

**NAZARENE
BIBLE
COLLEGE:
ANNUAL
SECURITY
REPORT**



2018-2019

**Campus Safety and Security: NBC Policies,
Emergency Procedures, Drug, Alcohol and
Sexual Abuse Information**

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INTRODUCTION

This publication summarizes the policies and procedures Nazarene Bible College (NBC) uses to deter and respond to crimes on campus as well as emergency response and evacuation procedures. In it you will find listings of the measures NBC has taken to help you in maintaining personal safety. You will also find suggestions on how you can increase your own safety, as well as information required by the Crime Awareness and Campus Security Act of 1990 (Clery Act).

NBC has historically been less susceptible to many of the violent crimes more prevalent in our principal cities and at larger campuses. However, neither NBC, nor any other institution of higher education is a sanctuary from the ills of society. No institution can guarantee that all members of its community will be free from personal attack or loss of their property. This level of absolute protection is unavailable anywhere.

What should be expected is that an institution will take reasonable steps to provide a level of security that is not so restrictive as to be unacceptable, yet will promote an environment in which all members of the college community take personal security very seriously.

Therefore NBC encourages you to read and understand this publication. Your use of the facilities, programs, and services mentioned in this publication, along with your taking steps to increase your safety, will help you have a positive experience at NBC.

SAFETY AND RISK REDUCTION TIPS

PERSONAL SAFETY

- Most assaults occur one-on-one.
- Decrease your chances of assault by walking with someone else.
- Avoid walking in areas with limited lighting.
- Tell others where you are going and when you expect to return.
- Report anyone who is acting suspiciously to:
 - Colorado Springs campus:
 - Support Staff for Academic Affairs: 719-884-5014.
 - Lenexa Office:
 - Compliance Assistant: 719-884-5022

PROPERTY

- Don't leave books or other valuables, such as purses, briefcases, or backpacks, unattended for even short periods of time.

SEXUAL OFFENSES

- Awareness of the possibility that a sexual offense may happen to you is the first step in prevention, be aware of your surroundings at all times.

- Bystander intervention¹ can play an important role in reducing perpetration.
- If you see something suspicious report it immediately to the NBC Support Staff for Academic Affairs (on Campus) 719-884-5014, the Compliance Assistant (in Lenexa) 719-884-5022 or local law enforcement 911.

DRIVING

- Park in well-lit areas whenever possible.
- Lock all doors at all times, even while driving.
- Learn the basics of driving in poor conditions.
- Check weather reports in advance.
- Carry an emergency kit in your car.

FIRE PREVENTION

- Don't abuse fire safety equipment.
- Report all non-functioning equipment to the Support Staff for Academic Affairs (on Campus): 719-884-5014 or the Compliance Assistant (in Lenexa): 719-884-5022.
- Do not overload electrical outlets. If you require a multi-plug device contact the Support Staff for Academic Affairs (on Campus): 719-884-5014, or the Compliance Assistant (in Lenexa): 719-884-5022.

CRIME REPORTING

Nazarene Bible College responds to campus-related incidents and notifies local authorities when necessary. It is imperative that all criminal and emergency incidents are reported to the Support Staff for Academic Affairs or the Title IX Coordinator/Vice President for Finance and the Colorado Springs Police Department when a victim elects to. If a victim is unable to make a report, NBC encourages other members of the community to make the report.

REPORTING PROCEDURES

Nazarene Bible College has established reporting procedures for victims and witnesses of criminal actions or other emergencies. Victims or witnesses that wish to report, for the purposes of informing NBC of an instance that may necessitate a Timely Warning Report or an Emergency Notification, should contact the Support Staff for Academic Affairs immediately. Victims or witnesses that wish to report, for the purposes of reporting crimes on a voluntary and confidential² basis for inclusion in the annual disclosure of crime statistics, should report directly to the Title IX Coordinator/Vice President for Finance.

Contact Information for Reporting

| | |
|---|-----------------------------|
| Support Staff for Academic Affairs - Office: | 719-884-5014 |
| Security Director | - Cell: 719-460-6443 |

¹ See the Department of Education's Definition of "Bystander Intervention" and safe options for bystander intervention later in this document in the section titled SAFE AND POSITIVE OPTIONS FOR BYSTANDERS

² Note: NBC recognizes a confidential report separate from an anonymous report, in that confidential reporting will require some personal information to be disclosed; nevertheless, NBC will make every effort to maintain the information as confidential. Currently NBC does *not* have any procedures for anonymous reporting.

Title IX Coordinator/VP for Finance - Office: 719-884-5021
Emergency 911

Questions, Concerns And Complaints

It is Nazarene Bible College's policy to address any reported non-emergency issues, including criminal offenses, which may be in opposition to a safe working and learning environment. Students with questions, concerns, or complaints regarding any safety issue or form of misconduct may contact the Support Staff for Academic Affairs at 719-884-5014 to either discuss situations or complete a Question, Concern, and Complaints Form. This form is accessible to all students under the Student Center and Resources link through the student online site (<http://online.nbc.edu>). Faculty and staff members with safety or misconduct concerns should contact the payroll specialist at 719-884-5025.

TIMELY WARNING REPORTS

Nazarene Bible College makes timely warning reports to the members of the campus community regarding the occurrence of Title IX crimes. These timely warning reports serve to aid in the prevention of similar crimes while respecting the confidentiality of victims, including names and other personally identifying information of victims. The procedures NBC follows to administer a Timely Warning Report can be found in the EMERGENCY RESPONSE AND EMERGENCY EVACUATION PROCEDURES section of this document.

EMERGENCY NOTIFICATIONS

If the Support Staff for Academic Affairs, the Title IX Coordinator/Vice President for Finance or another member of the President's Cabinet determines that there is an immediate threat to the health or safety of students or employees on campus Nazarene Bible College will follow its emergency notification procedures. These procedures are found in the EMERGENCY RESPONSE AND EMERGENCY EVACUATION PROCEDURES section of this document.

PREPARING AND DISCLOSING ANNUAL CRIME STATISTICS

Nazarene Bible College reports annually to the Department of Education crime statistics that have occurred within the Clery Geography of NBC for the preceding three calendar years. The crime statistics are prepared by the NBC Compliance Assistant and include any Title IX crimes reported to the local police agencies, the NBC Security Director, Support Staff for Academic Affairs, or the Title IX Coordinator/Vice President for Finance. Any and all of the following crimes will be included in the crime statistics

- Murder (and non-negligent manslaughter) †
- Negligent Manslaughter†
- Rape†
- Fondling†
- Incest†
- Statutory Rape†
- Robbery †
- Aggravated Assault†
- Burglary †
- Motor Vehicle Theft †
- Arson†
- Larceny-Theft*
- Simple Assault*
- Intimidation*
- Domestic Violence
- Dating Violence
- Stalking
- Destruction/Damage/Vandalism of Property*
- Arrests and Referrals for Liquor, Drug and Weapon Violations

† Will always be included but may also be determined a hate crime

*Included only if determined a hate crime

CRIME STATISTICS ³

| Crime Category | Crime Reported | Total | | | | |
|---|--|-------|------|------|------------------------------------|---------------------------------|
| | | 2015 | 2016 | 2017 | | |
| Offenses: | <i>Murder (and non-negligent manslaughter)</i> | 0 | 0 | 0 | | |
| | <i>Negligent Manslaughter</i> | 0 | 0 | 0 | 0 Hate Crimes Reported | |
| | <i>Rape</i> | 0 | 0 | 0 | Bias: Actual or Perceived | Total Reported 2014-2016 |
| | <i>Fondling</i> | 0 | 0 | 0 | Race | 0 |
| | <i>Incest</i> | 0 | 0 | 0 | Religion | 0 |
| | <i>Statutory Rape</i> | 0 | 0 | 0 | Gender | 0 |
| | Robbery (and attempted robbery) | 0 | 0 | 0 | Gender Identity | 0 |
| | Aggravated Assault | 0 | 0 | 0 | Disability | 0 |
| | Burglary (and attempted burglary) | 0 | 0 | 0 | Sexual Orientation | 0 |
| | Motor Vehicle Theft | 1 | 0 | 0 | Ethnicity | 0 |
| | Arson | 0 | 1 | 0 | National Origin | 0 |
| Arrests and Referrals for Disciplinary Actions | Arrests for Liquor Law Violations | 0 | 0 | 0 | | |
| | Arrests for Drug Abuse Violations | 0 | 0 | 0 | | |
| | Arrests for Illegal Weapons Possessions | 0 | 0 | 0 | *No off campus locations to report | |
| | Disciplinary Referrals for Liquor Law Violations | 0 | 0 | 0 | *No unfounded crimes | |
| | Disciplinary Referrals for Drug Abuse Violations | 0 | 0 | 0 | | |
| | Disciplinary Referrals for Illegal Weapons Possessions | 0 | 0 | 0 | | |
| VAWA Offenses: | Domestic Violence | 0 | 1 | 0 | | |
| | Dating Violence | | 0 | 0 | | |
| | Stalking | 0 | 0 | 0 | | |
| Hate Crimes | Larceny-theft | 0 | 0 | 0 | | |
| | Simple Assault | 0 | 0 | 0 | | |
| | Intimidation | 0 | 0 | 0 | | |
| | Destruction/Damage/Vandalism of property | 0 | 0 | 0 | | |
| | Offenses ⁴ determined a hate crime | 0 | 0 | 0 | | |

³ Nazarene Bible College is not required to report statistics for crimes reported to pastoral or professional counselors.

