

# University of Richmond Annual Security Report

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# Crime Statistics Annual Statistics for 2015, 2016, and 2017

Offense Type		Reporting Year	On Campus	Residential Facilities	Non- Campus Building or Property	Public Property*	Unfounded
Murder/Non- Negligent Manslaughter		2015	0	0	0	0	0
		2016	0	0	0	0	0
		2017	0	0	0	0	0
M	anslaughter by	2015	0	0	0	0	0
	Negligence	2016	0	0	0	0	0
	rvegngenee	2017	0	0	0	0	0
		2015	17	15	0	0	0
	Rape	2016	11	8	0	0	0
		2017	14	11	0	0	0
		2015	5	2	0	0	0
es	Fondling	2016	2	2	0	0	0
, ens		2017	4	3	0	0	0
JJO	Incest	2015	0	0	0	0	0
Sex Offenses		2016	0	0	0	0	0
		2017	0	0	0	0	0
	Statutory Rape	2015	0	0	0	0	0
		2016	0	0	0	0	0
		2017	0	0	0	0	0
		2015	0	0	0	0	0
	Robbery	2016	0	0	0	0	0
		2017	0	0	0	0	0
		2015	0	0	0	0	0
	Aggravated Assault	2016	1	0	0	0	0
	Assault	2017	1	1	0	0	0
		2015	20	7	0	0	4
Burglary		2016	9	3	0	0	1
	- •	2017	14	11	0	0	3
Arson		2015	3	0	0	0	0
		2016	0	0	0	0	0
		2017	0	0	0	0	0
1	Inton Wal-: -1-	2015	5	0	0	0	0
Motor Vehicle Theft		2016	3	0	0	0	1
		2017	2	0	0	0	0

# VAWA, Liquor, Drug, and Weapon Violations

Offense Type	Reporting Year	On Campus	Residential Facilities	Non- Campus Building or Property	Public Property*	Unfounded					
VAWA Violations											
G . 11 .	2015	3	0	0	0	0					
Stalking	2016	2	0	0	0	0					
	2017	0	0	0	0	0					
Datina	2015	10	7	0	0	0					
Dating Violence	2016	7	5	0	0	1					
	2017	2	1	0	0	0					
Domestic	2015	0	0	0	0	0					
Violence	2016	0	0	0	0	0					
	2017	0	0	0	0	0					
		Lic	uor Law Viol	ations							
	2015	17	6	0	0	0					
Arrest	2016	56	43	0	0	0					
	2017	10	8	0	0	0					
Referral	2015	198	180	0	0	0					
	2016	170	156	0	0	0					
	2017	155	124	0	0	0					
		D	rug Law Viola	tions							
	2015	15	15	0	0	0					
Arrest	2016	16	11	0	0	0					
	2017	13	11	0	0	0					
Referral	2015	22	21	0	0	0					
	2016	34	30	0	0	0					
	2017	25	15	0	0	0					
Weapons Law Violations											
	2015	1	0	0	0	0					
Arrest	2016	1	0	0	0	0					
	2017	0	0	0	0	0					
Referral	2015	2	2	0	0	0					
	2016	0	0	0	0	0					
	2017	0	0	0	0	0					

There was one race related hate crime reported in 2015. The 2015 hate crime was intimidation that occurred in Marsh Hall and the category of bias was anti-black. There were no hate crimes reported in 2016 and 2017.

#### **Procedures for Gathering Crime Statistics**

The University of Richmond Police Department is designated with the responsibility for the collection of data, preparation and distribution of this report. Data is collected using a university-

wide committee, University Campus Security Authorities and external law enforcement agencies to name a few resources.

Clery statistics do not include personal identifiers of the victim or the accused.

# **Definitions used for Reporting**

Offense statistical totals are mandated by Jeanne Clery Disclosure of Campus Crime Security Policy and Campus crime Statistics Act (Act).

The offenses for this report include Homicide, Manslaughter, Arson, Aggravated Assault, Robbery, Burglary, Hate Crimes, Motor Vehicle Theft, Rape, Fondling, Incest, and Statutory Rape. Also included is Stalking, Dating Violence offenses, Domestic Violence, liquor and drug law violations.

The crime log records all reported crimes and includes crimes that are addition to those required by the Clery Act.

**FBI UCR Program**- A nationwide statistical effort in which city, university and college, county, state, tribal, and federal law enforcement agencies voluntarily report data on crimes brought to their attention. The UCR program also serves as the basis for definitions of crime and for classifying crime in the ASR statistical report.

**Hierarchy Rule**- A requirement in the FBI's UCR program that, for the purposes of reporting crimes in the system, when more than one criminal offense was committed during a single incident, only the most serious offense be counted, in most situations.

- Murder and Non-Negligent Manslaughter is the willful (non-negligent) killing of one human being by another.
- **Negligent Manslaughter** is the killing of another person through gross negligence.
- **Sexual Assault** Any sexual act directed against another person, without consent of the victim, including instances where the victim is incapable of giving consent. Clery statistics include attempted sexual assaults. Sex offenses statistically counted for Clery include Rape, Fondling, Incest, or Statutory Rape as defined in the FBI UCR program.
- Rape is the Penetration, no matter how slight, of the vagina or anus, with any body part or object, or oral penetration by a sex organ of another person, without the consent of the victim.
- **Fondling** is touching of the private body parts of another person for the purpose of sexual gratification, without the consent of the victim, including instances where the victim is incapable of giving consent because of his/her age or because of his/her temporary or permanent mental incapacity.
- **Incest** is sexual intercourse between persons who are related to each other with the degrees wherein marriage is prohibited by law.
- Statutory Rape is sexual intercourse with a person who is under the statutory age of consent.
- **Robbery** is the taking or attempting to take anything of value from the care, custody, or control of a person or persons by force or threat of force or violence and/or by putting the victim in fear.

- **Aggravated Assault** is an unlawful attack by one person upon another for the purpose in inflicting severe or aggravated bodily injury. This type of assault usually involves a weapon or means likely to cause death or great bodily harm.
- **Burglary** is defined as the unlawful entry into a structure to commit a felony or theft and all attempts to commit the above mentioned.
- Motor Vehicle Theft, which is defined as the theft or attempted theft of a motor vehicle.
- **Arson** is any willful or malicious burning or attempt to burn, with or without intent to defraud, causing any public or private property to be destroyed.
- **Hate crimes** are defined for this report as crimes committed against a person that manifest evidence that the victim was intentionally selected because of the victim's actual or perceived race, gender, religion, national origin, ethnicity, disability, gender identity, or sexual orientation. For this report, the hate crime must have been for one of the criminal offenses listed in the report, larceny-theft, simple assault, intimidation, or destruction/damage/vandalism of property or any other crime involving bodily injury where the victim was intentionally selected because one of the above listed biases motivated the perpetrator.
- **Larceny** is the unlawful taking, carrying, leading or riding away of property from the possession or constructive possession of another.
- **Simple Assault** is an unlawful physical attack by one person upon another where neither the offender displays a weapon, nor the victim suffers obvious severe or aggravated bodily injury involving apparent broken bones, loss of teeth, possible internal injury, severe laceration, or loss of consciousness.
- **Intimidation** is to unlawfully place another person in reasonable fear of bodily harm through the use of threatening words and/or other conduct, but without displaying a weapon or subjecting the victim to actual physical attack.
- Vandalism is to willfully or maliciously destroy, damage, deface, or otherwise injure real or
  personal property without the consent of the owner or the person having custody or control of
  it.
- **Domestic Violence** (1) A felony or misdemeanor crime of violence committed: (i) by a current or former spouse or intimate partner of the victim; (ii) by a person with whom the victim shares a child in common; (iii) by a person who is cohabitating with or has cohabitated with the victim as a spouse or intimate partner; (iv) by a person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction in which the crime of violence occurred: or (v) by any other person against an adult or youth victim who is protected from that person's acts under the domestic or family violence laws of the jurisdiction in which the crime of violence occurred. Any incident meeting this definition is considered a crime for the purposes of Clery Act reporting.
- **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. The existence of such a relationship shall be determined based on the reporting party's statement and with consideration of the length of the relationship, the type of relationship, and the frequency of interaction between the persons involved in the relationship. For the purposes of this definition: dating violence includes, but is not limited to, sexual or physical abuse or the threat of such abuse.
- **Stalking** is engaging in a course of unwanted conduct toward a specific person (including surveillance, repeated phone calls, emails, text messages, social media messages or in-person

contact) that would cause a reasonable person to fear for their own safety or the safety of others or to suffer substantial emotional distress. A course of conduct means two or more acts, including, but not limited to, acts in which the person directly, indirectly, or through third parties, by any action, method, device, or means follows, monitors, observes, threatens, or communicates to or about, another person, or interferes with another person's property. Substantial emotional distress means significant mental suffering or anguish that may, but does not necessarily, require medical or other professional treatment or counseling. Any act that constitutes stalking under Virginia law is also prohibited under this policy. Stalking is sexual misconduct prohibited by the University. Any incident meeting this definition is considered a crime for the purposes of Clery Act reporting.

The Act requires that arrests and referrals for liquor law, drug abuse and weapon violations be reported.

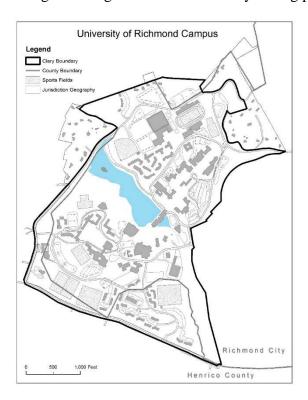
- **Liquor law violations** are defined as violations of laws or ordinances prohibiting the manufacture, sale, possession, transporting, or furnishing of intoxicating liquors or alcoholic beverages and all attempts to commit any of the aforementioned. (Public drunkenness and driving under the influence are not included).
- **Drug abuse violations** are defined as violations of State and local laws relating to the unlawful possession, sale, use, growing or manufacturing and making of narcotic drugs.
- Weapons possession violations are defined as violations of laws or ordinances dealing with weapon offenses, regulatory in nature, such as: manufacture, sale, or possession of deadly weapons, carrying of deadly weapons, concealed or openly, furnishing deadly weapons to minors, aliens possessing deadly weapons and all attempts to commit any of the above.

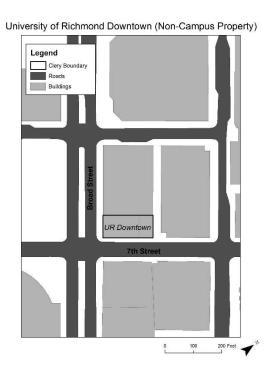
# I. Geography

The University of Richmond Police Department (URPD) defines the boundaries pertaining to the Clery Geography annually. The map is included annually in the Annual Security Report (ASR) and is available at URPD. The map was last updated in the summer of 2017 and reviewed in the summer of 2018.

