



2018 Annual Security Report

(including Annual Fire Safety Report)

Kansas Campus

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POLICIES FOR PREPARING THE ANNUAL SECURITY REPORT

Saint Paul School of Theology prepares this report to comply with the Jeanne Clery Disclosure of Campus Security Policy and Crime Statistics Act. The full text of this report is available on our web site at www.spst.edu under “Safety and Security.” This report is prepared in cooperation with the local law enforcement agencies surrounding our campuses, Fox Hill offices, and Avila University library. We gather information from Oklahoma City University (OCU), Avila University (AU), and the Church of the Resurrection (Resurrection) to ensure accuracy in reporting. Each entity provides updated information on their educational efforts and programs to comply with the Act.

Campus crime, arrest and referral statistics include those reported by designated campus officials (campus security authorities), local law enforcement agencies, and the OCU Police. These statistics may also include crimes that have occurred in private residences or businesses and is not required by law.

The Annual Security Report (ASR) is published each year on or before October 1. When the report becomes available, an email notification is sent to all students, faculty and staff members providing the web link to access the ASR. Copies of the report may also be obtained by contacting the Associate Dean of Student Affairs (ADSA). All prospective employees may obtain a copy from Human Resources (HR). Prospective students will receive notification at time of application.

Annual Security Report Responsibilities. Saint Paul School of Theology’s Associate Dean of Student Affairs is the Campus Security Authority (CSA), and is responsible, under the supervision of the Vice President for Academic Affairs and Dean (VPAAD/Clery Compliance Officer), for:

1. Oversight and coordinating the creation of the ASR.
2. Working with security personnel and local law enforcement officials in Kansas and Oklahoma 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.

REPORTING OF CRIMINAL OFFENSES

Community members, students, faculty, staff, and guests should report all crimes, public safety-related incidents, and emergency situations to:

Jeanne Hoeft, Vice President for Academic Affairs and Dean, Clery Compliance Officer
913.253-5019 jhoeft@spst.edu

Matthew Mills, Chief Financial Officer, and Chief Operation Officer
913.253-5060 matthew.mills@spst.edu

Campus Security Authorities (CSA):

Margaretta Narcisse, Associate Dean of Student Affairs,
913-253-5097 (KS) or 405-208-5758 (OK) margaretta.narcisse@spst.edu

Leanna Walkowiak, Equity Compliance Officer (ECO).
913-253-5091 leanna.walkowiak@spst.edu

VOLUNTARY CONFIDENTIAL REPORTING

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 department, CSA, and ECO (if applicable). The CSA will share the report with Church of the Resurrection safety and security personnel.

Victims or witnesses have the right not to provide a statement to the CSA, ECO, police department or the Church of the Resurrection Safety and Security department. If the victim or witness of a crime and does not want to pursue action on campus system or the criminal justice system, they may still want to consider making a confidential report. With explicit permission, the CSA can file a report on the details of the incident without revealing the person's identity. The purpose of a confidential report is to comply with the wish to keep the matter confidential, while taking steps to ensure the future safety of the person and others. With such information, SPST can keep an accurate record of the number of incidents involving students, determine where there is a pattern of crime with regard to a particular location, method, or assailant, and alert the campus community to potential danger. Reports filed in this manner are counted and disclosed in the annual crime statistics for the institution.

In order for Saint Paul to provide timely warning reports of Clery Act Crimes, the CSA will report criminal offenses to the following Church of the Resurrection safety and security personnel after local authorities have been contacted:

- Safety and Security Director - Pat McCarthy, 913-544-0264 (office), 913-244-9700 (mobile)
- Director of Facilities - Dick Cooper, 913-544-0776 (office), 913-568-9088 (mobile)
- Facilities Cell Phone - 913-908-2327
- Executive Director of Central Resources & Chief Financial Officer - Rachel Svaty Condon, 913-544-0770 (office)

SECURITY OF AND ACCESS TO CAMPUS FACILITIES

Although Saint Paul School of Theology does not own the buildings in which we conduct our classes and administrative support work, our goal is to ensure a safe and secure campus environment for all students, employees, and visitors. SPST buildings are accessible to the public during normal building hours. With the exception of essential personnel and services, and others as designated, buildings are locked and access is permitted only with proper authorization and identification.

Access to Kansas Campus. *August 1st 2018 the Fox Hill administrative offices relocated to the Kansas campus, 13720 Roe Ave., Building C, Leawood, Kansas.*

Access to the Kansas campus located in building C at Church of the Resurrection 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 Kansas campus has 74 surveillance cameras recording 24/7.

Certain interior areas of the Kansas 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.