⁴ Offenses: murder and non-negligent manslaughter, negligent manslaughter, rape, fondling, incest, statutory rape, robbery, aggravated assault, burglary, motor vehicle theft, arson

NAZARENE BIBLE COLLEGE CLERY GEOGRAPHY:

For the purposes of collecting statistics on the crimes that occur within the boundaries of the Nazarene Bible College it is important to specifically identify the Nazarene Bible College's Clery Geography. According to the Department of Education, Clery Geography is defined as: buildings and property that are a part of the College's campus, any non-campus buildings and property, and public property within or immediately adjacent to and accessible from the campus⁵. A map that displays the Nazarene Bible College Clery Geography is found in Appendix I.

CAMPUS SECURITY AND ACCESS TO FACILITIES

The information below is outlined to meet Nazarene Bible College's obligation to:

1. address campus security's authority and jurisdiction
2. address the working relationship between campus security and local law enforcement authority,
3. address procedures in place to ensure and monitor the security and appropriate access to campus facilities,
4. provide resources for the campus community to obtain information concerning registered sex offenders

CAMPUS SECURITY AND LOCAL LAW ENFORCEMENT

Nazarene Bible College is committed to providing a safe and secure environment for all members of the community, including guests, students, and employees. With this goal in mind, NBC employs a campus Security Director. It is the campus Security Director's jurisdiction to monitor the security of the NBC campus. This includes all owned campus buildings, parking lots and land. Nazarene Bible College does not have non-campus locations or organizations. No personnel on the campus of Nazarene Bible College have arresting authority; however, all individuals are encouraged to report criminal activity promptly to the Support Staff for Academic Affairs. To aid in the prevention of crimes, Nazarene Bible College encourages accurate and prompt reporting of all crimes to the Support Staff for Academic Affairs and the local authorities. Although Nazarene Bible College does not have any written agreements with local law enforcement agencies, NBC appropriately reports crimes and emergencies to local authorities.

ACADEMIC BUILDING ACCESS

The building is open from 5:00 pm-7:00 pm, for student and faculty entry to classes. During regular business hours, the door can be opened via buzzer release. The Security Director, Support Staff for Academic Affairs, or any member of the President's Cabinet can provide access to all campus facilities. Additional information regarding access to campus facilities can be found in the Nazarene Bible College Student Handbook.⁶

⁵ (U.S. Department of Education, Office of Postsecondary Education, 2016)

⁶ nbc.edu/handbook

MAINTENANCE

Security considerations used in the maintenance of campus facilities are as follows: when feasible, repairs and maintenance to facilities will be scheduled at times that do not interfere with the normal operations of the college.

SAFETY LIGHTING

Lighting has been installed throughout the campus to increase evening visibility. Major pathways are well lit and students are encouraged to stay in areas in which visibility is clear.

CAMPUS CRIME LOG

Nazarene Bible College maintains a daily crime log that records crimes which occur on the college campus. The most recent 60 day period of the log is available for public inspection during normal business hours. Individuals who would like to review these logs should contact the NBC Support Staff for Academic Affairs at 719-884-5014.⁷

SEX OFFENDER INFORMATION

Nazarene Bible College is required to inform the campus community where information concerning registered sex offenders can be obtained. The Colorado Springs Police Department keeps a record of registered sex offenders available to the public on their website at cspd.springsgov.com. The State of Kansas has a geographic radius search for sex, violent, drug, etcetera offenders at <http://www.kbi.ks.gov/registeredoffender/GeographicalSearch.aspx>.

NAZARENE BIBLE COLLEGE RESOURCES

Nazarene Bible College is committed to informing each student and employee about the campus security practices and procedures as well as general practices to prevent crime on the campus. NBC encourages students and employees to be responsible for their own security and the security of others. As a measure to ensure the effective communication of these practices and procedures, NBC has organized programs for both staff and students. These trainings offer important information and tips for maintaining a safe campus including crime prevention tips.

dCourse Web Acknowledgement

NBC requires that students annually acknowledge the receipt of information provided in our dCourse Web form. This form includes important information about and the location of NBC's Annual Security Report and Alcohol and Other Drugs Notification. Each student attending NBC, regardless of student type or location, receives this information annually.

NBC Experience – Online

NBC provides a required informative session each term for new online students attending NBC. NBC Experience provides students with exposure to information concerning campus security, NBC's Drug and Alcohol Policy, Title IX, VAWA and the Clery Act. This is a one-time training that online degree and certificate students attend before they begin their first term.

⁷ All publicly available recordkeeping will exclude all personally identifying information about the victim. Publicly available records include NBC's daily crime log, crime statistics, and *Clery Act* reporting and disclosures.

Employee In-services

NBC requires that all staff member attend each of the three annual employee in-services. These in-services cover important information for employees, including campus security procedures and practices.

Employee Training

NBC requires that all employees undergo an online training through SafeColleges. This training focuses primarily on Title IX, The Clery Act and VAWA. This is a mandatory training for employees and is repeated once per year.

Further student and employee programming is described in the section of this document titled PREVENTING CRIMES THROUGH NBC PROGRAMMING.

SEXUAL MISCONDUCT & DATING VIOLENCE, DOMESTIC VIOLENCE, SEXUAL ASSAULT AND STALKING

Nazarene Bible College believes that acts of sexual misconduct are reprehensible. Students and employees have the right to be free from abuse, personal force and violence or threats of violence. All students and employees are expected to conduct themselves in a manner that does not infringe upon the rights of others. NBC is committed to implementing the legislation and conditions provided in the Violence Against Women Act (VAWA) in accordance with the latest regulations provided in the Clery Act, to ensure Title IX compliance. In an effort to implement such legislation NBC is dedicated to providing programming to students and staff in an effort to prevent dating violence, domestic, violence, sexual assault and stalking. The following section outlines important information concerning sexual misconduct. NBC prohibits dating violence, domestic violence, sexual assault, stalking and cyber stalking as defined by the *Clery Act*.

IMPORTANT DEFINITIONS

The following definitions are defined under Nazarene Bible College's local jurisdictions, the states of Colorado and Kansas

Consent:⁸

Consent means cooperation in act or attitude pursuant to an exercise of free will and with knowledge of the nature of the act. A current or previous relationship is not sufficient to constitute consent. Submission under the influence of fear does not constitute consent.

Dating Violence:⁹

Dating violence is violence committed by a person

- Who is or has been in a social relationship of a romantic or intimate nature with the victim; and
- Where the existence of such a relationship shall be determined based on a consideration of the following factors:
 - The reporting party's statement,
 - The length of the relationship,
 - The type of relationship,
 - The frequency of interaction between the persons involved in the relationship.

Domestic Violence:

Domestic Violence, in Colorado, means

- An act or threatened act of violence upon a person with whom the actor is or has been involved in an intimate relationship. Domestic violence also includes any other crime against a person, or against property, including an animal or any municipal ordinance violation against a person, or against property, including an animal, when used as a method of coercion, control, punishment, intimidation or revenge directed against a person with whom the actor is or has been involved in an intimate relationship.
- Intimate relationship means a relationship between spouses, former spouses, past or present unmarried couples, or persons who are both the parents of the same child regardless of whether the persons have been married or have lived together at any time.

Domestic Violence, in Kansas, means

- An act or threatened act of violence against a person with whom the offender is involved or has been involved in a dating relationship, or an act or threatened act of violence against a family or household member by a family or household member. Domestic violence also includes any other crime committed against a person or against property, or any municipal ordinance violation against a person or against property, when directed against a person with whom the offender is involved or has been involved in a dating relationship or when directed against a family or household member by a family or household member.

⁸ Please note, Kansas law does not define the term "consent," the definition used in this document is that of Colorado

⁹ Please note, neither Colorado nor Kansas laws define the term "dating violence" the definition used in this document is found in the Handbook for Campus Safety and Security Reporting 2016.

- “Dating relationship” means a social relationship of a romantic nature. In addition to any other factors the court deems relevant, the trier of fact may consider the following when making a determination of whether a relationship exists or existed: Nature of the relationship, length of time the relationship existed, frequency of interaction between the parties and time since termination of the relationship, if applicable.
- “Family or household member” means person 18 years of age or older who are spouses, former spouses, parents or stepparents and children or stepchildren, and persons who are presently residing together or have resided together in the past, and persons who have a child in common regardless of whether they have been married or have lived together at any time. Family or household member also includes a man and woman if the woman is pregnant and the man is alleged to be the father, regardless of whether they have been married or have lived together at any time.