The map of Clery Geography displays all buildings and grounds associated with the campus. All areas of the map within the Clery Boundary are considered on-campus, with the exception of Campus Drive, Boatwright Drive, College Road, and River Road. Those public roadways are classified as public property.

A list of buildings is maintained in URPD with all applicable addresses. Many addresses changed in August 2018 due to a wayfinding project completed on campus.





#### **II.** Police Department Description

URPD is a full-service police department with 22 sworn police officers, 5 security officers, 6 communications officers, and administrative staff. The department is one of only a handful of private institutions with a police department accredited by the Commission on Accreditation for Law Enforcement Administrators and the International Association of Campus Law Enforcement Administrators.

#### **III.** Crime Statistics

URPD is designated with the responsibility for the collection of data, maintenance of records, and preparation and distribution of this report. The crime statistics displayed at the beginning of the ASR were collected using a university-wide committee, university Campus Security Authorities (CSA), and external law enforcement agencies to name a few resources.

#### **IV.** Campus Security Authorities

URPD is ultimately responsible for identifying and maintaining the list of CSAs. A committee comprised of members from URPD, Human Resources, and Compliance participate in the creation of the list of CSAs. URPD and the Compliance Office maintain the current list of CSAs for the university. Each summer the list is updated. The most recent list was compiled in August 2018.

The university provides all CSAs with regularly scheduled training. In the training, CSAs are provided with the information and materials needed to document and submit reported crimes to URPD for inclusion in the crime statistics. CSAs are instructed to report crimes through online forms. There are separate forms for <u>faculty and staff</u>, and <u>students (RAs)</u>.

All crimes reported through those forms and other reporting structures are reviewed by URPD to determine the appropriate classification of crime, if any.

#### V. Statistics from Local Law Enforcement Agencies

URPD is responsible for collecting crime statistics from local law enforcement agencies. Throughout the year, information about student travel to off-campus locations is reported to URPD. URPD sends letters to the law enforcement agency responsible for locations where students traveled and requests crime statistics for the date(s), time(s) and location(s) traveled if the travel meets the standards identified by the Act.

The data collected from local law enforcement agencies is analyzed and maintained by URPD. The response, or lack of response, of each agency is documented by URPD. This policy and procedure for the collection of this data was last updated in December 2017.

#### VI. The Daily Crime Log

UPRD is responsible for maintaining the daily crime log. The most recent 60 days of the crime log is available on the <u>URPD's website</u>. The case disposition listed on the crime log is reviewed regularly for accuracy and is updated for 60 days after the incident's report date. Back-up copies of the daily crime log are maintained on the URPD's server.

Requests for a portion of the log that is older than 60 days, will be available within two business days of the request for public inspection. The full crime log is located in URPD, 490 Westhampton Way, Richmond, VA 23173. For more information about the crime log, contact Captain Eric Beatty (804) 651-9975 or <a href="mailto:ebeatty@richmond.edu">ebeatty@richmond.edu</a>.

In a rare situation when there is clear and convincing evidence that the release of such information would jeopardize an on-going investigation, safety of an individual, destruction of

evidence, or cause a suspect to flee, such information may be withheld until that threat is no longer likely to occur from the release of such information.

The daily crime log includes: the nature of the crime, the date and time the crime occurred, the general location of the crime, and the disposition of the complaint, if known. Information about accessing the crime log is sent annually to the university community through the ASR notification.

There are multiple employees within URPD trained to maintain and update the crime log as needed. These employees include: Records Supervisor, Emergency Communications Officers, and Services Captain.

#### **VII.** Emergency Response and Evacuation Procedures

The University of Richmond (UR) has an Emergency Notification System (ENS) with multichannel communication capabilities. The ENS is maintained and stored by the Director of Emergency Management. The policy is reviewed and updated regularly, with the most recent revisions in March 2018.

The UR ENS is intended to rapidly disseminate emergency information about an incident and provide instructions to the UR campus community. Emergency information is sent to registered users and through other ENS channels as identified in these Protocols.

The following University officials have been assigned the authority to authorize emergency notifications to provide alert, warning, and safety or protection instructions:

- University President
- UR Police Chief
- URPD Officer on Duty
- UR Communication Officer (for hail, high wind, and tornado warnings)
- Director of Emergency Management
- Executive Vice President and Chief Operating Officer
- Executive Policy Group Chairperson

The following university official(s), if they are directly involved with the emergency response for a safety-and-security incident at UR:

- Associate Vice President of Facilities
- Medical Director
- Director of Environmental Health and Safety

These positions will be collectively referred to as "Responsible University Authorities" for the purposes of these Protocols.

Senior University Officials who are directly involved with emergency response for safety-and-security incidents at UR are designated as "Responsible University Authorities." A Responsible University Authority is limited to issuing an immediate alert in response to an incident or event within their direct area of responsibility (as defined by agency/office mission and/or position description), and only in cases in which a delay could compromise the safety and security of the university.

At all times in these Protocols, reference to any position at the University shall be understood, in the absence of the referenced individual, to include designees.

The process for activating the UR ENS Protocols begins when a threat or emergency situation is reported to the URPD or to another Responsible University Authority. Emergency situations that require Immediate Notification must be confirmed by a Responsible University Authority, who will then authorize the emergency notification based on the operational guidelines of these Protocols.

For the majority of emergency threats and incidents on the UR campus, the first notice of the situation will be via an incoming call to the 8-9-1-1 URPD Dispatch Center. In the event of a threat or emergency in which the URPD Senior Officer on Duty is not yet at the incident and/or for which specialized technical knowledge is required, another Responsible University Authority may confirm the threat and authorize the message with emergency safety instructions. The Responsible University Authority will notify the URPD Dispatch Center and authorize the Communication Officer to issue the message. If the Responsible University Authority is trained in and has direct access to the UR ENS interface, the Responsible University Authority may issue the message if necessary.

The UR ENS consists of the following channels:

*UR Alert* is a messaging system controlled by a web-enabled management interface that allows an operator to simultaneously send outbound UR ENS messages via the following channels:

- Short Message Service (SMS) or text messages sent to mobile devices (including cell phones) which may also convert to an audible message if the phone is answered.
- *Phone calls* (and voicemails for unanswered calls) to registered phone numbers including cell and land lines (U.S. 10-digit numbers).
- E-mails to @richmond.edu accounts and any registered within the UR Alert portal.
- Social Media Accounts including Twitter and Facebook.
- University of Richmond website via a banner across the top of the page.
- Digital Signs throughout campus including menu boards within the dining locations.
- Desktop Alerts to University managed computer systems and public machines.

UR Alert is dependent on an individual "opt-in" registration in order to receive text messages and phone calls. Students, faculty and staff are encouraged to sign up for the service. Users can select up to three channels/contact points by which they wish to be notified of UR Alert. All registered users receive messages sent through channels the users have registered for.

The following additional UR ENS channels may also be activated independently of UR Alert:

Outdoor Warning System consists of three clusters of outdoor speakers centrally located on campus. It is capable of playing a recorded message or live audio from the URPD Communication Officer. The system is most frequently used to provide alert to persons outside to seek shelter indoors immediately due to an approaching tornado. At present, a siren runs continuously during a tornado warning and when the warning expires the siren stops.

*Internal Speakers* in Tyler Haynes Commons, Heilman Dining Center, Weinstein, and Boatwright Memorial Library are also able to play prerecorded messages or live audio from the URPD Communication Officer.

Classroom Paging Application, grouped by building, uses existing Avaya phone sets to support one way paging.

Additionally the following secondary channels are available to disseminate information:

*Voicemail to UR campus phones* will record outbound messages onto voicemail throughout the UR phone system.

*Posts to the UR Alert webpage* (alert.richmond.edu) may supplement the UR Alert format with more in-depth information and instructions.

*The UR hotline*, (804) 289-8760 or toll free at (866) 386-0403, is a recorded message system which provides status information.

*UR TV Channel 16* is connected to the National Weather Service (NWS) Emergency Alert System (EAS). When the EAS is activated, all cable channels connected to the head end will get a message scroll telling them to tune to Channel 16. Channel 16 then displays the information from the EAS.

All UR Alert messages will contain at minimum the following information, in this order:

- Nature of the incident,
- Location, and
- Actions to be taken by affected populations.

UR ENS messages generated via these protocols will follow formatting consistent with UR Alerts system characteristics. Therefore, regardless of channel used, UR ENS messages generated via these Protocols will use the same message of no more than 160 characters (the maximum number of characters available in a SMS message) for all message systems.

Additional or subsequent messaging via non-UR Alert channels (which are not constrained by technical limitations related to SMS) may use additional characters, as appropriate, to convey more information. As soon as possible following the issuance of an emergency message, the UR homepage and hotline will contain additional and/or supplemental information about the alert and/or the incident.

These will provide instructions for:

- Obtaining additional detailed information if university programs and/or services are interrupted,
- Receiving additional updates and information, and/or
- Reporting information.

The process for activating the UR ENS Protocols begins when a threat or emergency situation is reported to the URPD or to another Responsible University Authority.

There are three types of notifications under UR ENS, "Immediate," "Status Update," and "All Clear," which are described on the following pages.

An Immediate Notification to the campus is made when the URPD or another Responsible University Authority *confirms* that an emergency situation poses an *immediate* threat to life safety or security of the campus population. The URPD Senior Officer on Duty, URPD Communication Officer (for high wind, hail, and tornado warnings), or another Responsible University Authority is authorized to make an Immediate Notification to provide alert, warning, and safety or protection instructions.

However, the URPD Senior Officer on Duty or other Responsible University Authority also has the authority *not* to authorize an Immediate Notification to the campus if issuing the message will create a more serious emergency and/or compromise the University's efforts to contain the emergency. If the URPD Senior Officer on Duty, or other Responsible University Authority makes a decision *not* to authorize an alert, he or she must immediately notify and consult with the UR Police Chief.

As necessary, the UR Police Chief notifies the Executive Vice President and Chief Operating Officer and the Director of Emergency Management of the situation, notifications authorized/issued (or not authorized/issued), and any other actions taken; as needed, the Executive Vice President and Chief Operating Officer then notifies the University President and other officials, including University Communications for situations in which informational updates via voicemail to UR campus phones, posts to the UR homepage, and/or use of the UR hotline will be appropriate.