In order to protect the safety and welfare of students and employees of SPST, all persons on SPST designated space behaving in a suspicious or threatening manner will be asked to leave the campus. The CSA is available to assist with this request.

LAW ENFORCEMENT AND JURISDICTION POLICY STATEMENTS

A. Law Enforcement Relationships and Jurisdiction

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 occurring at the Kansas campus should be reported directly to Leawood police. Incidents should also be reported to the Church of the Resurrection security personnel and ECO. 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.

Incidents occurring on the Kansas campus should be reported to the applicable police and campus security departments below, as well as to the CSA and/or ECO (if applicable).

Church of the Resurrection Security Office Pat McCarthy, Safety and Security Director 13720 Roe Ave. Leawood, KS 66224 Non-emergency: 913-544-264 Emergency: 911	Leawood Police Department 4201 Town Center Dr. Leawood, KS 66211 Non-emergency: 913-642-7700 Emergency: 911
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B. Authority to Arrest and Relationships

Saint Paul desires to maintain a secure and accessible campus for students, employees, and guests. Church of the Resurrection security personnel do not have the authority to detain or make an arrest.

SPST works closely with local police departments, who are trained and certified under the guidelines of the state's Police Officer Standards and Training Commission and are sworn officers with full powers to arrest. They are also empowered and mandated to enforce all applicable federal and state laws and local ordinances.

C. Accurate and Prompt Reporting

Prompt and accurate reporting of criminal offenses aids in providing timely response and timely warning notices to the community when appropriate, and assists in compiling accurate crime statistics. Should a victim be unable to report, though willing, the victim may request someone to report on his/her behalf. This should be designated in writing or by other verifiable means.

Community members, students, faculty, staff, and guests are encouraged to report all crimes and public safety related incidents in an accurate and timely manner to the CSA, ECO, or local law enforcement. The CSA will share the report with Church of the Resurrection security personnel.

D. Confidential Reporting – Pastoral and Professional Counselors

In certain instances, a crime victim may be reluctant to file a report fearing the process and/or loss of his/her anonymity. In such circumstances, crime victims are encouraged to consider making a confidential report to one of the designated Campus Security Authorities. At a minimum, crime victims will receive valuable counseling and referral information. Confidential reports are important because they provide valuable information that will enhance the safety of the community-at-large and provide a more accurate depiction of actual campus crime.

If a victim of a crime does not want to pursue action on campus or the criminal justice system, he/she may still want to consider making a confidential report. The CSA can file a report on the details of the incident without revealing the victim's identity. The purpose of a confidential report is to comply with the victim's wish to keep the matter confidential, while taking steps to ensure the future safety of the victim and others. With such information, Saint Paul can keep an accurate record of the number of incidents involving students, determine if there is a pattern of crime with regard to a particular location, method, or assailant, and alert the campus community to potential danger. Reports filed in this manner are counted and disclosed in the annual crimes statistics for Saint Paul.

None of Saint Paul's employees meets the criteria of being a "Pastoral Counselor" or "Professional Counselor." Conversations will not be considered confidential counseling for the purposes of reporting crimes for annual disclosure.

MONITORING AND RECORDING OF CRIMINAL ACTIVITY

SPST relies on its close working relationships with Resurrection security personnel to receive information about incidents on campus, as well as with local law enforcement agencies about incidents occurring at non-campus or public property locations.

The Church of the Resurrection Security Office maintains incident reports in both electronic and hard copy format. In the case of a criminal offense, a police report would be made with the Leawood Police Department and a hard copy kept on file. Internal incident reports are made on accidents, medical incidents, criminal activity, sexual impropriety, and miscellaneous incidents. Should an incident be reported to the Church of the Resurrection Security Office without contacting the SPST CSA, the Security Office will notify the CSA directly.

The CSAs will actively investigate any crime information received concerning or involving a member of the campus community. If SPST is notified of a situation in which a campus community member is the victim of a crime, the President or a Vice President may issue a timely warning detailing the incident and providing tips so that other community members may avoid similar incidents.

Saint Paul School of Theology student organizations do not maintain any off-campus locations.

POLICIES FOR TIMELY WARNINGS

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.

1. A timely warning will be issued for any Clery Act crime that occurs at Saint Paul School of Theology on campus, public, or non-campus locations in the following circumstances:
 - a. The crime is reported to campus security authorities or local police agencies; and

- b. The crime is considered by the institution to represent a serious or continuing threat to students and employees.

Timely warnings may also be issued for non-Clery Act crimes that are deemed to pose a serious or continuing threat to the campus community.