Sexual Assault:

In Colorado, any actor who knowingly inflicts sexual intrusion or sexual penetration on a victim commits sexual assault if:

- The actor causes submission of the victim by means of sufficient consequence reasonably calculated to cause submission against the victim's will; or
- The actor knows that the victim is incapable of appraising the nature of the victim's conduct; or
- The actor knows that the victim submits erroneously, believing the actor to be the victim's spouse; or
- At the time of the commission of the act, the victim is less than fifteen years of age and the actor is at least four years older than the victim and is not the spouse of the victim; or
- The victim is in custody of law or detained in a hospital or other institution and the actor has supervisory or disciplinary authority over the victim and uses this position of authority to coerce the victim to submit, unless the act is incident to a lawful search; or
- The actor, while purporting to offer a medical service, engages in treatment or examination of a victim for other than a bona fide medical purpose or in a manner substantially inconsistent with reasonable medical practices; or
- The victim is physically helpless and the actor knows the victim is physically helpless and the victim has not consented.

In Kansas, sexual assault is defined as:

- Knowingly engaging in sexual intercourse with another person who does not consent when:
 - ❖ The victim is overcome by force or fear
 - ❖ The victim is unconscious or physically powerless; or
- Knowingly engaging in sexual intercourse with another person when that person is incapable of giving consent because of mental deficiency or disease, or when the victim is incapable of giving consent because of the effect of any alcoholic liquor, narcotic, drug or other substance, reasonably apparent to the offender; or
- Engaging in sexual intercourse with a child under 14 years of age; or

- Engaging in sexual intercourse with a victim when the victim’s consent was obtained through a knowing misrepresentation made by the offender that the sexual intercourse was a medically or therapeutically necessary procedure; or
- Engaging in sexual intercourse with a victim when the victim’s consent was obtained through a knowing misrepresentation made by the offender that the sexual intercourse was a legally require procedure within the scope of the offender’s authority.

Sexual Misconduct:¹⁰

Any nonconsensual sexual physical contact, including instances in which the person subjected to the misconduct is incapable of giving consent because of permanent or temporary mental or physical incapacity.

Stalking:

In Colorado, a person commits stalking if directly, or indirectly through another person, the person knowingly:

- Makes a credible threat to another person and, in connection with the threat, repeatedly follows, approaches, contacts or places under surveillance that person, a member person's immediate family , or someone with whom that person has or has had a continuing relationship; or
- Makes a credible threat to another person and, in connection with the threat, repeatedly makes any form of communication with that person, a member of that person's immediate family, or someone with whom that person has or has had a continuing relationship, regardless of whether a conversation ensues; or
- Repeatedly follows, approaches, contacts, places under surveillance, or makes any form of communication with another person, a member of that person's immediate family, or someone with whom that person has or has had a continuing relationship in a manner that would cause a reasonable person to suffer serious emotional distress and does cause that person, a member of that person's immediate family, or someone with whom that person has or has had a continuing relationship to suffer serious emotional distress.

In Kansas, stalking is defined as:

- Recklessly engaging in a course of conduct targeted at a specific person which would cause a reasonable person in the circumstances of the targeted person to fear for such person’s safety, or the safety of a member of such person’s immediate family and the targeted person is actually placed in such fear;
- Engaging in a course of conduct targeted at a specific person with knowledge that the course of conduct will place the targeted person in fear for such person’s safety or the safety of a member of such person’s immediate family; or
- After being served with, or otherwise provided notice of, any protective order included in K.S.A 21-3843, prior to its repeal or K.S.A. 2012 Supp. 21-5924, and amendments thereto, that prohibits contact with a targeted person, recklessly engaging in at least one act listed in subsection (f)(1) that violates the provisions of

¹⁰ Please note, Kansas law does not define the term “Sexual Misconduct,” the definition used in this document is that of Colorado

the order and would cause a reasonable person to fear for such person's safety, or the safety of a member of such person's immediate family and the targeted person is actually placed in such fear.

NBC also recognizes cyberstalking as a form of stalking. Cyberstalking is the use of technology, specifically the internet, to stalk someone.

Further definitions are located in the NBC Sexual Misconduct Prevention: Policies and Procedures document which can be found at nbc.edu/security.

WHAT TO DO IF A SEXUAL OFFENSE OCCURS

1. Respond to any injuries first. If you need medical attention, call an ambulance at 911.
2. The preservation of evidence is crucial. Do not alter your physical appearance until after a physical examination has been conducted. Do not shower, wash your clothes, or comb your hair. Avoid drinking and eating.¹¹
3. Call the Colorado Springs Police Department at 719-444-7000 (in Lenexa, call 913-477-7300). A police officer will meet with you as soon as possible. If you would like, NBC's Support Staff for Academic Affairs (Title IX Coordinator or Compliance Assistant, in Lenexa) can assist you in contacting the appropriate police department. **Note: everyone has a right to decline to notify local law enforcement.**¹²
4. Call the NBC Title IX Coordinator/Vice President for Finance at 719-884-5021 if they are not available contact the NBC Security Director at 719-460-6443 or the Support Staff for Academic Affairs at 719-884-5014.
5. Go with the police officer to the nearest hospital for evidence collection and a medical examination.
6. NBC is required to perform an investigation once a report of sexual offense has occurred. Therefore, if you have not already done so, contact the Title IX Coordinator/Vice President for Finance at 719-884-5021, if they are not available contact the Support Staff for Academic Affairs at 719-884-5014.

NBC'S COMMITMENT TO PROTECTING CONFIDENTIALITY

If a crime of sexual misconduct has occurred, including dating violence, domestic violence, sexual assault (rape, fondling, incest or statutory rape), sexual harassment, stalking or cyberstalking, the College encourages accurate and prompt reporting of these crimes to the Security Director, the Title IX Coordinator/Vice President for Finance and/or state and local police agencies. Nazarene Bible College understands that it can be difficult for a victim to come forward after such an event; this section describes NBC's commitment to protecting the

¹¹ The preservation of evidence is critical. Preserving evidence may assist a victim in proving that the alleged sexual offense occurred or in obtaining protective measures such as a protective order. (The Handbook for Campus Safety and Security Reporting, 2016 Edition, 2016, p. 8.9)

¹² Every victim has the right to: notify local law enforcement authorities, be assisted by campus authorities in notifying local law enforcement, or decline to notify such authorities.

confidentiality of victims. Complete confidentiality can only be maintained by: licensed counsellors; or NBC’s designated online chaplain. Confiding in other employees will necessitate some reporting; however, NBC ensures that the publically available recordkeeping and disclosures do not include any personally identifying¹³ information. Unless confidentiality prevents the institution from providing accommodations or protective measures, it will keep such measures confidential. Although rare, there are times when the College may not be able to maintain confidentiality in order to provide a safe, non-discriminatory environment for all students.

NBC’S RESPONSIBILITIES

The College takes the strongest possible stance against sexual misconduct in all its forms. The College is actively engaged in educating its members about these vital issues and providing timely support and assistance to victims of sexual assault. If a crime of sexual misconduct has occurred on or off campus, the Nazarene Bible College will provide the victim, whether student or employee, with a written explanation of the victim’s rights and options as well as the resources available to them through both the institution and the community.

Available Resources

The Nazarene Bible College will provide the victim, in writing, information concerning additional security and support which could include: issuing a no-contact order, helping arrange a change of working arrangements or academic schedules (including for the accused pending the outcome of an investigation) or adjustments for assignments or tests. NBC will also provide victims written notification about other available resources such as: victim advocacy, academic support, counseling, disability, health or mental health services, and legal assistance both on and off campus. NBC will make accommodations requested by the victim regardless of whether the victim chooses to report the crime to campus authorities or local law enforcement.

A VICTIM’S RIGHTS AND OPTIONS

1. The Right to Human Dignity

Victims shall:

- Be treated with fairness and respect for their dignity,
- Be free from any suggestions that they must report sexual assaults to be assured recognition of any other identified principles or rights,
- Be free from any suggestion that they are responsible for the sexual assaults committed against them,
- Be free from any threat of retaliation or other attempt to prevent the reporting of sexual misconduct,

¹³ According to the Department of Education, “Personally Identifying Information” is defined in the Violence Against Women Act as “individually identifying information for or about an individual, including information likely to disclose the location of a victim of domestic violence, dating violence, sexual assault or stalking, regardless of whether the information is encoded, encrypted, hashed or otherwise protected, including a first and last name; a home or other physical address, contact information (including a postal, e-mail or Internet protocol address, or telephone or facsimile number), a social security numbers, driver’s license number, passport number or student identification number, any other information, including date of birth, racial or ethnic background or ethnic background, or religious affiliation that would serve to identify any individual.” (The Handbook for Campus Safety and Security Reporting, 2016 Edition, 2016, p. 8.12)

- Be free from unwanted pressure from campus personnel to:
 - Report sexual assaults if they do not wish to do so,
 - Report sexual assaults as less serious offenses,
 - Refrain from reporting sexual assaults for any reason, including the fear of unwanted personal publicity
- Have their allegations of sexual assault treated seriously,
- Have their privacy honored.