At any time, if more than one operator attempts to log into the UR ENS interface, or if a URPD Communication Officer or other operator is given conflicting instructions, the system operator will defer to the most recent information or that provided by the highest ranking individual.

For ongoing incidents or situations, such as a fire, a Status Update should be provided at a minimum every thirty minutes after an initial UR Alert was sent to the entire campus community. A Status Update alerts the community that the incident is ongoing and the area should be avoided. Additionally, it directs individuals to <a href="http://alert.richmond.edu/">http://alert.richmond.edu/</a> where more information may be provided.

An All Clear Notification indicates that the emergency has ended.

All notifications should be timed such that SMS messages do not overlap. Status Update and All Clear Notifications are authorized by the person who has incident command, which may be the URPD Senior Officer on Duty, UR Police Chief, Director of Emergency Management, or other Responsible University Authority.

At least annually, a test of the ENS is conducted. The ENS tests are typically announced via email and SpiderBytes. A description of each test, date, time and whether it was announced or unannounced is maintained by the Director of Emergency Management in an after action report. A summary of each test is sent to educate the community about emergency response, procedures, and applicable lessons learned, if any.

#### **Evacuation Procedures**

Prepared students, faculty, and staff are a priority of the University of Richmond. Students, faculty, and staff should be familiar with applicable emergency plans and procedures as well as

evacuation routes. As such, emergency response and evacuation procedures are communicated with the campus through several methods depending on the community member's classification. These methods include, but are not limited to, signage within buildings, an email to faculty each semester, seasonal poster campaign, orientation events, residence life and new employee training. Information about how to prepare as well as the types of emergencies that occur on campus is also available online.

With the exception of residence halls, a Building Emergency Plan (BEP) was developed for each building on campus. Developed to comply with OSHA 29 CFR 1910.38 the BEPs at a minimum must include the following information:

- Procedures for reporting a fire or other emergency:
- Procedures for emergency evacuation, including type of evacuation and exit route assignments;
- Procedures to be followed by employees who remain to operate critical operations before they evacuate;
- Procedures to account for all employees after evacuation;
- Procedures to be followed by employees performing rescue or medical duties; and
- The name or job title of every employee who may be contact by individuals who need more information about the plan or an explanation of their duties under the plan.

To fulfill compliance, a Building Emergency Coordinator, to include an alternate, as well as floor monitors was identified for each building with an BEP. Building Emergency Coordinator serve as the key contact for their building during an emergency, ensure all building occupants are aware of and trained on the BEP. Floor monitors provide direction about sheltering in place or evacuating the building as dictated by the event and account for building occupants after an evacuation. A list of Building Emergency Coordinators to include Building Emergency Plans is available online.

#### **VIII.** Timely Warning

URPD maintains the timely warning policy for UR. The timely warning policy was last revised in June 2017. It is the responsibility of the URPD to distribute timely warning notifications for any reported Clery Act crime occurring within the institution's Clery geography that is considered to represent a serious or continuing threat to the university community. The warning is distributed community-wide using the university's email system. The criteria and considerations listed below are used to determine if a timely warning is appropriate.

- Does the incident involve one of the crimes below?
  - o Murder/Non-negligent manslaughter
  - o Aggravated assault
  - o Rape, Fondling, Incest, Statutory Rape
  - o Robbery
  - o Burglary
  - o Arson
  - Motor Vehicle Theft

- o Stalking
- o Domestic Violence
- o Dating Violence
- Hate Crimes
- o Other Crimes as determined by the Chief of Police or designee.
- What is the location of the crime? Did the crime occur on property that is owned, leased, or controlled by the university (1) on campus, (2) on campus in a residence hall, (3) on public property within or immediately adjacent to campus, and (4) in or on non-campus property or buildings that the university owns, controls, or leases, is frequented by students and used in support of educational purposes?
- Is there a serious or ongoing threat to the campus community because of the reported incident?
- Has the perpetrator been apprehended?
- What is the timeframe between the report of the incident and the date of the incident? Does the date of incident and report date occur within the same semester, month, or year?
- Does the incident appear to be isolated or a pattern of behavior?
- Does the suspect/complainant (if known) have a prior criminal history or a history of failure to comply with university directives or protective measures?

The Chief of Police or designee is responsible for approving and issuing a timely warning. Each warning is decided based on a case-by-case basis considering the totality of the circumstances surrounding that incident.

The Chief of Police or designee shall contact the university's PIO for distribution of the warning. There may be incidents in which other forms of notification may be used such as student meetings, the Collegian, or local media.

URPD has requested for the City of Richmond Police Department and Henrico County Division of Police to notify URPD when emergency situations exist and/or crimes have occurred close to UR's campus. This is important to ensure appropriate emergency notifications and timely warnings are issued.

#### IX. Annual Security Report Policy Statements

As required by federal law the following policies are available at the links below.

**Policy Prohibiting Sexual Misconduct** 

Standards of Student Conduct

#### **Alcohol and Drug Policy**

Current campus policies regarding procedures for students and others to report criminal actions or other emergencies occurring on campus.

The University of Richmond encourages our community members to promptly and accurately report crimes to URPD. Community members who become aware of any possible crime are encourage to report that crime to URPD and assist victims who may elect not to or be unable to report the crime. Crimes may be reported any time day or night. URPD shall provide assistance with reporting any crime that may have occurred outside its jurisdiction. Prompt reporting allows the University to inform victims of resources available to them, mitigate future criminal activity, and assist the institution with notifying the rest of the community if there is a serious or ongoing threat to campus safety.

- Crimes may be reported in person 24 hours a day, at the police department, which is located on the ground floor of the Special Programs Building, 490 Westhampton Way, Richmond, VA 23173
- Crimes or emergencies on the campus of the University of Richmond may be reported to URPD by phone. When dialing from an on-campus phone, 8911 (emergency) or 8715 (nonemergency).
- From off-campus or cell phones, individuals are told to call 804-289-8911 (emergency) or 804-289-8715 (non-emergency). It should be noted that when using a cell phone to call URPD, callers should dial 804-289-8911 as dialing 9-1-1 directly may route them to another agency. If an individual is routed to another police department, the individual will need to advise the jurisdiction fo the individual's specific location at the University of Richmond so that the appropriate jurisdiction's responders may relay that information to URPD.
- Crimes or emergencies on the campus of the University of Richmond may be reported to URPD by on of the fifty-two (52) emergency telephone locations throughout the campus, designated by blue lights for easy identification at night. Picking up the receiver or pressing a button activates the emergency telephones. The phones are directly connected to the Police Communications Center, which is staffed 24 hours each day. The location of the activated telephone is automatically identified to the Emergency Communications Officer.
- Crimes may be reported anonymously by utilizing URPD's App "LiveSafe". Download the
  UR LiveSafe app from the App Store or Google Play. Register with your email and fill out
  your profile. Select University of Richmond as your campus. Crimes may be reported using
  the safety component of our University of Richmond mobile app which can be downloaded
  at <a href="https://www.richmond.edu/app/">www.richmond.edu/app/</a>

# Does this statement include your institution's policies concerning its response to these reports?

It is the policy of URPD to assist the university community in the most efficient and effective manner possible when responding to calls for service and reported crimes.

Does this statement include policies for making timely warning reports to members of the campus community regarding the occurrence of Clery Act crimes?

It is the responsibility of the URPD to distribute timely warning notifications for any reported Clery Act crime occurring within the institution's Clery geography that is considered to represent a serious or continuing threat to the university community. The warning is distributed community-wide using the university's email system.

Does this statement include policies for preparing the annual disclosure of crime statistics?

The University of Richmond Police Department, along with the Clery Compliance Committee, annually compiles statistical and informational data that is utilized for the purpose of compliance with the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act (Clery Act). The department formulates, updates, and distributes a document that is specifically designed to comply with this law. The Clery Act Annual Security & Fire Report is submitted, according to federal law, to the Department of Education annually.

Does this statement include a list of titles of each person or organization to whom students and employees should report criminal offenses described in the law for the purpose of making timely warning reports and the annual statistical disclosure? This statement also must disclose the institution's policies or procedures for victims or witnesses to report crimes on a voluntary, confidential basis for inclusion in the annual security report?

All crimes or emergencies that occur on the University of Richmond campus should be reported to the University Police by calling 804-289-8911, or 911 from a campus phone, to speak to the Communications Center. Crimes may also be reported in person at the police department, which is located on the ground floor of the Special Programs Building, 490 Westhampton Way, Richmond, VA. 23173.

The LiveSafe Application is available to community members to report concerning behavior, safety hazards, and crimes. This application allows two-way, real-time interaction with our communications center that include location-tagged text, calls, photos and videos. The application allows for confidential and anonymous crime reporting.

Current policies concerning the law enforcement authority and jurisdiction of campus security personnel?

The jurisdiction of police officers includes the grounds and buildings of the University and the adjacent streets, alleys and sidewalks located in the City of Richmond and the County of Henrico. Such campus police officers have the powers and authority conferred by law upon police officers of cities, towns or counties as provided in Virginia Code Sections 23-234 and 23-232.1 et seq..

Current policies concerning the working relationship of campus security personnel with state and local law enforcement agencies, including whether the institution has agreements with such agencies, such as written memoranda of understanding, for the investigation of alleged criminal offenses?

URPD coordinates with local law enforcement to ensure they notify the university of situations on campus and in areas adjacent to campus that warrant emergency response, emergency notification or timely warning messages. URPD has an memorandum of understanding with Virginia State Police to investigate sexual assaults. Local agencies have mutual aid policies to provide assistance to URPD if requested.

Current policies that encourage accurate and prompt reporting of all crimes to the campus police and the appropriate law enforcement agencies.

The University of Richmond encourages our community members to promptly and accurately report crimes to URPD. Community members who become aware of any possible crime are encourage to report that crime to URPD and assist victims who may elect not to or be unable to report the crime. Crimes may be reported any time day or night. URPD shall provide assistance with reporting any crime that may have occurred outside its jurisdiction.

A description of procedures, if any, that encourage pastoral counselors and professional counselors, if and when they deem it appropriate, to inform the persons they are counseling of any procedures to report crimes on a voluntary, confidential basis for inclusion in the annual disclosure of crime statistics?

The University's pastoral and professional counselors are aware of options individuals have to report crimes that would allow the crimes to be included in the annual security report. There is not a formal policy; however, training through Title IX and conversations with URPD provide awareness of the reporting options and procedures to follow.

A description of the type and frequency of programs designed to inform students and employees about campus security procedures and practices and to encourage students and employees to be responsible for their own security and the security of others?