2. Campus Security Officers – or in some instances, other employees, students, visitors, or local law enforcement – may provide information about crimes that require a timely warning to the community. This information will be reported to the President or a Vice President of Saint Paul in order to determine the need for a timely warning message and the portion of the community to which the message should be sent. In the event that a situation arises, either on or off campus, that, in the judgment of the President or a Vice President, constitutes an ongoing or continuing threat, a campus wide “timely warning” will be issued.
3. The President or Vice President will then instruct the Director of Communications or Executive Assistant to issue a timely warning by School Messenger and email that indicates the nature of the crime, the continuing danger to the campus community, and other such information that will ensure the safety and security of the campus community (such as warnings to lock vehicles or not to travel alone across a campus at night).

EMERGENCY NOTIFICATION POLICY

This policy describes notification of campus community or particular segments of the community upon confirmation of a significant emergency or dangerous situation involving an immediate threat to the health or safety of students or employees on one or both campuses of Saint Paul.

Emergency reports can be received in a number of ways: through a report to the Campus Security Authority; from one of Saint Paul’s collaborative partners such as Resurrection, or OCU; via local media or local authorities. In order to ensure immediate notification, potential emergencies should be reported to the President or a Vice President of Saint Paul, who is given the authority to confirm the nature of the emergency, as well as the portion of the campus community requiring notification and/or response or evacuation. Due to the size of the Saint Paul community, normally the entire community at both campuses will be notified. The President or Vice President may seek to confirm the emergency with local authorities or a collaborative entity. The President or Vice President will then instruct the Director of Communications or Executive Assistant to immediately send an School Messenger notification about the situation and the response to be taken.

The President or Vice President will, without delay, and taking into account the safety of the community, determine the content of the notification and initiate the notification system, unless issuing a notification will, in the professional judgment of responsible authorities, compromise efforts to assist a victim or to contain, respond to, or otherwise mitigate the emergency.

The persons responsible for initiating emergency notifications include:

- President
- Vice President of Academic Affairs and Dean
- Vice President of Advancement
- Chief Financial Officer

Saint Paul uses the School Messenger notification program to send, via text, time-critical messages to the user’s cell phone and/or email. Students and employees receive immediate notice of class cancellations,

campus closures, and campus emergencies. All students and community will receive an email copy of School Messenger messages via their Saint Paul email account automatically or may sign up for text messages on their cell phone. The School Messenger mass notifications is used for time-critical urgent messages issued by a School Messenger power user as instructed by a senior administrator. On campus emergencies may also utilize immediate in-person notifications to evacuate or take other actions.

EMERGENCY DRILLS, TESTING, AND EVACUATION PROCEDURES

The emergency response and evacuation procedures, including School Messenger alert, will be tested at least twice per calendar year. The test may or may not be announced and will be followed by a campus community notice detailing emergency response and evacuation procedures. The CCO will schedule emergency testing for SPST in the fall and spring or summer sessions. The Leadership Team will be notified of the scheduled testing. CSA will be responsible for observing and evaluating responses, including the functioning of the School Messenger system. The CCO will report results to the Leadership Team for evaluation and revision of the system. Documentation will include a description of the exercise, the date, time and whether it was announced or unannounced. Documentation of the emergency testing and evaluation will be kept in the Dean of Students secure files on the SPST server.

PROGRAMS TO PREVENT DATING VIOLENCE, DOMESTIC VIOLENCE, SEXUAL ASSAULT, AND STALKING POLICY STATEMENTS

SPST conducts anti-harassment training twice a year as its primary prevention and awareness program. This training is mandatory for new students and employees and is available to the whole community. Students and employees are required to complete this yearly. The anti-harassment training will include, but not be limited to, the following:

- a. Prevention of sexual abuse, including the seminary's definition of "consent".
- b. Information related to Saint Paul's policies on anti-harassment, anti-discrimination, and anti-retaliation, including procedures for reporting violations.
- c. Information related to Saint Paul's policies on consensual romantic and sexual relationships, including potential consequences for violations of this policy.
- d. Procedures students or employees should follow if an offense of dating violence, domestic violence, sexual assault, or stalking occurs at any Saint Paul campus, public, or non-campus location.
- e. Procedures for campus disciplinary action in cases of an alleged offense of stalking or sexual, domestic, or dating violence, including a clear statement that:
 - 1) The accuser and the accused are entitled to the same opportunities to have others present during a disciplinary proceeding; and
 - 2) Both the accuser and the accused must be informed of the outcome of any institutional disciplinary proceeding that is brought alleging an offense of stalking or sexual, domestic, or dating violence.
- f. Sanctions that may be imposed for violations of sexual offenses not described in b. and c. above.
- g. Advising of where law enforcement agency information concerning registered sex offenders may be obtained.

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. Prohibited behaviors include dating violence, domestic violence, sexual assault, and stalking.