2. The Right to Resources On and Off Campus

Victims shall:

- Receive the options to pursue a criminal complaint with the appropriate law enforcement agency, to pursue the College's disciplinary process, or to pursue both processes simultaneously,
- Be notified of existing campus and community-based medical, counseling, mental health and student services for victims of sexual assault whether or not the assault is formally reported to campus or civil authorities,
- Be informed of and assisted in exercising:
 - Any rights to confidential or anonymous testing for sexually transmitted infections, HIV, and pregnancy,
 - Any rights that may be provided by law to obtain the communicable diseases test results of sexual assault suspects,
- Be informed of the possible availability of crime victim assistance compensation through the **Colorado State Crime Victims' Rights**, http://crime.about.com/od/victims/qt/victims_co.htm
- Have access to campus counseling.

3. The Right to Law Enforcement and Campus Intervention

Victims shall:

- Have the right to notify appropriate law enforcement, including campus authorities,
- Have the right, if they so choose, to assistance from the campus authorities in notifying local law enforcement,
- Have the right to decline to notify such authorities,
- Reports of sexual assault will be investigated and evaluated by the appropriate criminal and civil authorities of the jurisdiction in which the sexual assault is reported,
- Victims shall receive full and prompt cooperation and assistance of campus personnel in notifying the proper authorities,
- Victims shall receive full, prompt, and victim-sensitive cooperation of campus personnel with regard to obtaining, securing and maintaining evidence, including a medical examination when it is necessary to preserve evidence of the assault,
- "No contact" orders (e.g., Cease and Desist orders) shall be issued promptly and in writing to all parties to a reported sexual assault after the College receives notice of a complaint, - orders of protection, restraining orders - <http://knowyourix.org/dealing-with/dealing-with-university-issued-no-contact-orders/>

- Campus personnel shall take reasonable and necessary actions to prevent further unwanted contact by victim’s alleged assailants,
- Victims shall be notified of the options for and provided assistance in changing academic accommodations if such changes are reasonably available.

4. The Right to Campus Judicial Proceedings

Victims have the right to:

- Written and advance notice about a disciplinary hearing involving the person or persons accused of sexually assaulting them,
- Have the opportunity to present witnesses and other evidence, and to receive notice of the process, information about procedures, and written notice of the outcome in a manner that is equivalent to the process of the accused,
- Have a person (advocate) of their choice accompany them throughout the disciplinary hearing,
- Remain present during the entire proceeding, whenever possible, alternative arrangements may be made for those who do not want to be present in the same room as the accused during the disciplinary hearing,
- Be heard at the proceeding,
- Be assured that their irrelevant past sexual history will not be discussed during the hearing,
- Make a “victim impact statement” if the accused is found in violation of the code,
- Be informed in a timely fashion (60 business days) of the outcome of the hearing,
- Have the right to appeal the outcome of the hearing.

SEXUAL MISCONDUCT DISCIPLINARY PROCEDURES

When the accused offender is an NBC student, the victim may wish to pursue College disciplinary procedures. When an individual believes that a crime has been committed, it is recommended that charges be filed with the local criminal justice system. Disciplinary action may be called for in cases of alleged sexual misconduct specifically for cases of dating violence, domestic violence, sexual harassment, sexual assault and stalking. Although there is no time limit on the filing of charges within the College, prompt reporting is likely to result in a more satisfactory investigation because people’s memories are fresh and witnesses are more readily available. Upon written request, Nazarene Bible College will disclose to the alleged victim¹⁴ of a crime of violence¹⁵ or a non-forcible sex offense the report of the final outcome of the disciplinary proceeding.

In the case of a sexual misconduct disciplinary process, Nazarene Bible College ensures a prompt, fair and impartial proceeding from the initial investigation to the final result. Nazarene Bible College’s disciplinary proceedings for cases of alleged sexual misconduct are directed by

¹⁴ If the alleged victim is deceased as the result of the crime in question, NBC will treat the next of kin as the alleged victim for the purposes of the disciplinary process.

¹⁵ As defined by 18 U.S. Code 16 a crime of violence is an “offense that as an element the use, attempted use, or threatened use of physical force against the person or property of another, or any offense that is a felony and that, by nature, involves a substantial risk that physical force against the person or property of another may be used in the course of committing the offense.”

the Title IX Coordinator. Investigations, if necessary, are conducted by the Student Care and Conduct Committee or the Employee Care & Benefit Committee overseen by the chair of that committee. Appeals are handled by NBC's President's Cabinet. The members of the Student Care and Conduct Committee, Employee Care & Benefit Committee and the President's Cabinet receive annual training regarding:

- How to conduct investigations and hearings that protect the safety of victims and provide accountability,
- Relevant information concerning dating violence, domestic violence, sexual harassment, sexual assault and stalking.

NBC's standard of evidence for all cases of sexual misconduct is clear and convincing evidence.¹⁶

When the institution receives a complaint of sexual misconduct, the type of disciplinary proceeding is determined by the nature of the complaint and the status of the individual(s) involved (i.e. students, employees).

- *Student Disciplinary Complaints:* if the complaint is brought against a student, the complaint will be reviewed based on applicable federal and state regulation and the college's standards of conduct set forth in the Student Handbook. Investigations, if necessary, are handled by the college's Student Care and Conduct Committee.
- *Employee Disciplinary Complaints:* if the complaint is brought against an employee, the complaint will be reviewed by the Office of Payroll & HR in accordance with the procedures set forth in this document. Investigations, if necessary, are handled by the college's Employee Care & Benefit Committee.

Disciplinary Process for Students

1. NBC receives the complaint:
 - Through the Question, Concern or Complaint Form available electronically through dCourseWeb or through the Office of Student Success – the Academic Dean directs the complaint within two business days to the appropriate office (i.e. Office of Student Success, Office of Payroll & HR) and the Title IX Coordinator.
 - Verbally or in writing to a responsible employee who reports the complaint to the Title IX Coordinator within three business days.
 - Directly to the Title IX Coordinator.
2. The complainant will meet with the appropriate office within ten business days of the initial complaint to determine the scope of the issue and to be advised of all options.
 - At this stage in the proceedings, NBC will provide the alleged victim¹⁷ with a written explanation of victim rights, options, resources and protective measures as described in the Annual Security Report (ASR) under NBC'S RESPONSIBILITES.
3. NBC will require the accused to meet with the same office within five business days of the meeting with the complainant to discuss the issue and the steps of the process.
 - Failure to participate in this meeting will result in progression to the next step.

¹⁶ According to changes made by President Trump to the 2011 Dear Colleague Letter, "preponderance of evidence" is no longer required, "clear and convincing evidence" is sufficient.

¹⁷ If the alleged victim is deceased as the result of the crime in question, NBC will treat the next of kin as the alleged victim for the purposes of the disciplinary process.

4. The appropriate office, in conjunction with the Title IX Coordinator, will determine and notify all parties simultaneously in writing within five business days after both of the initial meetings have been conducted (complainant and accused), if the Student Care and Conduct Committee will investigate further.
5. Should the evaluation of the Title IX Coordinator conclude that no further investigation is required, the situation will be documented and paperwork will be filed with the compliance office. The parties will be informed simultaneously in writing of this conclusion within five business days after both of the initial meetings have been conducted.
6. Should the evaluation of the Title IX Coordinator conclude that further investigation is necessary, the Student Care and Conduct Committee will conduct the investigation through appropriate meetings with the complainant and the accused.¹⁸ This portion of the investigation will be completed within fifteen business days to ensure that the entire investigation from beginning to end lasts no longer than sixty days.
 - Any person on the Student Care and Conduct Committee who volunteers or is determined by the committee to have bias or a conflict of interest will be removed from the committee for the duration of the investigation and disciplinary process.¹⁹
 - Written petitions to request a member of the committee be removed based on bias or conflict of interest may be submitted to the committee by the complainant or the accused. The committee will notify both parties simultaneously in writing of the result of the removal request within seven business days.
7. After carefully hearing all of the facts pertinent to the situation, the Care and Conduct Committee will take one or more of the following actions:
 - No action, verbal reprimand, written reprimand, restitution or fine, professional counselling, appointments with other professionals, continued accountability to a mentor, probation from the college, and permanent dismissal from the college or any positions within the college.
 - Professional counselling, appointments with other professionals, continued accountability to a mentor, probation from the college may be obligatory for seven days, thirty days, a session, a term, the remainder of the school year, an entire school year, or the duration of attendance at NBC
 - Reinstatement will occur when the Student Care and Conduct Committee has reviewed the circumstances and agrees that the sanctions imposed by the institution have been met and the individual has progressed to the place where reinstatement can occur.
 - If the Student Care and Conduct Committee's review indicates further action is necessary, NBC reserves the right to impose further reparative measures consisting of the types and lengths outlined above.
 - In addition to disciplinary sanctions imposed on the offender, NBC will take all necessary actions to eradicate the hostile environment and prevent its recurrence.²⁰

¹⁸ NBC guarantees to all parties the same opportunities regarding the presence of an advisor of their choosing during disciplinary proceedings. The committee will inform all parties simultaneously in writing prior to the disciplinary meetings whether an advisor will be allowed.