Employees of the Police Department provide security awareness and crime prevention presentations during orientation for new students, on boarding for new employees, participants in study abroad, international students and a host of groups across campus. Several of the programs below also include information for attendees regarding personal safety, and security procedures and practices.

A description of programs designed to inform students and employees about the prevention of crimes?

The University of Richmond is a certified Virginia Department of Criminal Justice Services Crime Prevention Campus. <a href="https://www.dcjs.virginia.gov/law-enforcement/programs/crime-prevention-center#CCP-CP">https://www.dcjs.virginia.gov/law-enforcement/programs/crime-prevention-center#CCP-CP</a>

Several presentations provide attendees with information about preventing crimes. Programs URPD coordinates include:

#### • Operation ID

Operation Identification is a nationally recognized theft prevention program that involves marking or engraving property with UV pens and traceable ownership information and recording manufactures' serial numbers and owner –applied identification information on a property inventory form. The University of Richmond Police Department promotes Operation ID at no cost to discourage the theft of valuables.

This program is available anytime to our students, faculty and staff. Community members are encouraged to contact the Police Department at 804-289-8715 to learn more about the program or to set up a session to have your valuable property marked.

• Live Safe

A mobile safety technology that links the UR community with URPD and provides personal safety options.

• Vehicle Safety Checks

Once a semester URPD creates a vehicle inspection station to address minor mechanical problems just before students depart for a holiday break. In addition, Officers provide information related to properly securing property within a vehicle and out of plain view. In 2016, 284 vehicles were inspected.

• Active Threat Presentations

Presentations are provided across campus to faculty, staff and students. The University of Richmond

Follows the Run, Hide, Fight response to active threats.

• Women's Self Defense

The University of Richmond Police Department offers basic women's self-defense class to all female students, faculty and staff members. The course is dedicated to teaching females how to feel confident in any situation they may encounter during an attack and provide safety awareness tips to help avoid putting themselves in dangerous situations. Students will learn verbal skills and physical techniques to defend against grabs, holds, and bedroom attacks.

• Narcotic Identification, Detection, And Abuse

A University Police presentation that identifies the most commonly abused narcotics and controlled substances; it also highlights the most popular methods of obtaining and concealing these drugs. Participants are advised of the health risks associated with drug abuse and the legal ramifications resulting from illegal usage. This program is available upon request and is normally presented in residence hall programs and/or other University social groups.

• Lighting Surveys

URPD conducts detailed bi-weekly lighting surveys across campus to identify outages and works closely with facilities to address the required repairs.

Alcohol Awareness Programs

Students are presented with information about the effects of alcohol on the body and driving under the influence.

Campus Safety Walk

A night walking tour with students, faculty and staff to hear student concerns related to CPTED issues across campus. In 2016, the university President participated in the walk.

• Campus Blue Lights (Emergency Reporting Telephone Systems- ERTS)

The University maintains 38 blue light phones across campus which are directly linked to the URPD Communications Center.

• University Transportation and Security Escort

The campus Loop spur of the university transportations system provides safe transportation at night

To on campus locations. The hours vary but operate until 3:00 am on weekends. A security escort is available to students by contacting URPD at 289-8715.

• Bicycle Registration

Assistance is provided to the university community to register their bikes to deter theft. As a safety feature, each registrant is also offered a bicycle light for operating at night.

• Housing Security

The University Housing operates 37 residential buildings. Exterior doors are locked and can only be opened with a UR ID Card. Individual rooms are secured with a deadbolt and the university is converting key systems to keyless entry with a specialized security code. In addition, Resident Assistants are Campus Security Authorities and work closely with Residence Life and URPD.

• Behavioral Intervention Team

URPD is a member of this interdisciplinary team that assesses and responds to emerging at risk behaviors that have been brought to the attention of the team.

Threat Assessment Team

URPD is a member of this interdisciplinary team that assesses and responds to threatening behaviors and dangerous incidents involving students, faculty or staff.

• Victim/Witness Services

A victim/witness coordinator provides general information regarding the court process. Other services include but not limited to, transportation to/from magistrates, court, Protective Order obtainment or a trip to a hospital.

Ensures that every victim is provided with the right resource (both on and off campus) information to assist in concerns or trauma related to being a victim of a crime.

• Campus Security Surveys

URPD conducts proactive surveys of campus when renovations and construction of buildings occur. Additionally, URPD will survey offices, departments and dormitories upon request by community members.

#### Community Concerns

URPD maintains a <u>webpage</u> that allows community members to send information to departments on campus regarding the actions of students in the local neighborhoods.

A policy concerning the monitoring and recording, through local police agencies, of criminal activity in which students engaged at off-campus locations of student organizations officially recognized by the institution, including student organizations with off-campus housing facilities?

The University of Richmond cannot monitor the environment external to the University campus. It is an expectation that each individual respect the University's valuation of personal responsibility and accountability. The University reserves the right to become involved in disputes between students living off campus and neighbors. These situations may include:

- Any action that constitutes a criminal offense as defined by federal, Virginia, Henrico or Richmond ordinances. This includes, but not limited to, single or repeat violations.
- Any situation where it appears that the student may present a danger or threat to the health or safety of him/herself or others;
- Any situation that significantly impinges upon the rights, property, or achievements of self or others, or significantly breaches the peace and/or causes social disorder; and/or
- Any situation that is detrimental to the educational interests of the University.

The University of Richmond is committed to working with Henrico County and the City of Richmond to encourage responsible social conduct on and around our campus.

A policy regarding the possession, use and sale of alcoholic beverages and enforcement of state underage drinking laws?

The University of Richmond does not condone the illegal or otherwise irresponsible use of alcohol. In accordance with federal and state law, the University prohibits the unlawful possession, sale, use or distribution of alcohol on University property. The University of Richmond Police Department has the primary responsibility for the enforcement of state and federal laws pertaining to alcohol and drugs.

A policy regarding the possession, use and sale of illegal drugs and enforcement of federal and state drug laws?

The University of Richmond does not condone the illegal or otherwise irresponsible use of alcohol. In accordance with federal and state law, the University prohibits the unlawful possession, sale, use or distribution of alcohol on University property. The University of Richmond Police Department has the primary responsibility for the enforcement of state and federal laws pertaining to alcohol and drugs.

A description of any drug or alcohol abuse education programs as required under Section 120(a) through (d) of the HEA. For the purpose of meeting this requirement, an institution

may cross-reference the materials it uses to comply with Section 120(a) through (d) of the HEA?

#### • URWell

<u>Counseling and Psychological Services</u> and the <u>Student Health Center</u> both screen for substance abuse problems and can refer to off-campus resources.

#### • Alcohol Edu for Sanctions

Alcohol Edu for Sanctions is an online alcohol education program designed to reduce hazardous alcohol use and the serious consequences that follow. This program combines personalized feedback, professional narration, interactive exercises, and proven intervention techniques to engage students in powerful learning experiences.

#### • Educational Programs

Educational programs are offered to student groups, organizations, and residence halls to help students learn more about alcohol, how it can affect them, and what choices they want to make about consuming alcohol.

#### • Prevention Counseling

If a student is hospitalized as a result of alcohol consumption, the coordinator of substance abuse education meets with the student to discuss the incident and to develop a plan to prevent this from reoccurring in the future.

• Reduce Impairment through Supplementary Knowledge (RISK)

Reduce Impairment through Supplementary Knowledge (RISK) comprises three 90-minute group sessions facilitated by a community substance abuse counselor. While enrolled in this course students will gain an understanding of the risks and consequences of using alcohol or other drugs. The facilitator will assess student choices; explain the continuum from use, to abuse, to dependence; and who is at risk. Students learn about self care, responsibility and the importance of balance in their college environment.

#### • TIPS Training

TIPS Training is an hour-long session to teach residents in the University Forest Apartments how to identify guests that have consumed too much alcohol and techniques they should use when confronting these students. TIPS Training is a requirement for apartment residents to register events with alcohol.

• WELL 085 Alcohol Education Graduation Requirement

The University of Richmond requires all full-time, degree seeking students to complete a comprehensive alcohol education and prevention program during their first semester on campus. Successful completion of the requirement is mandatory for graduation from the University. To fulfil the WELL 085 Graduation Requirement, students must complete the on-line course, Alcohol Edu, and the WELL 085 Alcohol Education and Prevention Workshop.

#### • Alcohol or Drug Evaluations

Students may be required to complete an alcohol or drug evaluation with a substance abuse counselor. These evaluations are completed at an off campus facility. The recommendations from the evaluation are shared with the Substance Abuse Education & Prevention Coordinator and the student is required to complete any recommendations described in the evaluation.

A statement that the institution will, upon written request, disclose to the alleged victim of a crime of violence (as that term is defined in Section 16 of Title 18, United States Code), or a non-forcible sex offense, the report on the results of any disciplinary proceeding conducted by such institution against a student who is the alleged perpetrator of such crime or offense? If the alleged victim is deceased as a result of such crime or offense, the next of kin of such victim shall be treated as the alleged victim for purposes of this paragraph.

Upon written request from an alleged victim of any crime of violence or a non-forcible sex offense, the final results of the institutional disciplinary proceeding regarding the alleged crime or offense. If the alleged victim is deceased as a result of the crime or offense, the next of kin of the victim shall be treated as the victim for purposes of this disclosure. This disclosure shall be limited to the name of the accused student, the violation found to have been committed or the finding that no violation was committed, and any sanction imposed against such student.

A statement regarding your institution's emergency response and evacuation procedures?

Above in Section VI.

A statement regarding your missing student notification procedures?

Below in Section X.

A description of the primary prevention and awareness programs for all incoming students and new employees?

#### Orientation

During <u>orientation</u>, every incoming student participates in three programs specifically dedicated to sexual misconduct prevention and response.

- In their Spiders C.A.R.E. presentation, students learn what <u>consent</u> consists of and how to know if they have it before engaging in sexual activity.
- Our Spiders for Spiders leaders help teach students how they can be an active bystander to prevent sexual and relationship violence.

• In their Know UR IX presentation, students learn about the University's Title IX <u>policy and procedures</u>, along with the support resources available to them.

#### **Sexual Assault Prevention for Undergraduates**

All full-time, degree seeking students must complete the Wellness Graduation Requirement. The Wellness Graduation Requirement has the following components: Alcohol Education & Prevention (WELL 085); Bystander Intervention – Every Choice (WELL 086) and the WELL 090 Health Topics courses

Sexual Assault Prevention for Undergraduates addresses the critical issues of sexual assault, sexual harassment, relationship violence and stalking. Built in collaboration with leading researchers and practitioners, Sexual Assault Prevention for Undergraduates is an interactive course designed to engage and empower students to create safe and healthy campus environments.