Following our initial training and awareness program for Violence Against Women Act (VAWA) crimes and sexual harassment and violence prevention, Saint Paul holds at least two events throughout the year during our weekly Community Formation time to deepen student and employee understanding.

Definitions

Consent is the affirmative, unambiguous, and voluntary agreement to engage in a specific sexual activity during a sexual encounter. Members of the Saint Paul community are expected to comply with the notion that “no means no” without exception. When in doubt, always err on the side of “no.” Moreover, an individual who is incapacitated in some manner, whether physically or mentally, due to the effects of drugs or alcohol or for any other reason, or is asleep, or is placed under threat, coercion, duress, intimidation, or force cannot give consent. The existence of a prior relationship or previous sexual activity does not constitute consent.

Sexual assault is actual or attempted sexual contact with another person without that person’s consent. This includes, but is not limited to:

- a. Intentional touching of another person’s intimate parts without that person’s consent,
- b. Other intentional sexual contact with another person without that person’s consent,
- c. Coercing, forcing, or attempting to coerce or force a person to touch another person’s intimate parts without that person’s consent, or
- d. Rape, which is penetration, no matter how slight, of (1) the vagina or anus of a person by any body part of another person or by an object, or (2) the mouth of a person by a sex organ or another person, without that person’s consent.

Dating violence means violence committed by a person--

- a. who is or has been in a social relationship of a romantic or intimate nature with the victim; and
- b. where the existence of such a relationship shall be determined based on a consideration of the following factors:
 - i. The length of the relationship.
 - ii. The type of relationship.
 - iii. The frequency of interaction between the persons involved in the relationship.

It also includes controlling, abusive, and aggressive behavior in a romantic relationship.

Domestic violence (domestic abuse, spousal abuse, intimate partner violence, battery) includes violence and emotional abusive behavior used by one person in a relationship to control another. The violence may be criminal and include physical assault, sexual abuse, stalking, emotional/verbal, psychological and financial abuse or intimidation.

Stalking is unwanted or obsessive attention by an individual or group toward another person and may include following the victim in person or monitoring them. It is engaging in a course of conduct directed at a specific person that could cause a reasonable person to:

- a. Fear for his or her safety or the safety of others;
- b. Suffer substantial emotional distress.

Bystander Intervention

Bystanders play a critical role in the prevention of sexual and relationship violence. They are individuals who observe or witness violence. They are not directly involved but have the choice to intervene. SPST wants to promote a culture of community accountability where bystanders are actively engaged in the prevention of violence without causing further harm. If you or someone else is in immediate danger dial 911. The following is a list of some ways to be an active bystander:

- Watch out for friends and fellow students/ employees. If you see someone who looks like they could be in trouble ask if they are ok.

- Confront people who seclude, hit on, try to make out with, or have sex with people who are incapacitated.
- Speak up when someone discusses plans to take advantage of another person.
- Believe someone who discloses sexual assault, abusive behavior, or experience with stalking.
- Refer people to on or off campus resources for support in health, counseling or legal assistance.
- Encourage victim and/or personally report the event to the Equity Compliance Officer (ECO).
(*Bystander intervention strategies adapted from Stanford University*)

Information on risk reduction

With no intent to victim blame and recognizing that only rapists are responsible for rape, the following are strategies to reduce one's risk of sexual assault or harassment (whether on or off campus):

- Choose open, well-lit and well-traveled areas.
- Travel with a friend or in a group.
- Avoid dark, vacant, or deserted areas.
- When walking, you should walk facing traffic.
- Be cautious of drivers who stop to talk to you.
- Dress in clothes and shoes that won't hamper movement.
- If you sense trouble, move away from the potential threat if possible.
- Join any group of people nearby or cross the street and increase your pace.
- If a threatening situation is imminent and people are close by, yell, scream, or make a commotion in any way you can to get their attention. Remember: if you yell "help," people tend to leave you and go to get help. If you yell "fire," people will often come towards you.
- Be alert and aware of your surroundings! Giving the appearance of not paying attention and not being alert is what offenders look for in a victim.
- Never hitchhike!
- Always tell someone where you'll be and what time you are going to return.
- Do not wear headphones while walking or jogging.
- Do not read while walking or standing on the street.
- Do not leave your drink unattended.
- Do not accept drinks from people you don't know or trust.
- If you suspect someone has been drugged, contact law enforcement immediately.
- Be true to yourself don't do feel obligated to do anything you don't want to do.
- TRUST YOUR INSTINCTS. If something feels wrong, something probably is wrong.