¹⁹ Please see Nazarene Bible College's Conflict of Interest Policy in Appendix II.

²⁰ (Sexual Misconduct Response & Prevention, p. 1)

8. All parties will be notified simultaneously of the final outcome in writing within five business days of the conclusion of the investigation.
 - At this time all parties will be notified simultaneously in writing of NBC's procedures for an appeal.
9. Documentation of each meeting, all pertinent materials and the results will be compiled by the elected member of the committee and retained for a minimum of three years by the compliance office.²¹
10. Any party, who feels that he or she has been treated unfairly or inappropriately, should complete and file a Student Appeals Form in writing with the Title IX Coordinator. All parties will be notified in writing of the appeal within three business days of the receipt of the written appeal.
11. The Title IX Coordinator will determine a course of action regarding the issue, the parties will be informed simultaneously in writing of the course of action to be taken within seven business days. Such action may include, but is not limited to:
 - Private meeting with the Title IX Coordinator, the Director of Student Success, or any persons involved in the investigative process whom the student believes has treated him/her unfairly. (This does not include meeting with the accused/accuser).
 - Meeting before the Student Care and Conduct Committee.
 - Meeting with the President's Cabinet.
12. The student may continue to appeal up to the President's Cabinet. The President's Cabinet is the highest level of appeal. The President's Cabinet will ensure that all previous processes have occurred before meeting on a concern/complaint.
13. All parties will be notified simultaneously of the final outcome in writing within five business days of the conclusion of the appeal.

Disciplinary Process for Employees

1. NBC receives the complaint through contact with the payroll specialist or directly to the Title IX Coordinator.
2. The complainant will meet with the appropriate office within ten calendar days of the initial complaint to determine the scope of the issue and to be advised of all options.
 - At this stage in the proceedings, NBC will provide the alleged victim²² with a written explanation of victim rights, options, resources and protective measures as described in the Annual Security Report (ASR) under NBC'S RESPONSIBILITES.
3. NBC will require the accused to meet with the same office within seven business days of the meeting with the complainant to discuss the issue and the steps of the process.
 - Failure to participate in this meeting will result in progression to the next step.
4. The appropriate office, in conjunction with the Title IX Coordinator, will determine and notify all parties simultaneously in writing within seven business days after both of the initial meetings have been conducted (complainant and accused) if the Employee Care & Benefit Committee will investigate further.
5. Should the evaluation of the Title IX Coordinator conclude that no further investigation is required, the situation will be documented and paperwork will be filed with the

²¹ The Title IX Coordinator will utilize these records to identify patterns, confirm adherence to policy and procedure, and ensure non-discriminatory practices.

²² If the alleged victim is deceased as the result of the crime in question, NBC will treat the next of kin as the alleged victim for the purposes of the disciplinary process.

compliance office. The parties will be informed, in writing, of this conclusion within seven business days after both of the initial meetings have been conducted.

6. Should the evaluation of the Title IX Coordinator conclude that further investigation is necessary the Employee Care & Benefit Committee will conduct the investigation through appropriate meetings with the complainant and the accused.²³ This portion of the investigation will be completed within fifteen business days to ensure that the entire investigation from beginning to end lasts no longer than sixty days.
 - Any person on the Employee Care & Benefit Committee who volunteers or is determined by the committee to have bias or a conflict of interest will be removed from the committee for the duration of the investigation and disciplinary process.²⁴
 - Written petitions to request a member of the committee be removed based on bias or conflict of interest may be submitted to the committee by the complainant or the accused. The committee will notify both parties simultaneously in writing of the result of the removal request within seven business days.
7. After carefully hearing all of the facts pertinent to the situation, the Employee Care & Benefit Committee will take one or more of the following actions:
 - No action, verbal reprimand, written reprimand, restitution or fine, professional counselling, appointments with other professionals, continued accountability to a mentor, probation from the college, and permanent dismissal from the college or any positions within the college
 - Professional counselling, appointments with other professionals, continued accountability to a mentor, probation from the college may be obligatory for one month, three months, or six months.
 - Reinstatement will occur when the Employee Care & Benefit Committee has reviewed the circumstances and agrees that the sanctions imposed by the institution have been met and the individual has progressed to the place where reinstatement can occur.
 - If the Employee Care & Benefit Committee's review indicates further action is necessary, NBC reserves the right to impose further reparative measures consisting of the types and lengths outlined above.
 - In addition to disciplinary sanctions imposed on the offender, NBC will take all necessary actions to eradicate the hostile environment and prevent its recurrence.²⁵
8. All parties will be notified simultaneously of the final outcome in writing within five business days of the conclusion of the investigation.
 - At this time all parties will be notified simultaneously in writing of NBC's procedures for an appeal.
9. Documentation of each meeting, all pertinent materials and the results will be compiled by the elected member of the Employee Care & Benefit Committee and retained for a minimum of three years by the compliance office.²⁶

²³ NBC guarantees both all parties with the same opportunities regarding the presence of an advisor of their choosing during disciplinary proceedings. The committee will inform all parties simultaneously in writing prior to the disciplinary meetings whether an advisor will be allowed.

²⁴ Please see Nazarene Bible College's Conflict of Interest Policy located in Appendix I.

²⁵ (Sexual Misconduct Response & Prevention, p. 1)

²⁶ The Title IX coordinator will utilize these records to identify patterns, confirm adherence to policy and procedure, and ensure non-discriminatory practices.

10. Any party, who feels that he or she has been treated unfairly or inappropriately, should file a complaint in writing with the Title IX Coordinator. All parties will be notified simultaneously in writing of the appeal within three business days of the receipt of the written appeal.
11. The Title IX Coordinator will determine a course of action regarding the issue, the parties will be informed in writing of the course of action to be taken within seven business days. Such action may include, but is not limited to:
 - Private meeting with the Title IX Coordinator, or any persons involved in the investigative process whom the employee believes has treated him/her unfairly. (This does not include meeting with the accused/accuser).
 - Meeting before the Employee Care & Benefit Committee.
 - Meeting with the President's Cabinet.
12. The individual may continue to appeal up to the President's Cabinet. The President's Cabinet is the highest level of appeal. The President's Cabinet will ensure that all previous processes have occurred before meeting on a concern/complaint.
13. All parties will be notified simultaneously of the final outcome in writing within five business days of the conclusion of the appeal.

Although Nazarene Bible College will make every effort to adhere to the timelines listed above, occasionally there may be instances where delays are inevitable. Should this happen a written notice detailing the delay and reason for the occurrence will be provided to all parties simultaneously.

PREVENTING CRIMES THROUGH NBC PROGRAMS

Nazarene Bible College has created the Risk Management Committee in an effort to develop and implement programming. The Risk Management Committee meets once per term or as needed coordinated primarily by the Committee Chair, the Compliance Assistant. The programming developed and implemented through the Committee aims to:

- Prevent dating violence, domestic violence, sexual assault and stalking crimes and to provide awareness to both students and employees
- Educate students and employees about drug and alcohol abuse
- Inform student and employees about NBC campus security procedures and the prevention of crime

The Risk Management Committee's programming takes three different forms: Risk Reduction (primary prevention), Awareness Programs, or Bystander Intervention. Each of these forms of programming are implemented through the distribution of informative pamphlets, handouts, copies of NBC policies or verbal presentations.

The Risk Management Committee's proposed programming activities for the 2018-2019 school year include:

- January 2019: NBC Campus Safety Awareness – Campus Employees Only
 - Awareness Programming
 - Risk Reduction Programming
- April 2019: National Sexual Assault Awareness Month

- Awareness Programming
- Bystander Intervention Programming
- June 2019: NBC’s Substance Abuse Prevention Awareness Month
 - Awareness Programming
 - Nazarene Bible College Policy Programming

In addition to this programming, Nazarene Bible College offers training for both staff and students covering legislation and recommendations regarding Title IX, The Clery Act, and VAWA. These trainings are described as:

STUDENT TRAINING

NBC has online training on the student portal available to new and existing students.

EMPLOYEE TRAINING

NBC requires that all employees undergo an online training through SafeColleges. This is a mandatory training for employees and is repeated once per year. Training also occurs during staff in-services.

Incoming students and employees are introduced to the trainings listed above as well as the crime prevention, awareness, and risk reduction programs that occur during their time at NBC.