#### **Every Choice**

Beginning Fall 2018, all full-time, degree seeking students will participate in an online bystander module during their second year. This course will be completed within the first six weeks of the fall semester. Every Choice builds off of the Sexual Assault Prevention for Undergraduates Course; it moves students from awareness about sexual and relationship violence, to building skills and overcoming obstacles so they can act as active bystanders and intervene in problematic situations.

Current first-year students can expect to receive an email detailing the course and its process by May 2018.

#### **Compliance Training**

The University of Richmond is committed to operating as a model institution of higher education, sustaining superb faculty and staff and administering the institution with the highest standards of innovation and professionalism. As part of the University's <a href="Compliance Program">Compliance Program</a>, all employees are required to participate in training to ensure we comply with applicable laws and regulations.

All new employees are required to participate in Title IX, FERPA, and Workplace Safety training within their first 60 days of employment. Additional training may be required for specific roles and departments on campus.

# **Other Training**

In addition to the required training, training is available to all employees on a range of compliance topics such as:

- Campus SaVE
- FMLA Leave
- HIPAA Privacy Essentials
- Workplace Ethics
- Workplace Harassment Prevention

All compliance training is available through **UR Talent Web**.

A statement that the institution prohibits the crimes of dating violence, domestic violence, sexual assault and stalking as those terms are defined for purposes of the Clery Act.

The mission of the University of Richmond is to educate in an academically challenging, intellectually vibrant, and collaborative community dedicated to the holistic development of students and the production of scholarly and creative work. A Richmond education prepares students for lives of purpose, thoughtful inquiry, and responsible leadership in a diverse world. The University of Richmond values the dignity, worth, and contributions of all individuals and an inclusive community in which all members can engage meaningfully in institutional life and contribute to a community where all thrive.

The University of Richmond prohibits discrimination and harassment against applicants, students, faculty, or staff on the basis of race, religion, national or ethnic origin, age, sex, sexual orientation, gender identity, gender expression, disability, status as a veteran, or any classification protected by local, state, or federal law.

Consistent with its mission, values and commitment to non-discrimination, the University is unwavering in its commitment to prevent sexual violence, respond promptly to reports of any type of sexual misconduct, support survivors of sexual misconduct, and investigate and adjudicate reports in a manner that is prompt, fair and equitable to all parties involved.

The conduct prohibited by this Policy may also violate criminal laws. As such, the University encourages members of the campus community to report sexual misconduct to both the University's Title IX Coordinators and to the University Police Department.

The definition of "dating violence," "domestic violence," "sexual assault" and "stalking" as those terms are defined in the applicable jurisdiction?

Dating/Relationship Violence Dating or relationship violence is any type of violence, including sexual or physical assault or abuse, or the threat of such assault or abuse, between adults who are in a social relationship of a romantic or intimate nature. The existence of such a relationship will be determined based on the reporting party's statement and with consideration of the length of the relationship, the type of relationship, and the frequency of interaction between the persons involved in the relationship. Dating/relationship violence is sexual misconduct prohibited by the University.

Domestic Violence Domestic violence is an act of violence committed: (a) by a current or former spouse or intimate partner of the victim; (b) by a person with whom the victim shares a child in common; (c) by a person who is cohabitating or has cohabitated with the victim as a spouse or intimate partner; (d) by a person similarly situated to a spouse of the victim under Virginia law; or (e) by any other person against an adult or youth victim who is protected from that person's acts under Virginia law. Domestic violence is sexual misconduct prohibited by the University.

Sexual Violence Sexual violence is any physical sexual act or acts perpetrated against a person's will or against a person incapable of giving consent. Examples of sexual violence include non-consensual sexual contact and non-consensual sexual intercourse. Depending upon the

circumstances, sexual violence may also include dating/relationship violence or domestic violence. Sexual violence is sexual misconduct prohibited by the University

Stalking is engaging in a course of unwanted conduct toward a specific person (including surveillance, repeated phone calls, emails, text messages, social media messages or in-person contact) that would cause a reasonable person to fear for their own safety or the safety of others or to suffer substantial emotional distress. A course of conduct means two or more acts, including, but not limited to, acts in which the person directly, indirectly, or through third parties, by any action, method, device, or means, follows, monitors, observes, surveils, threatens, or communicates to or about, another person, or interferes with another person's property. Substantial emotional distress means significant mental suffering or anguish that may, but does not necessarily, require medical or other professional treatment or counseling. Any act that constitutes stalking under Virginia law is also prohibited under this policy. Stalking is sexual misconduct prohibited by the University.

#### The definition of "consent" in reference to sexual activity in the applicable jurisdiction?

Consent means clear and unambiguous agreement to engage in sexual activity as evidenced by words or actions that demonstrate a knowing and voluntary willingness to engage in mutually agreed upon sexual activity. Consent cannot be gained by force, duress, intimidation, coercion, ignoring objections, or taking advantage of another's incapacitation. Consent may not be inferred from silence or any other lack of active resistance. Consent may not be inferred from the way a person is dressed. Consent may not be assumed from the fact of spending money on another person (e.g., buying a meal on a date). Prior consent does not imply consent to future sexual acts. A current or prior consensual dating or sexual relationship, alone, does not imply consent to sexual activity or preclude a finding of sexual misconduct. In addition, consent to one type of sexual act does not automatically imply consent to any other type of sexual act. Consent may be withdrawn at any time through clear words 'or actions such as walking or running away, pushing the other party away, or attempting to physically stop the other party. Once a person withdraws consent, sexual activity must stop, regardless of the extent or nature of the sexual behavior that has occurred up to the moment that consent is withdrawn. For example, if one individual clearly says "no" and the other continues penetration or another form of sexual contact, it is sexual misconduct. Consent may not be given by the following persons:

- Individuals who are mentally incapacitated at the time of the sexual contact in a manner that prevents them from understanding the nature or consequences of the sexual act involved, including incapacitation as a result of alcohol or drug use;
- Individuals who are asleep, unconscious or otherwise physically helpless; and
- Minors.

# A description of safe and positive options for bystander intervention?

#### **Student Initiatives**

<u>Spiders for Spiders</u> is a student movement to end sexual violence in our community. Spiders for Spiders facilitates an interactive training that is intended to empower members of our student community to play an active role in ending sexual violence, relationship violence, and

stalking. Participants will learn realistic methods of intervening before, during, and after incidents of violence occur as well as how to support friends. Participants will leave with information about campus and community resources and with concrete tools to help create a culture where violence is not tolerated and where everyone is expected to do their part to keep our community safe.

This training is open to students who are interested in joining the movement to end sexual violence in our community and who want to learn ways to support survivors. To join this rapidly growing movement.

#### **University Initiatives**

<u>Every Choice</u> begins Fall 2018, for all full-time, degree seeking students who will participate in an online bystander module during their second year. This course will be completed within the first six weeks of the fall semester. Every Choice builds off of students' Sexual Assault Prevention for Undergraduates Course; it moves students from awareness about sexual and relationship violence, to building skills and overcoming obstacles so they can act as active bystanders and intervene in problematic situations.

#### Information on risk reductions?

#### Personal Safety

We are responsible and committed to maintain an environment in which a student can excel in the classroom, on the athletic field, through civic engagement, and enjoy a vibrant social life. Achieving this requires partnerships with our faculty, staff, and most important, our students. We have created a comprehensive crime prevention program to educate the community members about threats to the safety of persons and property. This philosophy requires all of the officers in the department to be well-versed in many facets of crime prevention.

Our prevention program minimizes and eliminates criminal opportunities and provides timely information. The Police Department encourages the University community to be responsible for ensuring the safety of themselves, their property and others; to be vigilant and observe your surroundings; to never put yourself in danger; and to report suspicious activity.

To contact the Police Department regarding a crime prevention question, concern or suggestion to improve the safety of the campus community:

- Call (804) 289-8715 and ask to speak with an officer
- Email us at police@richmond.edu
- Stop by the police department and ask to speak with an officer

A description of the ongoing prevention and awareness campaigns for students and employees that provide the same information as above?

#### **Every Choice**

Beginning Fall 2018, all full-time, degree seeking students will participate in an online bystander module during their second year. This course will be completed within the first six weeks of the fall semester. Every Choice builds off of the Sexual Assault Prevention for Undergraduates

Course; it moves students from awareness about sexual and relationship violence, to building skills and overcoming obstacles so they can act as active bystanders and intervene in problematic situations.

Current first-year students can expect to receive an email detailing the course and its process by May 2018.

#### **Compliance Training**

The University of Richmond is committed to operating as a model institution of higher education, sustaining superb faculty and staff and administering the institution with the highest standards of innovation and professionalism. As part of the University's <a href="Compliance Program">Compliance Program</a>, all employees are required to participate in training to ensure we comply with applicable laws and regulations.

All new employees are required to participate in Title IX, FERPA, and Workplace Safety training within their first 60 days of employment. Additional training may be required for specific roles and departments on campus.

In addition to campaigns discussed above other campaigns are discussed under crime prevention and awareness programs discussed in policy statements above.

Written information about the importance of preserving evidence that may assist in proving that the alleged criminal offense occurred or may be helpful in obtaining a protective order.

Immediate Actions: Any individual who has experienced sexual misconduct, is encouraged to do the following as promptly as possible:

- Get to a safe place as soon as possible.
- Try to preserve all physical evidence. Do not wash clothes or use the toilet. Put all clothing you were wearing at the time of the incident in a paper bag, not in a plastic bag. All physical evidence should be provided to police as soon as possible.
- Contact University Police by calling 8911 (from a campus phone) or (804) 289-8911. The University Police Department can assist in contacting other local law enforcement agencies for incidents occurring off campus. On campus, a blue light emergency phone will connect callers directly to the University Police dispatcher.
- Get medical attention as soon as possible. The University Police can provided transportation to the hospital if needed. A medical examination will provide any necessary treatment and collect important evidence. Injuries may not be immediately apparent. The Student Health Center can assist with injuries, preventative treatment for sexually transmitted diseases, and other health services.
- It is important to seek immediate and follow-up medical attention for several reasons:
  - o To assess and treat any physical injuries that may have sustained.
  - To determine the risk of sexually transmitted diseases or pregnancy and take appropriate medical measures.
  - o To gather evidence that may aid criminal prosecution.
- A special hospital exam (PERK: Physical Evidence Recovery Kit) should be performed by an emergency department. University students can receive the exam at St. Mary's Hospital or through the Virginia Commonwealth University Health System.