(*Adapted from Oklahoma City University 2014 ASR*)

PROCEDURES TO FOLLOW IF A CRIME OF SEXUAL ASSAULT, DOMESTIC VIOLENCE, DATING VIOLENCE, OR STALKING HAS OCCURRED

Any student or employee who has a question, concern, or complaint of sexual assault, domestic violence, dating violence, or stalking is encouraged to bring the matter to the immediate attention of the Associate Dean of Student Affairs, Equity Compliance Officer, or the Vice President of Academic Affairs and Dean. Any Saint Paul School of Theology official who becomes aware of any of these offenses are strongly encouraged to make immediate and accurate reports of the crime to the appropriate SPST staff and/or to the appropriate local law enforcement agency. In addition, SPST employees are required to report information they receive about sexual assault, domestic violence, dating violence, or stalking to the Equity Compliance Officer.

If a victim is unwilling or unable to make a report on the victim's own behalf, individuals aware of the crime should contact the police to make a report. At the victim's request, SPST will assist the victim in notifying the campus security, appropriate police department, and/or an appropriate victim services agency in the area. The student or employee should also be made aware that he or she may decline to notify such authorities. Where applicable, the victim will also be made aware of the rights of victims regarding orders of protection, no contact orders, restraining orders, or similar lawful orders issued by a criminal, civil, or tribal court and will be assisted by a CSA or the ECO in requesting these services, if needed.

If you are a victim of sexual assault, domestic violence, dating violence, or stalking:

- Get to a safe place
- Get medical treatment and a forensic exam
- Call the police and/or file a report with CSA Margaretta Narcisse

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/act of violence 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.

There may be consequences to waiting to file a police report. Early reports may improve preparation for prosecution. Filing a police report immediately following the incident does not force the complainant to file charges and prosecute. However, it does aid in the preservation of valuable evidence if the complainant decides to pursue charges at a later date. The complainant may decline to notify campus police and authorities.

CONFIDENTIALITY

If someone is the victim of a crime and does not want to pursue action within the University system or the criminal justice system, they may still want to consider making a confidential report. With explicit permission, the CSA can file a report on the details of the incident without revealing the person's identity. The purpose of a confidential report is to comply with the wish to keep the matter confidential, while taking steps to ensure the future safety of the person and others. With such information, SPST can keep an accurate record of the number of incidents involving students, determine where there is a pattern of crime with regard to a particular location, method, or assailant, and alert the campus community to potential danger. Reports filed in this manner are counted and disclosed in the annual crimes statistics for the institution.

To the extent permissible by law, SPST will not disclose any identifying information about the victim or other necessary parties in any publicly available records without the prior written consent of the victim or party. SPST will maintain as confidential any accommodations or protective measures provided to the victim, to the extent that maintaining such confidentiality will not interfere with the ability of SPST to provide such accommodations or protective measures.

WRITTEN NOTIFICATION

After an incident has occurred, SPST will provide written notification to students and employees about existing counseling, health, mental health, victim advocacy, legal assistance, visa and immigration assistance, student financial aid, and other services available to victims, offered by SPST and in the community. Some of these services are described in the *Student Handbook*. To request further information on these services, students and employees are encouraged to contact their applicable CSA or the ECO.

Saint Paul will also notify the victim in writing of the available options and assistance to request protective measures and/or appropriate and reasonable changes to the victim's academic (such as changing a class schedule), living, transportation, and working situations after an alleged incident of sexual, domestic, or dating violence or stalking. These accommodations or protective measures are available if the victim requests them and if they are reasonable available, regardless of whether the victim chooses to report the crime to the campus security or local law enforcement.

Whether the dating violence, domestic violence, sexual assault, or staking occurred on or off-campus, SPST will provide the student or employee a written explanation of his/her rights and options.

Saint Paul takes allegations of sexual assault, domestic violence, dating violence, and stalking very seriously. Such allegations will be investigated by the Equity Compliance Officer or his/her designee through a fair and impartial disciplinary proceedings. Disciplinary actions may include up to expulsion or termination from the Seminary, as well as criminal prosecution.

Students or employees in need of support following an incident are encouraged to contact local advocacy agency and/or the Associate Dean of Student Affairs or Equity Compliance Officer.

REGISTERED SEX OFFENDER POLICY STATEMENT

The Campus Sex Crimes Prevention Act of 2000 requires SPST 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> or the Oklahoma Department of Corrections at <http://docapp8.doc.state.ok.us/>. Students or employees of Saint Paul who are registered sex offenders are required to notify the Associate Dean of Student Affairs of their status.

DISCIPLINARY PROCEDURES – POLICY STATEMENTS

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 complaint. 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, dating violence, domestic violence, sexual assault, and stalking.

Student disciplinary proceedings will take the following steps:

- Any person who has a complaint against a student is encouraged to bring the matter to the immediate attention of the ADSA, VPAAD, or directly to the ECO. Any Saint Paul School of Theology official who becomes aware of any complaint of stalking or sexual, domestic, or dating violence should contact the ECO immediately.