SAFE AND POSITIVE OPTIONS FOR BYSTANDERS

The college expects all members of the campus community to take reasonable and prudent actions to prevent or stop an act of sexual misconduct. The Department of Education defines bystander intervention as: “safe and positive options that may be carried out by an individual or individuals to prevent harm or intervene when there is a risk of dating violence, domestic violence, sexual assault or stalking.” (The Handbook for Campus Safety and Security Reporting, 2016 Edition, 2016, p. 87) Bystanders can help in several different ways, including direct intervention, seeking assistance from an authority figure, notifying the Title IX Coordinator, notifying the Director of Security, or calling state or local law enforcement.

If a victim confides in you: It is important to let the victim tell their story. Listen respectfully, and help them explain and identify what has happened to them. Do not contradict them or play “devil’s advocate” even if parts of the story don’t immediately make sense or even if you would have made other choices when presented with the same scenario or challenges. Help the victim identify others in their network in whom they can confide. Ask the victim what they need to feel safe, encourage them to seek medical attention and counseling, and encourage them to report the act if they feel comfortable doing so. The first people that a victim talks to can have a significant impact on the person and their ability to report and get through an ordeal. Be a supportive, kind, understanding and nonjudgmental person and you can be a positive force for this victim in seeking the help they require to move forward.²⁷

²⁷ (Office of General Counsel: State University of New York, 2015)

DRUGS AND ALCOHOL

POLICY ON ILLEGAL USE OF DRUGS AND ALCOHOL (STUDENT)

It is the policy of Nazarene Bible College to prohibit the possession, use, manufacture or distribution of tobacco, alcohol, illegal drugs or other controlled substances, as defined by federal law, on the campus or as part of any college activity.

Any violation of this statement will be dealt with by the Office of the Vice President for Enrollment Management and will be subject to disciplinary action, up to and including suspension from the college. Evidence of successful completion of a rehabilitation program will be a requirement for reinstatement.

If local, state, or federal laws have been broken on campus or during college activities, the college will also notify appropriate law enforcement agencies. Illegal possession or use of drugs or alcohol may result in criminal prosecution.

Nazarene Bible College, by federal law, is required to notify the source of financial aid at the time the violation is reported. A conviction of the violation of this law must be reported within ten days of the conviction.

ALCOHOL AND OTHER DRUGS NOTIFICATION

In compliance with the requirements of the Drug Free Workplace Act of 1988 and the Drug-Free Schools and Communities Act Amendment of 1989, Nazarene Bible College is required to provide this notification annually to all students and employees. NBC's complete Drug and Alcohol Policy can be found at nbc.edu/security.

It is the policy of Nazarene Bible College to prohibit the possession, use, manufacture or distribution of tobacco, alcohol, cannabis, illegal drugs or other controlled substances, as defined by federal law, on the campus or as part of any college activity.

As an educational institution, NBC aims to educate its community members about prevention and the risks of unlawful use of illicit drugs and alcohol, and to encourage appropriate, responsible behavior. As an agent of the Church of the Nazarene, NBC holds to the church's position that total abstinence is the first step in prevention of tobacco, drug, and alcohol abuse. The health risks associated with the abuse of alcohol and the use of illicit drugs are numerous. They include malnutrition, brain damage, heart disease, pancreatitis, cirrhosis of the liver, emotional illness, coma and death. Personal relationships and the ability to work and study are also at risk. Use during pregnancy endangers the fetus.

Disciplinary sanctions for the violation of the policy by any employee may include, but are not limited to, reprimand, reassignment, demotion, suspension, dismissal, or termination of employment.

Disciplinary sanctions for students may include, but are not limited to, disciplinary warning, probation, suspension, or expulsion. A disciplinary sanction for either employees or students may include the completion of an appropriate rehabilitation program. Information concerning available counseling, treatment, rehabilitation or re-entry programs can be provided by the Office of the Vice President for Enrollment Management (students) or by the Office of Payroll and HR (employees.) These resources may include, but are not limited to:

- Counselling through NBC,
- Counselling through the community of Colorado Springs (or Lenexa) and,
- Rehabilitation centers such as Alcoholics Anonymous.

Referral to the authorities for prosecution under criminal law may also be invoked, especially in cases of unlawful sale or distribution of drugs or alcoholic beverages. Penalties under local, state, and federal law may range in severity from relatively minor fines to fines of several million dollars. Imprisonment is also a possibility for terms ranging from six months to life sentence.

Any employee, whether faculty, administrator or support staff, who is convicted under a criminal drug statute for a violation occurring in the workplace must notify the College's Legal Counsel within five (5) days from the date of conviction.

In the case of students that receive federal financial aid, Nazarene Bible College is required by federal law to notify the source of financial aid at the time a student violation is reported. A conviction of the violation of this law must be reported with ten days of the conviction.

The NBC Committee on Campus Security meets biennially to review the student and employee Alcohol and Other Drugs (AOD) programming including the AOD Notification and disciplinary sanctions.

DRUG AND ALCOHOL PROGRAMMING

As previously stated in the PREVENTING CRIMES THROUGH PROGRAMMING section of this document, Nazarene Bible College has created the Risk Management Committee in an effort to develop and implement programming. The Risk Management Committee meets once per term or as needed coordinated primarily by the Committee Chair, the Compliance Assistant. Specific NBC programming concerning drug and alcohol abuse is as follows:

- June 2019: NBC's Substance Abuse Prevention Awareness Month
 - Awareness Programming
 - Nazarene Bible College Policy Programming

The goal of this programming is to educate students and employees about drug and alcohol abuse and NBC's drug and alcohol policies. This programming will apply to both employees and students and will take one or multiple of the following forms: distribution of informative pamphlets, handouts, copies of NBC policies or verbal presentations.

DRUG AND ALCOHOL TREATMENT RESOURCES

Drug and alcohol counseling is available to students from the following agencies, in the Colorado Springs area (for information about Lenexa area agencies, see the office of Payroll and HR):

| | |
|--|--------------|
| Pikes Peak Mental Health Center Alcohol | |
| Emergency (24 hour) | 719-635-7000 |
| General Information | 719-572-6100 |
| Alcoholics Anonymous (24 hours) | 719-573-5020 |
| Narcotics Anonymous | 719-444-3415 |
| Al-Anon | 719-637-1580 |
| Penrose/St. Francis Alcohol & Drug Treatment Programs | |
| Adult Program | 719-776-8741 |

| | |
|----------------------------------|--------------|
| Referral Center | 719-776-8325 |
| Cedar Springs Hospital | 719-633-4114 |
| Cocaine Anonymous Hotline | 719-448-0110 |

EMERGENCY RESPONSE AND EVACUATION PROCEDURES

Nazarene Bible College regards the safety of all members of the campus community with the utmost importance. In recognizing this, Nazarene Bible College has developed emergency response and evacuation procedures for campus facilities.

In regards to the Lenexa offices, the Global Ministry Center has developed emergency procedures which have been implemented by Nazarene Bible College.

DEFINITION OF EMERGENCY NOTIFICATIONS AND TIMELY WARNING REPORTS

Emergency Notifications shall be issued immediately when a significant emergency or dangerous situation involving an immediate threat to the health or safety of students or employees is confirmed on the campus. Emergency notifications will be issued without delay unless doing so would compromise efforts to assist a victim or contain, respond to, or otherwise mitigate the emergency.

Timely Warnings shall be issued whenever a Clery Crime that is considered to represent a serious or continuing threat to students, employees, or property is reported to designated NBC personnel or local police and has occurred within the College’s Clery Geography (see Appendix I). These warning reports will include any and all information determined helpful in promoting safety and prevention of similar crimes.

DECLARING A CRISIS ON CAMPUS

Campus emergencies may only be declared by the following persons:

› ***Civil Authorities:***

The police, fire officials, or other local, state, or federal government agencies may declare an emergency which would involve the campus.

› ***Appropriate NBC Official:***

The President, or if not available, the Title IX Coordinator/Vice President for Finance, the Vice President for Academic Affairs, the Vice President for Enrollment Management, the Chief Information Officer or the Security Director may declare an emergency

EMERGENCY CAMPUS PHONE NUMBERS

| | | |
|-------------------------------------|--------|--------------|
| Director of Financial Aid | Office | 719-884-5051 |
| Director of Facilities & Grounds | Cell | 719-460-6443 |
| President | | 719-884-5001 |
| Title IX Coordinator/VP for Finance | | 719-884-5021 |
| VP For Academic Affairs | | 719-884-5011 |

| | |
|-------------------------------------|--------------|
| VP for Enrollment Management | 719-884-5061 |
| Chief Information Officer | 719-884-5101 |
| Colorado Springs Police (Emergency) | 911 |
| (Non-emergency) | 719-444-7000 |
| Lenexa Police (Emergency) | 911 |
| (Non-emergency) | 913-477-7300 |

CAMPUS CRISIS PROCEDURES

In the event of an emergency or a dangerous situation, the President of Nazarene Bible College will make the decisions necessary. If the President is unavailable, the Title IX Coordinator/Vice President for Finance, the Vice President for Academic Affairs, the Vice President for Enrollment Management, and the Chief Information Officer will make the necessary decisions. The appropriate official will:

1. Confirm that there is a significant emergency, dangerous situation, or crime.
 - The confirmation process is a coordinated effort with the members of the NBC President's Cabinet and the Director of Financial Aid.
 - All members of the NBC community, students and employees, are expected to report any emergency or crime to the Director of Financial Aid. Upon the report of an emergency or crime the Director of Financial Aid will contact the appropriate Cabinet member(s).
 - If safety permits, the notified Cabinet member(s) will make every effort to confirm the emergency or crime through visual observation, otherwise observation by the Director of Financial Aid or two or more direct witnesses will be considered confirmation.
 - If the Director of Financial Aid receives notification from local law enforcement agencies or national weather agencies, NBC will consider the crime or emergency confirmed. The Security Director will notify the Cabinet in order to initiate the appropriate crisis response procedure.
2. Notify the campus community.
 - In the instance an *emergency notification* is necessary, the appropriate members of the NBC President's Cabinet will determine which segments of campus should receive a notification.
 - NBC will notify the entire on-campus community if the President or appropriate official determines that more than half of the campus is likely to be affected by the emergency.
 - The available Cabinet members and Security Director will continually evaluate the situation and NBC will notify additional segments if determined necessary.
 - If issuing a notification will compromise efforts to assist a victim, or contain, respond to, or otherwise mitigate the emergency, NBC will not administer a notification.
 - If a *timely warning report* is needed, it will be issued to all members of Nazarene Bible College, campus and online.
 - In the case an incident, previously requiring an *emergency notification*, escalates to include a Clery Act Crime, both an *emergency notification* and a *timely warning report* will issued for the same occurrence.
3. Determine the content of the announcement.

- Content of the announcement will be determined on a case-by-case basis and evaluate various factors such as who is receiving the announcement and the intended outcome of the announcement. For example, members on campus may receive an announcement directing them to take shelter while members off campus may receive an announcement directing them to stay away from campus – this variation would be aimed to serve the safety of different segments of campus appropriately.
 - Other factors that may be considered for insertion in an announcement include: preventive directions, a description of alleged perpetrator(s), whether there will be follow up announcements.
4. Initiate the appropriate announcement process in accordance with the specific details related to the emergency notifications vs. timely warning located in the following section.

Note: The Colorado Springs campus, specifically the Director of Financial Aid, is in possession of a communications radio, to be in contact with those in Springs First. This will be used to relay crisis information both to and from the Director of Financial Aid.

LENEXA OFFICE CRISIS PROCEDURES

In the event of a crisis, the Global Ministry Center will make NBC aware of the problem. In most of the crises that would arise, NBC will follow directions given by the Global Ministry Center. If for whatever reason, changes or additional decisions need to be made, the President’s Cabinet members will make those.

EMERGENCY NOTIFICATIONS AND TIMELY WARNING REPORTS ANNOUNCEMENT PROCESS

EMERGENCY NOTIFICATIONS

Emergency Notifications will be administered in consultation with and at the request of one or more of these campus security authorities: the President, the Title IX Coordinator or a relevant Cabinet member. In addition, emergency notifications related to severe weather may also be administered by the Security Director²⁸. Emergency notifications will be issued without delay unless doing so would compromise efforts to assist a victim or to contain, respond to, or otherwise mitigate the emergency. In all instances of emergency notifications the college will ensure that all personally identifying information is not released so as to protect the privacy of the victim and the accused. If alleged perpetrator information is needed to identify a potential threat NBC, in consultation with the local authorities, may release a description. NBC may utilize the following methods to administer emergency notifications:

- A notification will be sent to the college community via their communication selection in dCourseWeb (dCW).
 - It is required that anyone who would like to receive notifications through dCW sign up online.
 - i. Login to dCW and select “My Account”
 - ii. Under the Setting section select “User Preferences”
 - iii. Under the Specialties section select “Communication”

²⁸ See Appendix II for procedures for severe weather emergency notifications.

- iv. Select the preferred type of notification(s): Emergency Email Alerts, Phone Call Alerts, or Text Message Alerts
 - o Employees that do not have dCourseWeb access can gain access through the Payroll Specialist.
 - o Other users of NBC facilities can receive access through the Support Staff for Academic Affairs.
- A verbal page may be sent via the in house phone system.
- NBC may issue a mass e-mail to the college community.
- Students may also be contacted through the Director of Student Success or his/her designee.

The type of notification(s) will be determined on a case-by-case basis to ensure safe and effective communication.

TIMELY WARNING REPORTS

Timely Warnings are administered with the intent to enable the campus community to protect themselves following a criminal incident. Though NBC strives to protect confidentiality, if it is necessary, NBC will include personally identifying information to ensure overall campus safety and security.²⁹ The determination to include personally identifying information will be made on a case-by-case basis by the appropriate Cabinet member(s). Anytime a timely warning is issued, NBC will issue the warning to the *entire college community* through one or multiple of the following methods:

- a. A notification may be sent to the student community via their communication selection in dCourseWeb (dCW).
 - o It is required that anyone who would like to receive notifications through dCW sign up online.
 - i. Login to dCW and select “My Account”
 - ii. Under the Setting section select “User Preferences”
 - iii. Under the Specialties section select “Communication”
 - iv. Select the preferred type of notification(s): Emergency Email Alerts, Phone Call Alerts, or Text Message Alerts
 - o Employees that do not have dCourseWeb access can gain access through the payroll specialist.
- b. A verbal page may be sent via the in house phone system.
- c. NBC may issue a mass e-mail to the college community.
- d. Students may also be contacted through the Director of Student Success or his/her designee.

The type of warning will be determined on a case-by-case basis to ensure safe and effective communication.

ADDITIONAL SAFETY ALERTS

In addition to the items described above, NBC may issue safety alerts to part or all of the NBC community.

- Safety alerts may be issued in situations such as, but not limited to:
 - o An incident that occurs on campus that affects the personal safety and security of the campus population:

²⁹ FERPA and the Timely Warning citation 34 CFR 99.31(b)(6) and 96.36

- i. Power outage
 - ii. Unsafe snow conditions
 - iii. Phishing or other threats to NBC’s online community
 - iv. Conditions posing potential concern requiring raised awareness
 - An incident that occurs in close proximity to the campus that may potentially affect the personal safety and security of the students, faculty and staff population.
- Safety alerts will be issued using the same procedure as outlined above with the following means of communication:
 - Postings in the campus center, or other campus buildings
 - Posting of notification on flashalert.net: it is required that anyone who would like to receive notifications through FlashAlert sign up online.
 - i. Open the link above or type <https://www.flashalert.net/id/NBC> into any browser other than Internet Explorer
 - ii. Type your e-mail address into the Primary email address for a new account field
 - iii. Ensure that the box next to “Emergency Alerts” is selected
 - iv. Press subscribe
 - v. Confirm email address and create password
 - vi. If desired, download FlashAlert app on your mobile device and link your account – manage your account settings as preferred
 - Communication via dCourseWeb (dCW)
 - E-mail to students, faculty or staff
 - Communication to campus community through telephone system

PROCEDURES DURING A CRISIS

During a crisis situation NBC campus security authorities will direct its campus members to evacuate or take shelter-in-place. If direction from NBC campus security authorities is unavailable members of campus are encouraged to use personal judgment to ensure safety and prevent further crisis. The Lenexa office will receive their direction from the Global Ministry Center.

Evacuations:

An evacuation will occur when members of the NBC community are endangered should they remain in the building. Evacuations are initiated through fire alarms, verbal notification by the Security Director, direct observation, emergency notifications, timely warning reports and alerts as stated above. Each campus building evacuates to an assigned location previously provided to students and employees.

Shelter-In-Place:

Shelter-in-place will occur when evacuations are not recommended or possible. Shelter-in-place is initiated through notification by the Security Director, direct observation, emergency notifications, timely warning reports or alerts as stated above. Each floor of each campus building has designated a shelter-in-place area.

Taking action:

NBC does not encourage its community members to take action unless all other means of recourse have been exhausted. Individuals in crisis situations must determine if taking action is the only remaining option.

The NBC Campus Risk Management Committee reviews these procedures after drills or exercises and adjusts the procedures accordingly.

PROCEDURES FOR DISSEMINATING INFORMATION TO THE LARGER PUBLIC

All personnel must direct all media inquiries to the President to avoid confusion and ensure consistency of information given to the media. Should the President not be available, the Vice President for Academic Affairs or the Vice President for Enrollment Management, respectively, will assume spokesperson responsibilities.

Available members of the President's Cabinet will compose and approve information provided to the larger public. Information will be provided when accurate data is available and the disclosure will not compromise mitigation efforts. Personally identifying information regarding an alleged victim, alleged perpetrator, faculty, staff member, or student will not be disclosed.

The designated spokesperson will utilize available media (radio, television, print, internet, etc.) on a case-by-case basis.

Interviews with faculty, staff, or students on the premises are not permitted during a crisis, nor are videotaping or picture taking inside the buildings except in the spokesperson's office or designated media room.