- The hospital emergency departments follow national standards for survivor care, sexual assault exams, and evidence collection procedures.
- Any one concerned about anonymity or having their parents being notified, can speak with hospital personnel regarding options for confidentiality. Inform the triage nurse of this request for anonymity upon arrival to an emergency room.

There are many resources available to survivors that may assist with PERK exam costs, and medical personnel will provide more information. At the hospital, survivors may choose to undergo a PERK exam even if they are unsure whether they want to report the sexual misconduct to the police and want time to think about it.

Hospital nurses will collect the evidence without revealing the identity of the survivor to the authorities. The evidence will be held for at least two years before being discarded. A survivor must contact the storage facility in writing for an extension beyond that point.

## How and to whom the alleged offense should be reported?

The University of Richmond strongly supports and encourages prompt reporting of sexual misconduct to the Title IX Coordinator and to the University Police Department. Reporting provides resources to survivors and contributes to keeping the campus safe. Unless designated as a confidential resource under Section V(E)(2)of this Policy, all Responsible Employees, as defined in Section III(F) of this Policy, are required to report incidents of possible sexual misconduct to the Title IX Coordinators and those employees designated as Campus Security Authorities must also report to the University Police.

# Reporting Sexual Misconduct to University Officials

Members of the University community who have experienced or know someone who may have experienced sexual misconduct, should report incidents to the University's Title IX Coordinators and to the University Police Department. Sexual misconduct may violate both this policy and criminal law. As a result, the University encourages Complainants to pursue their reports through both the University's procedures and through the criminal justice system. If a Complainant makes a report to the University Police or if the University Police otherwise become aware of possible sexual misconduct (for example, as a result of transporting a student to the hospital), the University Police will notify the Title IX Coordinator of the report. If the Complainant reports first to the Title IX Coordinator, the Title IX Coordinator will assist the Complainant with making a report to the University police, if the Complainant chooses to do so.

- University of Richmond Police Department. Reports to the University Police can be made 24/7 by calling 8911 (from a campus phone) or (804) 289-8911. On campus, a blue light emergency phone will connect directly to the University Police dispatcher. Members of the campus community may also contact Beth Simonds, Assistant Chief of Police, University Police 490 Westhampton Way, University of Richmond, VA. 23173, at (804) 289-8722, for general information about reporting options and the University's policies and procedures.
- Title IX Coordinators. Reports of possible sexual misconduct can be made to any one of the University of Richmond's Title IX Coordinators. Students should contact Tracy Cassalia, Deputy Title IX Coordinator for Students at (804) 289-8464. Faculty and staff should contact Carl Sorensen, Associate Vice President, Human Resources and Deputy Title IX

Coordinator, (804) 289-8166. They can discuss options on campus and make connections to resources in the University community. The University's Title IX Coordinators are Safe Zone Allies.

- Online Incident Report. All members of the University community can file a report using the
  University's online incident report form, located at <u>report.richmond.edu</u>. This form should
  not be used for emergency situations. In an emergency situation, please call the University
  Police at 8911 (from a campus phone) or (804) 289-8911. University faculty and staff using
  this form must provide all requested information, if known, including the name and contact
  information of the reporter.
- Anonymous Reporting. Students may file an anonymous <u>Reporting Form</u>. (Please note that University faculty and staff cannot use this form anonymously and must provide all requested information when making a report.)

Seeking Immediate Assistance: If you or someone you know has experienced sexual misconduct, please contact the University of Richmond Police Department, reachable 24 hours a day, at 8911 (from on-campus phones) or (804) 289-8911 (from cell phones or off-campus phones).

Students are strongly encouraged to report to the Title IX Coordinator.

For cases involving students, contact:

Tracy Cassalia, Deputy Title IX Coordinator for Students, at (804) 289-8464.

For cases involving faculty or staff, contact:

<u>Carl Sorensen</u>, Deputy Title IX Coordinator and Associate Vice President of Human Resource, at (804) 289-8166.

Members of the University community may also contact:

Kristine Henderson, Director of Compliance & Title Ix Coordinator at (804) 289-8186

Beth Simonds, Assistant Chief of Police, University Police, at (804) 289-8722.

Notify proper law enforcement authorities, including on-campus and local police?

Reporting Sexual Misconduct to University Officials Members of the University community who have experienced or know someone who may have experienced sexual misconduct, should report incidents to the University's Title IX Coordinators and to the University Police Department. Sexual misconduct may violate both this policy and criminal law. As a result, the University encourages Complainants to pursue their reports through both the University's procedures and through the criminal justice system.

If a Complainant makes a report to the University Police or if the University Police otherwise become aware of possible sexual misconduct (for example, as a result of transporting a student to the hospital), the University Police will notify the Title IX Coordinator of the report. If the Complainant reports first to the Title IX Coordinator, the Title IX Coordinator will assist the Complainant with making a report to the University police, if the Complainant chooses to do so.

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emergency phone will connect directly to the University Police dispatcher. Members of the campus community may also contact Beth Simonds, Assistant Chief of Police, University Police, at (804) 289-8722, for general information about reporting options and the University's policies and procedures.

# Be assisted by campus authorities in notifying law enforcement authorities if the victim chooses?

Reporting Sexual Misconduct to University Officials Members of the University community who have experienced or know someone who may have experienced sexual misconduct, should report incidents to the University's Title IX Coordinators and to the University Police Department. Sexual misconduct may violate both this policy and criminal law. As a result, the University encourages Complainants to pursue their reports through both the University's procedures and through the criminal justice system. If a Complainant makes a report to the University Police or if the University Police otherwise become aware of possible sexual misconduct (for example, as a result of transporting a student to the hospital), the University Police will notify the Title IX Coordinator of the report. If the Complainant reports first to the Title IX Coordinator, the Title IX Coordinator will assist the Complainant with making a report to the University police, if the Complainant chooses to do so.

# Decline to notify such authorities?

If the identity of the Complainant can be determined from the report or initial fact-finding, the Title IX Coordinator will contact the Complainant and provide the Complainant with a summary of their rights under this Policy and related University policies such as the Standards of Student Conduct, information about available support resources, interim remedial measures, and reporting to law enforcement.

The Title IX Coordinator shall also offer to meet with the Complainant. The Complainant has the right to select an advisor of their choice and may have the advisor present during all meetings with the Title IX Coordinator.

When the Title IX Coordinator meets with the Complainant, the Coordinator provides the following information:

- The Complainant's Title IX rights and rights under this policy and related University policies, including the Standards of Student Conduct;
- The University's obligation to treat both the Complainant and the Respondent fairly;
- The University's obligation to investigate promptly the reported sexual misconduct;
- The Complainant's reporting rights, including the right to pursue or not to pursue criminal action including options for investigation and prosecution in addition to the University of Richmond's sexual misconduct and student conduct process.

Where applicable, the rights of victims and the institution's responsibilities for orders of protection, "no contact" orders, restraining orders or similar lawful orders issued by a criminal, civil or tribal court, or by the institution?

If the identity of the Complainant can be determined from the report or initial fact-finding, the Title IX Coordinator will contact the Complainant and provide the Complainant with a summary of their rights under this Policy and related University policies such as the Standards of Student Conduct, information about available support resources, interim remedial measures, and reporting to law enforcement.

The Title IX Coordinator shall also offer to meet with the Complainant. The Complainant has the right to select an advisor of their choice and may have the advisor present during all meetings with the Title IX Coordinator.

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- The University's obligation to treat both the Complainant and the Respondent fairly;
- The University's obligation to investigate promptly the reported sexual misconduct;
- The Complainant's reporting rights, including the right to pursue or not to pursue criminal action including options for investigation and prosecution in addition to the University of Richmond's sexual misconduct and student conduct process;
- The importance of the collection and preservation of evidence;
- The importance of seeking appropriate medical attention;
- The available options for a protective order;
- The Complainant's right to participate or decline to participate in any investigation;
- The Complainant's right to an advisor of their choosing;
- Resources on campus and within the Richmond community, including counseling services, sexual assault crisis centers, and domestic violence crisis centers;
- Information about the investigation process and University procedures for pursuing a formal complaint against a student, faculty member, staff member, or third party, including the University's protections from retaliation;
- Examples of possible retaliation and procedures for reporting any acts of retaliation;
- Possible options for interim remedial measures to avoid contact with the Respondent and to ensure the Complainant's well-being, including: no contact orders, housing and academic accommodations, and/or changing transportation, dining, or working situations;
- Possible long-term remedies for the Complainant, including housing and academic
  accommodations, tutoring, medical services, and counseling; o The Title IX Coordinator's
  obligation to provide the Complainant with periodic updates as the investigation progresses;
  and
- The process for handling requests for confidentiality or requests not to investigate. The Title IX Coordinator will provide the Complainant time to consider their rights and options and to

determine whether the Complainant wishes to move forward with an investigation of the reported sexual misconduct.

Complete publicly available recordkeeping, including Clery Act reporting and disclosures, without inclusion of personally identifying information about the victim?

#### Confidentiality of Investigative Records

The University considers the records of a Title IX sexual misconduct investigation to be confidential and the University uses reasonable methods to protect the confidentiality of those records. Information gathered in the course of a sexual misconduct investigation will be disclosed to University officials only to the extent such officials require such information to perform their responsibilities to the University. Information gathered during an investigation may be shared with other involved students (for example the Complainant or Respondent) to the extent necessary to conduct a thorough and equitable investigation, in the course of a student conduct or other disciplinary proceeding, and as permitted or required by applicable law or court order.

Information gathered in the course of a sexual misconduct investigation will not be disclosed to third parties except as required by law, court order or with appropriate written consent.

The records of an investigation involving University students are considered to be education records subject to the Federal Rights to Privacy Act ("FERPA") and the University's FERPA policy.

Virginia law requires that a prominent notation be added to the academic transcript of any student who is suspended for, permanently dismissed for, or withdraws from the University while under investigation for an offense involving sexual violence. This transcript notation will be removed if a student is subsequently found not to have committed an offense involving sexual violence or if the student completes their term of suspension and is determined to be in good standing according to applicable University policy.

Health care and counseling records are confidential and will only be disclosed with appropriate written consent or as required by applicable law or court order. Students involved in a sexual misconduct investigation are encouraged to respect the privacy of the Complainant, the Respondent, and any witnesses by maintaining appropriate confidentiality. However, students are permitted to share appropriate information with counselors, parents, advisors, or members of the deans' offices. Additionally, Complainants or Respondents are permitted to disclose information for purposes of contacting potential witnesses and seeking documentary and other evidence from third parties.