- Within 48 hours of the receipt of a complaint the VPAAD (for non-sexual offenses) or the ECO (for sexual, domestic, and dating violence and stalking-related offenses) will appoint a primary investigator, charged with completing a prompt, fair, and impartial review process from the initial investigation to the final result. This investigation may include interviews and written statements, as well as other pertinent materials. The investigation normally should be completed within 2 weeks. If the complaint is against the VPAAD, the CFO/HR will be responsible for appointing an investigator. If the complaint is against the ECO, the CFO/HR will be responsible for appointing an investigator.
- Saint Paul will act to ensure that any improper conduct ceases immediately and corrective action is taken to prevent its recurrence.
- Investigations, under the purview of the ECO, will be conducted by officials who, at minimum, receive annual training on the issues related to domestic violence, dating violence, sexual assault, and stalking, as well as how to conduct an investigation and hearing process that protects the safety of victims and promotes accountability. 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, hearings, and review of written documents in order to gather facts and details. The accuser and the accused will be provided with the same opportunities to have others present during any institutional disciplinary proceeding, including the opportunity to be accompanied to any related meeting or proceeding by the advisor of their choice. Such advisors may speak only at the request of the investigator.
- Investigators will formalize their findings in a confidential written report that will be provided to the Vice-President for Academic Affairs and Dean or Equity Compliance Officer, and, when appropriate, to the Associate Dean of Student Affairs. Affirmative judgments will be made based upon the preponderance of evidence, suggesting the available evidence points to a greater probability that the offense did occur. These findings will be forwarded to the VPAAD (non-sexual offenses) or ECO (sexual offenses) for action. Depending upon the severity of the offense, and taking into account particularities of the case, the VPAAD or ECO may impose one or more of the following: Closure with no further action toward the accused (except instruction of non-retaliation); restriction on living accommodations; restitution; transfer to the other Saint Paul campus; required training or counseling with documentation of successful completion; suspension from classes for a period of time from one week to a full semester; or disenrollment for a period of one year, after which a student may petition for reinstatement (with no guarantee of approval). Other sanctions may be imposed in light of particular circumstances. Final disposition should be made within 30 days of the complaint.
- Appeals related to the findings or actions taken may be made to the President of Saint Paul School of Theology. Such appeals must be made within 7 days of receiving the VPAAD's or ECO's determination of follow-on actions. The President's determination will be final.
- All complaints 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 complaint. An individual who knowingly alleges a false or frivolous complaint against another will be subject to the full range of corrective actions, up to and including expulsion and/or termination from the Seminary.
- Saint Paul will provide, as reasonably possible, protection to a student or employee such as changing a class schedule, living assignments, transportation, escorts, and working situations after an allegation

is levied. The type of protective measures to be provided will be considered on a case-by-case basis by the investigator.

Saint Paul will simultaneously inform the alleging party and the accused, in writing, of the result of any institutional disciplinary proceeding that arises from an allegation of dating violence, domestic violence, sexual assault, or stalking. Both parties will also be notified in writing of their right to appeal the outcome of the disciplinary proceeding, as well as the procedures for doing so. Both parties shall receive simultaneous written notice of any change to the results, as well as when such results become final.

Employee disciplinary proceedings will take the following steps:

- Any person who has a complaint against an employee is encouraged to bring the matter to the immediate attention of the ADSA, VPAAD, or directly to the ECO. Any Saint Paul School of Theology official who becomes aware of any complaint of stalking or sexual, domestic, or dating violence should contact the ECO immediately.
- Within 48 hours of the receipt of a complaint the VPAAD (for non-sexual offenses related to faculty), the CFO/HR (for non-sexual offenses related to non-faculty employees) or the ECO (for sexual, domestic, and dating violence and stalking-related offenses) will appoint a primary investigator, charged with completing a prompt, fair, and impartial review process from the initial investigation to the final result. This investigation may include interviews and written statements, as well as other pertinent materials. The investigation normally should be completed within 2 weeks. If the complaint is against the VPAAD, the CFO/HR will be responsible for appointing an investigator in the case of non-sexual offenses. If the complaint is against the ECO, the CFO/HR will be responsible for appointing an investigator. If the complaint is against the CFO/HR, the VPAAD will be responsible in the case of non-sexual offenses.
- Saint Paul will act to ensure that any improper conduct ceases immediately and corrective action is taken to prevent its recurrence.
- Investigations, under the purview of the ECO, will be conducted by officials who, at minimum, receive annual training on the issues related to domestic violence, dating violence, sexual assault, and stalking, as well as how to conduct an investigation and hearing process that protects the safety of victims and promotes accountability. 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, hearings, and review of written documents in order to gather facts and details. The accuser and the accused will be provided with the same opportunities to have others present during any institutional disciplinary proceeding, including the opportunity to be accompanied to any related meeting or proceeding by the advisor of their choice. Such advisors may speak only at the request of the investigator.
- Investigators will formalize their findings in a confidential written report that will be provided to the Vice-President for Academic Affairs and Dean (in the case of faculty), the CFO/HR (in the case of non-faculty employees) or Equity Compliance Officer (for sexual offenses). Affirmative judgments will be made based upon the preponderance of evidence, suggesting the available evidence points to a greater probability that the offense did occur. These findings will be forwarded to the VPAAD (non-sexual offenses by faculty), CFO/HR (non-sexual offenses by staff) or ECO (sexual offenses) for action. Depending upon the severity of the offense, and taking into account particularities of the case, the VPAAD, CFO/HR, or ECO may impose one or more of the following: Closure with no further

