parties agree to mediation will mediation occur. The person identified as the mediator may be someone from within or from outside the Saint Paul community following the consent/approval of the party reporting the concern(s), the party about who the concern has been reported, and Saint Paul School of Theology.

• Investigation
  If Saint Paul does not deem mediation an appropriate option, or mediation is not agreed to by all parties, or mediation does not result in a mutually satisfactory resolution, Saint Paul will initiate a formal investigation.

6.2 Investigating Complaints of Serious Misconduct against Employees and Students

• Formal Investigations of Concerns
  Saint Paul is committed to investigating and resolving concerns of behavior or conduct prohibited by its policies as confidentially, and as quickly as practicable for an effective investigation and resolution of the concern. The length, duration, and precise details of each investigation will necessarily depend on the particular circumstances under investigation. The complaints that might be investigated by this procedure include, but are not limited to, behaviors identified under the "anti-harassment/intimidation" and "consensual romantic or sexual relationships" policies.
  All Concerns deemed necessary to investigate will be promptly and thoroughly investigated by the appropriate Seminary officials, generally initiated by the Human Resources Director, the Vice President for Academic Affairs and Dean (GKC) or Academic Dean (OCU). Saint Paul will act to ensure that any improper conduct ceases immediately and corrective action is taken to prevent its recurrence. Any student, faculty, staff or other person doing business with Saint Paul will be subject to the full range of corrective action, up to and including recommending discharge or expulsion from the Seminary. Saint Paul will inform the alleging party of the resolution of the Concern as appropriate. Saint Paul will notify the alleging party of the conclusion of the investigation.

  Investigators will communicate only with those who must know of the complaint and with those who may provide facts and details about the complaint. Investigations may include interviews and review of written documents in order to gather facts and details. The findings will be formalized and provided only to those who need to know.

  Investigators will formalize their findings in a confidential written report that will be provided to the President (KC), Vice-President for Academic Affairs and Dean (KC), and, when appropriate, to the Academic Dean (OKC), and Human Resources Director, unless one is a person(s) about whom the concern was raised. Based on the report of the investigators, these persons will decide what action is appropriate to take toward the party about whom the concern has been raised. In all cases in which the party about whom a concern has been raised remains in the Saint Paul community, that party will receive a permanent instruction of non-retaliation. Additional action taken with respect to the party about whom a complaint has been raised could include any of the following, or a combination:
  o closure with no further action toward the party about whom the complaint has been raised (except the permanent instruction of non-retaliation)
- review with the party about whom the complaint has been raised of Saint Paul’s policies
  - and expectations
  - suspension
  - demotion
  - transfer away from complainant
  - final written warning
  - individualized training
  - termination or removal from the Saint Paul community OR
  - other action Saint Paul determines appropriate under the circumstances

- All Concerns will be treated confidentially to the extent practicable for effective resolution. No person will suffer direct employment or educational consequences or retaliation as a result of making a good faith report or taking part in the investigation of a Concern. An individual who knowingly alleges a knowingly false or frivolous Concern against another will be subject the full range of corrective actions, up to and including expulsion and/or termination from the Seminary.