The URPD crime log discloses only those elements required by the Clery Act and State Law. Those elements include: case number, report date and time, incident date and time, offense, location, injury, damage or loss, and disposition. The victim is not disclosed on the URPD crime log.

Maintain as confidential any accommodations or protective measures provided to the victim, to the extent that maintaining such confidentiality would not impair the ability of the institution to provide the accommodations or protective measures?

Confidentiality Requests to the Title IX Coordinator When a report is made to the Title IX Coordinator, the Title IX Coordinator has an obligation to commence an investigation of the report. However, the Complainant may request confidentiality and may share as much or as little information with the Title IX Coordinator as they choose. Additionally, the Complainant has the right not to participate in the Title IX investigation or the student conduct process. In cases in which the Complainant wishes to keep the report or incident confidential, chooses to keep their name, the name of the Respondent, the names of witnesses, and other information confidential, or decides not to file a formal complaint of sexual misconduct, the Title IX Coordinator will inform the Complainant that:

- Under Virginia law, personally identifiable information, including the name of the Complainant and Respondent, must be disclosed to the Sexual Misconduct Review Subcommittee;
- The Title IX Coordinator has an obligation to notify the University Police of a report of a possible crime, but, upon request of the Complainant, will do so without sharing the Complainant's name;
- Keeping the Complainant's name confidential or declining to identify the Respondent may limit the University's ability to investigate thoroughly the sexual misconduct complaint; and
- It may not be possible to ensure confidentiality and that, in some cases, the safety of others or the campus community requires the Title IX Coordinator to investigate despite the Complainant's request.

The Complainant has the right not does not wish to participate in the investigation or pursue a formal complaint. In such case, the Title IX Coordinator's will continue to make available to the Complainant support resources and will implement appropriate interim and long-term remedial measures.

A statement that the institution 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 for victims, both within the institution and in the community?

Any individual who has experienced sexual misconduct, is encouraged to do the following as promptly as possible:

- Get to a safe place as soon as possible.
- Try to preserve all physical evidence. Do not wash clothes or use the toilet. Put all clothing you were wearing at the time of the incident in a paper bag, not in a plastic bag. All physical evidence should be provided to police as soon as possible.
- Contact University Police by calling 8911 (from a campus phone) or (804) 289-8911. The University Police Department can assist in contacting other local law enforcement agencies for incidents occurring off campus. On campus, a blue light emergency phone will connect callers directly to the University Police dispatcher.

• Get medical attention as soon as possible. The University Police can provided transportation to the hospital if needed. A medical examination will provide any necessary treatment and collect important evidence. Injuries may not be immediately apparent. The Student Health Center can assist with injuries, preventative treatment for sexually transmitted diseases, and other health services.

It is important to seek immediate and follow-up medical attention for several reasons:

- To assess and treat any physical injuries that may have sustained.
- To determine the risk of sexually transmitted diseases or pregnancy and take appropriate medical measures.
- To gather evidence that may aid criminal prosecution.
- A special hospital exam (PERK: Physical Evidence Recovery Kit) should be performed by an emergency department. University students can receive the exam at St. Mary's Hospital or through the Virginia Commonwealth University Health System.
  - o The hospital emergency departments follow national standards for survivor care, sexual assault exams, and evidence collection procedures.
  - Anyone concerned about anonymity or having their parents being notified, can speak
    with hospital personnel regarding options for confidentiality. Inform the triage nurse of
    this request for anonymity upon arrival to an emergency room.
  - O There are many resources available to survivors that may assist with PERK exam costs, and medical personnel will provide more information. At the hospital, survivors may choose to 17 undergo a PERK exam even if they are unsure whether they want to report the sexual misconduct to the police and want time to think about it.
  - Hospital nurses will collect the evidence without revealing the identity of the survivor to the authorities. The evidence will be held for at least two years before being discarded. A survivor must contact the storage facility in writing for an extension beyond that point.

#### Counseling and Emotional Support Resources

# On-Campus Resources

- CAPS. Counselors at the University's Counseling and Psychological Services ("CAPS") are available to assist in a crisis and to provide information about options, including medical assistance, psychological counseling, University disciplinary procedures, and legal prosecution. CAPS counselors can be reached at (804) 289-8119 during regular office hours. The CAPS staff also maintains an on-call schedule for emergencies and may be reached through the University Police dispatcher at (804) 289-8715. Counselors at CAPS can provide safe, confidential support during this difficult period. They can inform you of common reactions to crisis situations and discuss coping methods that may assist you immediately following the misconduct and later. Talking about your concerns with one of these counselors may help you sort through feelings and decide what to do. You do not need to disclose your name if you call CAPS for information. Counselors will not reveal your identity to anyone without your permission. All CAPS Counselors are Safe Zone Allies and Title IX-trained.
- Safe Harbor Victim Advocate. The Safe Harbor Advocate (Advocate) is a confidential resource to students that have experienced, or are experiencing, sexual violence. The Advocate can assist students in understanding reporting options and navigating the reporting

- process, provide accompaniment to medical and legal services as requested, and aid with crisis intervention. The Advocate is located in Sarah Brunet Hall, Suite 136 and can be reached at (804) 801-6251.
- Chaplaincy. Members of the University community seeking pastoral care and support may contact the Office of the Chaplaincy at (804) 287-6501. Reports to ordained members of the Chaplaincy are confidential. (See Section V(E)(2) of this Policy).
- URPD Victim/Witness Services. The University of Richmond Victim/Witness Assistance Program is operated out of the University Police Department, which is located on the ground floor of the Special Programs, and may be contacted by calling (804) 289-8715, 24 hours a day, seven days a week. University of Richmond Detectives serve as liaisons between the City of Richmond and the County of Henrico courts systems. Detectives assist victims to obtain services to include counseling and psychological support, guidance to area resources, and assistance through the court process.

## Off-Campus Resources

- Richmond Regional Hotline. The Richmond Regional Hotline, available at (804) 612- 6126, is a crisis response system for people across the region impacted or affected by domestic, intimate partner, and/or sexual violence. Calling the hotline will connect callers to a local specialist who can offer support and information about resources and experts in the Richmond area. The hotline is available 24 hours per day and open to survivors and supporters. The YWCA, Safe Harbor, and other area organizations, sponsor it. The YWCA also provides support groups for survivors of sexual violence.
- Safe Harbor. Safe Harbor supports those who are experiencing or have experienced domestic and/or sexual violence. Safe Harbor offers comprehensive services for survivors of sexual and/or intimate partner violence including: a 24-hour helpline at (804) 287-7877, children/youth services, community education and training, counseling, court advocacy, emergency shelter, and hospital accompaniment.
- Virginia Anti-Violence Project. The Virginia Anti-Violence Project offers support for lesbian, gay, bisexual, transgender, queer, and questioning survivors of sexual assault and/or intimate partner violence as well as hate-motivated violence. The LGBTQ Partner Abuse and Sexual Assault Helpline is available Monday-Friday 8:00 am- 8:00 pm at 1-866-356-6998.

#### Other Available Resources

- Transportation The University Police are always available to transport victims of sexual misconduct to the hospital. To ask for transportation, call the University Police dispatcher at (804) 289-8715 and ask for immediate assistance.
- Non-Emergency Medical Procedures. Even if someone chooses not to have a hospital exam, it is still important to get medical attention. An exam, in these instances, will include treatment of any physical problems and lab tests for sexually transmitted diseases and/or pregnancy. Any non-emergency treatment can be arranged on campus by calling the Student Health Center at (804) 289-8064 and making an appointment.

A statement that the institution will provide written notification to victims about options for, available assistance in, and how to request changes to academic, living, transportation and working situations or protective measures? The institution must make such accommodations or provide such protective measures if the victim requests them and if they are reasonably

# available, regardless of whether the victim chooses to report the crime to campus police or local law enforcement.

If the identity of the Complainant can be determined from the report or initial fact-finding, the Title IX Coordinator will contact the Complainant and provide the Complainant with a summary of their rights under this Policy and related University policies such as the Standards of Student Conduct, information about available support resources, interim remedial measures, and reporting to law enforcement. The Title IX Coordinator shall also offer to meet with the Complainant. The Complainant has the right to select an advisor of their choice and may have the advisor present during all meetings with the Title IX Coordinator. When the Title IX Coordinator meets with the Complainant, the Coordinator provides the following information:

- The Complainant's Title IX rights and rights under this policy and related University policies, including the Standards of Student Conduct;
- The University's obligation to treat both the Complainant and the Respondent fairly;
- The University's obligation to investigate promptly the reported sexual misconduct;
- The Complainant's reporting rights, including the right to pursue or not to pursue criminal action including options for investigation and prosecution in addition to the University of Richmond's sexual misconduct and student conduct process;
- The importance of the collection and preservation of evidence;
- The importance of seeking appropriate medical attention;
- The available options for a protective order;
- The Complainant's right to participate or decline to participate in any investigation; o The Complainant's right to an advisor of their choosing;
- Resources on campus and within the Richmond community, including counseling services, sexual assault crisis centers, and domestic violence crisis centers;
- Information about the investigation process and University procedures for pursuing a formal complaint against a student, faculty member, staff member, or third party, including the University's protections from retaliation;
- Examples of possible retaliation and procedures for reporting any acts of retaliation;
- Possible options for interim remedial measures to avoid contact with the Respondent and to
  ensure the Complainant's well-being, including: no contact orders, housing and academic
  accommodations, and/or changing transportation, dining, or working situations;
- Possible long-term remedies for the Complainant, including housing and academic accommodations, tutoring, medical services, and counseling;
- The Title IX Coordinator's obligation to provide the Complainant with periodic updates as the investigation progresses; and
- The process for handling requests for confidentiality or requests not to investigate.

Describes each type of disciplinary proceeding used by the institution; the steps, anticipated timelines and decision-making process for each type of disciplinary proceeding; how to file a disciplinary complaint; and how the institution determines which type of proceeding to use based on the circumstances of an allegation of dating violence, domestic violence, sexual assault or stalking?

Describes the standard of evidence that will be used during any institutional disciplinary proceeding arising from an allegation of dating violence, domestic violence, sexual assault or stalking?

Student Conduct Board's determination shall be made based on a preponderance of the evidence standard, meaning that in order to find the Respondent responsible, the Student Conduct Board must find that the greater weight of the evidence presented at the hearing supports a finding of responsibility for the violations(s) of Article III (B) with which the Respondent was charged. A preponderance or the greater weight of the evidence is a matter of quality, not quantity.

Lists all the possible sanctions that the institution may impose following the results of any institutional disciplinary proceeding for an allegation of dating violence, domestic violence, sexual assault or stalking?