action toward the accused (except instruction of non-retaliation); restriction on living accommodations; restitution; transfer to the other Saint Paul campus; required training or counseling with documentation of successful completion; suspension from work for a designated period of time; or termination of employment. In the case of faculty termination, procedures in the *Faculty Handbook* will be followed. Other sanctions may be imposed in light of particular circumstances. Final disposition should be made within 30 days of the complaint.

- Appeals related to the findings or actions taken may be made to the President of Saint Paul School of Theology. Such appeals must be made within 7 days of receiving the VPAAD's, CFO's, or ECO's determination of follow-on actions. The President's determination will be final.
- All complaints 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 complaint. An individual who knowingly alleges a false or frivolous complaint against another will be subject to the full range of corrective actions, up to and including expulsion and/or termination from the Seminary.
- Saint Paul will provide, as reasonably possible, protection to a student or employee such as changing a class schedule, living assignments, transportation, escorts, and working situations after an allegation is levied. The type of protective measures to be provided will be considered on a case-by-case basis by the investigator.

Saint Paul will simultaneously inform the alleging party and the accused, in writing, of the result of any institutional disciplinary proceeding that arises from an allegation of dating violence, domestic violence, sexual assault, or stalking. Both parties will also be notified in writing of their right to appeal the outcome of the disciplinary proceeding, as well as the procedures for doing so. Both parties shall receive simultaneous written notice of any change to the results, as well as when such results become final.

DISCLOSURE OF RESULTS OF DISCIPLINARY PROCEEDINGS POLICY STATEMENT

Upon request, SPST will disclose the results of any disciplinary proceeding conducted by the institution against a student who is the alleged perpetrator of any crime of violence or non-forcible sex offense to the alleged victim or next of kin, if the victim is deceased. This request must be made in writing to the Equity Compliance Officer (ECO) or Vice President for Academic Affairs and Dean (VPAAD).

SECURITY AWARENESS AND CRIME PREVENTION PROGRAMS POLICY STATEMENT

Saint Paul School of Theology is committed to ensure a safe and secure campus environment for all students, employees, and visitors. Safety awareness begins with new student orientation and employee notification, where initial information is provided to new members of the community depending on the campus where they are located. This training includes personal safety and crime prevention awareness. Sexual assault prevention training is included in the anti-harassment training provided by the seminary twice a year to all students and employees (and is required of new members in the community).

Once a year, Saint Paul will distribute community-wide reminders related to security awareness.

DRUG, ALCOHOL, AND SUBSTANCE ABUSE POLICY STATEMENTS

Saint Paul School of Theology forbids the unlawful distribution, sale, 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.

Notification to State and Federal Authorities. Saint Paul may refer individuals -- whether students, employees, or visitors -- 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 must notify the Associate Dean of Student Affairs 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.

Any employee convicted under a criminal drug statute for a violation occurring on campus must notify HR within five working days of the conviction. Within thirty days, Saint Paul will take appropriate disciplinary action.

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.

Drug and Alcohol Abuse Prevention Program. At least once a year, a community conversation will be held to address drug and alcohol abuse prevention. At various times, the seminary will draw on the resources of Oklahoma City University or the larger church community to offer programming related to drug and alcohol abuse prevention and awareness.

MISSING STUDENT NOTIFICATION POLICY

Although Saint Paul does not have on-campus housing facilities, the following policy applies for those SPST students residing (through collaborative agreements) at Oklahoma City University:

1. If a member of the Saint Paul School of Theology community has reason to believe that a student who resides in on-campus housing at Oklahoma City University is missing more than 24 hours, he or she should immediately notify the Associate Dean of Student Affairs, who will immediately contact the appropriate law enforcement agencies to generate a missing person report and initiate an investigation.