TESTING OF CRISIS COMMUNICATION PROCEDURES

Nazarene Bible College routinely schedules drills and exercises to evaluate our emergency announcement processes, including emergency notifications and timely warning reports. Prior to each drill NBC publicizes to the campus community NBC's emergency response and evacuation procedures. A drill or exercise occurs at a minimum of once per year. The NBC Campus Risk Management Committee reviews and assesses the results of the drill³⁰ or exercise and makes recommendations to the Cabinet as needed.

dCourseWeb (dCW) Alert – a test of the alert is conducted on an annual basis. A notice of the scheduled test date is sent out. On that date a test alert is sent to all registered persons. A print out is available listing individuals registered in this system. This list is utilized to follow up with those registered to evaluate the effectiveness of the test. In addition to a test alert being administered, the dCW alert system is tested on an annual basis by the Information Technology (IT) department. A print record is produced by the system and maintained by IT.

In-house phone system – an annual test of the in house phone system is conducted after notification is dispersed in advance to the campus community. A follow up e-mail is sent to the employees of the NBC campus community to evaluate the effectiveness of the test.

³⁰ The documentation and review of each drill is maintained by the compliance office for a minimum of seven years.

Fire alarm – an annual test of the alarms is conducted in the building and includes an evacuation of personnel. Testing is scheduled and announced in advance. Evaluation of the exercise is conducted by the Risk Management Committee.

E-mails – The Information Technology department maintains e-mail availability continually. If you experience issues with your email, let IT know and they will help you.

EMERGENCY EQUIPMENT

Nazarene Bible College maintains a basic first aid kit for minor ailments/ injuries in the office of the Director of Financial Aid. In Lenexa, a basic first aid kit is available at the office of the account clerks or in the wellness rooms located around the building.

CLOSING COMMENTS

Nazarene Bible College strives to ensure an open and honest level of communication with regard to campus crimes and issues of safety and security in and around our campus. We hope that this information has helped you identify those features of the campus safety program that can assist you in having a good experience at NBC.

For the full publication of the NBC Sexual Misconduct Prevention: Policies and Procedures please visit nbc.edu/security.

In our efforts to continually enhance our safety program, we welcome your input regarding NBC's safety and security programs and services. You can provide your input through the Question, Concern and Complaint form found on the student portal or directly to the Title IX Coordinator/VP for Finance at SACadle@nbc.edu.

APPENDIX I

NBC CLERY GEOGRAPHY

According to Title 34 Institutional security policies and crime statistics, Clery Geography is defined as:

- (1) Any building or property that are owned or controlled by an institution within the same reasonable contiguous geographic area and used by the institution in direct support of, or in a manner related to, the institution's educational purposes, including residence halls; and
- (2) Any building or property that is within or reasonably contiguous to the area identified in paragraph (1) of this definition, that is owned by the institution but controlled by another person, is frequently used by students, and supports institutional purposes (such as a food or other retail vendor). 34 CFR 668.46(A) (Federal Student Aid an Office of the U.S. Department of Education, 2015)



Based on the definition above and the guidance provided in The Handbook for Campus Safety and Security Reporting, 2016 Edition, Nazarene Bible College has identified its Clery Geography to be within the boundaries drawn below:

Colorado Springs Campus



Lenexa Property



| | |
|---------------|---|
| Boundary Road |  |
| Fence Line |  |

APPENDIX II

CONFLICT OF INTEREST POLICY

It is the policy of the Nazarene Bible College to protect the institution's interests by ensuring that affiliates³¹ have the opportunity and responsibility to disclose the existence or potential existence of involvements, associations or bias that present a conflict of interest. This policy applies to NBC operations involving:

- Finances
- Title IX investigations
- Disciplinary proceedings

Nazarene Bible College requires that all affiliates disclose³² in writing to the appropriate individual or committee any and all involvements, associations or bias that may conflict with the financial or non-financial interests of the college. Financial or non-financial involvements, associations or bias may include but are not limited to: equity in the institution, personal or professional relationships, or prior/ privileged information or experience.

Upon disclosure the relevant NBC committee will evaluate and determine if a conflict of interest exists and, if so, the necessary course of action. Such action may include but is not limited to: no action, temporary or permanent change in position or responsibilities, or temporary or permanent removal from position or responsibilities. The individual involved will not be present during such meetings. All pertinent materials and the results will be compiled and retained by the relevant committee.

³¹ Affiliates include but are not limited to: board members, administrators, employees and students involved in institutional operations.

³² Disclosure procedures are listed in NBC's Whistle-Blowers Policy, Sexual Misconduct Disciplinary Policy, employee and student handbooks, Catalog, and other appropriate publications.

APPENDIX III

PROCEDURES FOR SEVERE WEATHER EMERGENCY NOTIFICATIONS (Colorado Springs):

1. The NBC Security Director receives notice from the National Oceanic and Atmospheric Administration (NOAA) radio that our area is under a severe weather watch/warning - this is considered confirmation of the emergency.
2. The NBC Security Director contacts the appropriate Cabinet member to inform them of the watch/warning.
3. The NBC Security Director (or member of the President's Cabinet) sends out the *emergency notification* for severe weather to the campus community via an e-mail based on the templates below and an additional *emergency notification* through dCW or the in-house phone system.

Tornado Warning:

“NBC Campus Community:

Please note there is a **Tornado Warning** for El Paso County, CO effective until ____ (8pm MDT). According to the National Oceanic and Atmospheric Administration a Tornado Warning is considered an imminent threat to life and property. **Take shelter-in-place immediately.** Proceed to an interior hallway or interior room (stay away from outside walls) on the lowest level of the building. Assume a kneeling position and cover the back of the head/neck with hands or coats to protect their eyes and heads once in the safest location. Face away from the area with greatest potential for injury from flying glass.”

Tornado Watch:

“NBC Campus Community:

Please note there is a **Tornado Watch** issued for El Paso County, CO effective until ____ (8pm MDT). According to the National Oceanic and Atmospheric Administration a Tornado Watch indicates a strong possibility of tornadoes in our area. **Please be aware, stay informed, and be prepared to go into shelter-in-place.** We will send out another emergency notification if the Tornado Watch turns into a Tornado Warning necessitating a shelter-in place.”

Severe Thunderstorm Warning:

“NBC Campus Community:

Please note there is a **Thunderstorm Warning** issued for El Paso County, CO effective until ____ (8pm MDT). According to the National Oceanic and Atmospheric Administration a Tornado Warning is considered an imminent threat to life and property. Go inside. Once inside stay away from windows and avoid electrical equipment and plumbing. If caught outside, take shelter in a sturdy enclosed building or hard top automobile immediately. Avoid open spaces, isolated objects, high ground and metallic objects. If a tornado is spotted act quickly and move to the lowest level basement of your shelter, putting as many walls between yourself and the outside as possible.”

Severe Thunderstorm Watch:

“NBC Campus Community:

Please note there is a **Thunderstorm Watch** issued for El Paso County, CO effective until _____ (8pm MDT). According to the National Oceanic and Atmospheric Administration a Tornado Watch indicates a strong possibility of tornadoes in our area. **Please be aware, stay informed, and be prepared to go take shelter-in-place.** We will send out another emergency notification if the Thunderstorm Watch turns into a Thunderstorm Warning necessitating a shelter-in place.”

PROCEDURES FOR SEVERE WEATHER EMERGENCY NOTIFICATIONS

(Lenexa):

In case of a weather emergency, at the GMC, building services will receive notification from the National Oceanic and Atmospheric Administration (NOAA) radio. They will then let the building know through email of any watches, and through the communication system on the phones for any warnings.

WORKS CITED

Article 54. - Crimes Against Persons. (2012). Retrieved September 15, 2017, from Kansas

Legislature

Federal Student Aid an Office of the U.S. Department of Education. (2015, October). *Consumer*

Information: Clery Act (Campus Security). Retrieved August 2016, from Consumer

Information

Northwestern. (n.d.). *Sexual Misconduct Response & Prevention*. Retrieved June 3, 2016, from

Northwestern University

Office of General Counsel: State University of New York. (2015, January). *Policy and*

Programming Changes Pursuant to the Campus SAVE Provisions of the Violence Against

Women Act. Retrieved August 29, 2016, from SUNY: The State University of New York

Sexual Violence Prevention Workgroup. (2016). *Definition of Affirmative Consent*. Retrieved

May 31, 2016, from SUNY The State University of New York

SUNY: The State University of New York. (2016). *Sexual Violence Response Policy*. Retrieved August 29, 2016, from Sexual Violence Prevention Workgroup

U.S. Department of Education Office for Civil Rights. (2015, April). *Title IX Resource Guide*. Retrieved 2016, from United States Department of Education

U.S. Department of Education Office of the Assistant Secretary . (2011, April). *Dear Colleague Letter*. Retrieved from OCR Office for Civil Rights

U.S. Department of Education, Office of Postsecondary Education. (2016). *The Handbook for Campus Safety and Security Reporting, 2016 Edition*. Washington, D.C.