2. In addition to the general emergency contact in (1) above, students who reside in on-campus housing have the option to identify to the Associate Dean of Student Affairs an individual to be contacted in the event the student is determined to be missing for more than 24 hours. When providing contact information, it will be treated as confidential and used only for the purpose of making a missing student notification. If a student has identified such an individual, the Associate Dean will notify the designated person no later than 24 hours after the student is determined to be missing. A student's confidential contact information will be accessible only by authorized campus officials and law enforcement in the course of the investigation. In the rare instance that a Saint Paul student is under 18 years of age and not emancipated, a legal guardian must also be notified within 24 hours.

CRIME STATISTICS

The following statistics are reported for the Saint Paul Kansas campus only.

Criminal Offenses	On-Campus						Public Property		
	2015		2016		2017		2015	2016	2017
	Housing	Total	Housing	Total	Housing	Total			
Murder/Non-negligent Manslaughter	0	0	0	0	0	0	0	0	
Negligent Manslaughter	0	0	0	0	0	0	0	0	
Sex Offenses - Forcible:									
Rape	0	0	0	0	0	0	0	0	
Fondling	0	0	0	0	0	0	0	0	
Sex Offenses – Non-forcible:									
Incest	0	0	0	0	0	0	0	0	
Statutory Rape	0	0	0	0	0	0	0	0	
Robbery	0	0	0	0	0	0	0	0	
Aggravated Assault	0	0	0	0	0	1	1	2	
Burglary	0	0	0	0	0	0	2	0	
Motor Vehicle Theft	0	0	0	0	1	1	0	12	
Arson	0	0	0	0	0	0	0	0	

Note: Saint Paul Kansas campus does not currently control any non-campus property.

*2014 motor vehicle theft on public property was reduced from 7 to 0. Previous report included other types of theft.

VAWA CRIMES REPORTING

VAWA Offenses	On-Campus						Public Property		
	2015		2016		2017		2015	2016	2017
	Housing	Total	Housing	Total	Housing	Total			
Domestic Violence	0	0	0	0	0	0	0	0	
Dating Violence	0	0	0	0	0	0	0	0	
Stalking	0	0	0	1	0	0	0	0	

Note: SPST: Kansas campus does not currently control any non-campus property.

HATE CRIMES REPORTING

Hate Crimes	On-Campus						Public Property		
	2015		2016		2017		2015	2016	2017
	Housing	Total	Housing	Total	Housing	Total			
Murder/Non-negligent Manslaughter	0	0	0	0	0	0	0	0	
Sex Offenses - Forcible:									
Rape	0	0	0	0	0	0	0	0	
Fondling	0	0	0	0	0	0	0	0	
Sex Offenses – Non-forcible:									
Incest	0	0	0	0	0	0	0	0	
Statutory Rape	0	0	0	0	0	0	0	0	
Robbery	0	0	0	0	0	0	0	0	
Aggravated Assault	0	0	0	0	0	0	0	0	
Burglary	0	0	0	0	0	0	0	0	
Motor Vehicle Theft	0	0	0	0	0	0	0	0	
Arson	0	0	0	0	0	0	0	0	
Simple Assault	0	0	0	0	0	0	0	0	
Larceny/Theft	0	0	0	0	0	0	0	0	
Intimidation	0	0	0	0	0	0	0	0	
Destruction/Damage/Vandalism of Property	0	0	0	0	0	0	0	0	

Note: SPST: Kansas campus does not currently control any non-campus property.

ARRESTS, DISCIPLINARY ACTIONS/REFERRALS, AND UNFOUNDED CRIMES

Arrests	On-Campus						Public Property		
	2015		2016		2017		2015	2016	2017
	Housing	Total	Housing	Total	Housing	Total			
Weapons Violations	0	0	0	0	0	0	0	0	
Drug Abuse Violations	0	0	0	0	1	0	3	0	2
Liquor Law Violations	1	1	0	1	1	1	0	0	4

Disciplinary Actions	On-Campus						Public Property		
	2015		2016		2017		2015	2016	2017
	Housing	Total	Housing	Total	Housing	Total			
Weapons Violations	0	0	0	0	0	0	0	0	
Drug Abuse Violations	0	0	0	0	0	0	0	2	0
Liquor Law Violations	1	1	0	1	0	0	0	8	0

Unfounded Crimes	2015	2016	2017
Total Unfounded Crimes	0	0	0

Note: SPST: Kansas Campus does not currently control any non-campus property. On August, Saint Paul had an agreement with Avila University approximately 10 miles away for students to reside at Thompson Hall. It should have been reported as non campus for 2015-2016 instead of an ON-campus Student Housing Facility. 20016 the agreement with Avila University expired.