- List of Possible Sanctions. Violations of prohibited conduct as outlined in Article III of the Standards of Student Conduct may result in one or more of the following disciplinary sanctions. Additional sanctions, if any, are listed in the handbooks or official announcements of the School or College concerned. Following a determination of responsibility by a Student Conduct Board as outlined in Articles V and VI, the board will impose sanctions from the following:
  - Disciplinary Warning. A written notice that a continuation or repetition of prohibited conduct, within a specified period of time, will be grounds for more serious disciplinary action.
  - Residential Housing Probation. Action permitting the student to remain in residence on probationary status. During the period of probation, if the student is found responsible for additional violations, the student may be evicted from on-campus housing.
  - Conduct Probation. Action permitting the student to remain at the University on probationary status. During the period of probation, if the student is found responsible for further violations, the student may be subject to suspension, dismissal, or separation from the University.
  - o Housing Relocation. Serious housing matters or repeated violations of University policy may result in relocation from one housing area to another.
  - o Housing Eviction. Serious housing matters or repeated violations of University policy may result in removal from University housing.
  - Suspension. A forced, temporary leave from the University. The time period of a suspension is typically a semester or a full academic year, but can be set for any duration by the Conduct Officer or Student Conduct Board.
  - Separation. Immediate and permanent separation from the University. A student who is separated from the University is not eligible for readmission, and is typically barred from University events, activities, and property.
- B. List of Additional Sanctions. A Student Conduct Board may also impose additional sanctions to the disciplinary sanctions listed in VIII (A). Additional sanctions include, but are not limited to, the following:
  - o Community Service. An assignment to perform a task or service for the University or a University sponsored organization.

- o Fine/Restitution. Reimbursement for damage to, destruction of, or misappropriation of property, to include but not limited to personal and medical reimbursement. 41
- Revocation of Privilege. Including, but not limited to, registered events, using University dining facilities, having an automobile on campus, and/or access to other University facilities. In serious matters, a student may have additional privileges revoked during and/or while University charges are being processed through the University conduct system.
- o Notification of parents/guardians if deemed appropriate.
- No Contact. An order to have no contact in any form with an identified student or students.
- C. Multiple Sanctions. More than one of the sanctions listed above may be imposed for any single violation.

Describes the range of protective measures that the institution may offer to the victim following an allegation of dating violence, domestic violence, sexual assault or stalking?

All members of the University community are encouraged to report sexual misconduct that may constitute a crime to the University Police Department. A Complainant may speak with a University Police detective before deciding whether to file a police report. A detective will meet with a Complainant, along with an advisor of their choosing and/or a victim advocate, to explain the criminal justice process, discuss options to protect the safety of the Complainant, including the option of seeking a Protective Order, and provide information on the importance of preserving evidence, including clothing and electronic communications.

If the identity of the Complainant can be determined from the report or initial fact-finding, the Title IX Coordinator will contact the Complainant and provide the Complainant with a summary of their rights under this Policy and related University policies such as the Standards of Student Conduct, information about available support resources, interim remedial measures, and reporting to law enforcement.

The Title IX Coordinator shall also offer to meet with the Complainant. The Complainant has the right to select an advisor of their choice and may have the advisor present during all meetings with the Title IX Coordinator.

When the Title IX Coordinator meets with the Complainant, the Coordinator provides the following information:

- The Complainant's Title IX rights and rights under this policy and related University policies, including the Standards of Student Conduct;
- The University's obligation to treat both the Complainant and the Respondent fairly;
- The University's obligation to investigate promptly the reported sexual misconduct;
- The Complainant's reporting rights, including the right to pursue or not to pursue criminal action including options for investigation and prosecution in addition to the University of Richmond's sexual misconduct and student conduct process;
- The importance of the collection and preservation of evidence:
- The importance of seeking appropriate medical attention;

- The available options for a protective order;
- The Complainant's right to participate or decline to participate in any investigation;
- The Complainant's right to an advisor of their choosing;
- Resources on campus and within the Richmond community, including counseling services, sexual assault crisis centers, and domestic violence crisis centers;
- Information about the investigation process and University procedures for pursuing a formal complaint against a student, faculty member, staff member, or third party, including the University's protections from retaliation.

## Include a prompt, fair and impartial process from the initial investigation to the final result?

The University shall complete the investigative and disciplinary process in a prompt manner designed to provide all parties with a reasonably timely resolution. However, the time frame for completion of a specific matter may vary depending upon a number of factors, including, but not limited to, the complexity of the case or investigation, the availability of witnesses, and the academic calendar.

Be conducted by officials who, at a minimum, receive annual training on the issues related to dating violence, domestic violence, sexual assault and stalking and on how to conduct an investigation and hearing process that protects the safety of the victims and promotes accountability?

Procedures Specific to the University Hearing Board in Matters Involving the University's Policy Prohibiting Sexual Misconduct. The University Hearing Board is charged with the disposition of charges as outlined in Article IV (C)(2)(a)(ii)(b) and Article IV (C)(2)(b)(ii) of the Standards of Student Conduct. The Vice President for Student Development shall assign a Hearing Officer to be responsible for the administration of the University Hearing Board.

- Composition of the University Hearing Board. The University Hearing Board shall consist of the three (3) voting members chosen from the University Hearing Board Pool.
  - o The University Hearing Board Pool shall consist of a minimum of ten (10) staff/administrators appointed annually by the University President and who have received training on issues related to sexual misconduct, Title IX, the impact of trauma on victims, the investigative and disciplinary process, and the hearing process.
  - Any member of the University Hearing Board Pool selected to serve on a University Hearing Board must disqualify themselves for any bias or conflict of interest.

Provide the accuser and the accused 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?

Attendance at the Hearing. The Respondent and their advisor have the right to attend the entire University Hearing Board hearing except for the deliberations of the University Hearing Board and the verbal notification of the outcome by the Hearing Officer to the Complainant.

Attendance at the Hearing. The Complainant and their advisor have the right to attend the entire University Hearing Board hearing, except for the deliberations of the University Hearing Board and the verbal notification of the outcome of the hearing by the Hearing Officer to the Respondent.

# Not limit the choice of advisor or presence for either the accuser or the accused in any meeting or institutional disciplinary proceeding?

Advisors. The Respondent has the right to the services of an advisor of their choice. The advisor may be an attorney.

- Advisors may attend the preliminary hearing and any other related meeting, hearing, or investigative interview with the Respondent once the conduct process has commenced. 20
- The role of the advisor is to provide support, guidance, and advice to the Respondent. The Respondent is responsible for presenting their own information, and therefore, other than providing advice and guidance directly to the Respondent, advisors are not permitted to participate in the preliminary hearing, other related meetings or interviews, or in any hearing before a University Hearing Board, including, but not limited to making oral arguments or statements, questioning witnesses, or raising objections during a hearing. An advisor may request a brief recess of the proceedings to provide advice to the Respondent.
- The Respondent should select as an advisor a person whose schedule allows attendance at the scheduled date and time for the University Hearing Board hearing, as delays will not normally be allowed due to the scheduling conflicts of an advisor

Advisors. The Complainant has the right to the services of an advisor of their choice. The advisor may be an attorney.

- Advisors may attend all meetings, hearings, or investigative interviews with the Complainant relating to the pending disciplinary charge, once the disciplinary process has commenced.
- The role of the advisor is to provide support, guidance, and advice to the Complainant. The Complainant is responsible for presenting their own information, and therefore, other than providing advice and guidance directly to the Complainant, advisors are not permitted to participate in the related meetings or interviews, or in any hearing before a Student Conduct Board, including, but not limited to making oral arguments or statements, questioning witnesses, or raising objections during a hearing. An advisor may request a brief recess of the proceedings to provide advice to the Complainant.
- The Complainant should select as an advisor a person whose schedule allows attendance at the scheduled date and time for the Student Conduct Board hearing, as delays will not normally be allowed due to the scheduling conflicts of an advisor

The result of any institutional disciplinary proceeding that arises from an allegation of dating violence, domestic violence, sexual assault or Stalking.

Notice of Outcome. The Complainant has the right to written notice of the outcome and sanctions (if applicable) of the University Hearing Board hearing that directly relate to the Complainant, including a brief summary of the rationale for such outcome and sanctions (if any), by 5:00 PM on the second business day following the conclusion of the hearing. The Hearing Officer of the board at their discretion can extend this timeline upon written notice to the Complainant setting for the reason for the extension. This notice shall include a brief description of the appeal rights of the Complainant under these Standards of Student Conduct. The Complainant also has the right to written notice of any change in the outcome or sanctions imposed and notice as to when such outcome and sanctions shall be deemed final. The notice(s) described in this Section 14 shall be sent simultaneously to the Complainant and the Respondent.

Notice of Outcome. The Respondent has the right to written notice of the outcome and sanctions (if applicable) of the University Hearing Board hearing, including a brief summary of the rationale for such outcome and sanctions (if any), by 5:00 PM on the second business day following the conclusion of the hearing. The Hearing Officer, at their discretion can extend this timeline upon written notice to the Respondent setting forth the reason for the extension. This notice shall include a brief description of the appeal rights of the Respondent under these Standards of Student Conduct. The Respondent also has the right to written notice of any change in the outcome or sanctions imposed and notice as to when such outcome and sanctions shall be deemed final. The notice(s) described in this Section 14 shall be sent simultaneously to the Respondent and the Complainant.

# The institution's procedures for the accused and the victim to appeal the result of the institutional disciplinary proceeding, if such procedures are available.

Appeal. The Complainant has the right to appeal the decision of the University Hearing Board, in accordance with the standards for appeal established in Article IX of the Standards of Student Conduct.

Appeal. The Respondent has the right to appeal the decision of the Student Conduct Board, in accordance with the standards for appeal established in Article IX of the Standards of Student Conduct

### Any change to the result?

The Complainant also has the right to written notice of any change in the outcome or sanctions imposed and notice as to when such outcome and sanctions shall be deemed final.

The Respondent also has the right to written notice of any change in the outcome or sanctions imposed and notice as to when such outcome and sanctions shall be deemed final.

#### When such results become final?

The Complainant also has the right to written notice of any change in the outcome or sanctions imposed and notice as to when such outcome and sanctions shall be deemed final.

The Respondent also has the right to written notice of any change in the outcome or sanctions imposed and notice as to when such outcome and sanctions shall be deemed final.

A statement that, when a student or employee reports to the institution that the student or employee has been a victim of dating violence, domestic violence, sexual assault or stalking, whether the offense occurred on or off campus, the institution will provide the student or employee a written explanation of the student's or employee's rights and options?

Outreach to the Complainant If the identity of the Complainant can be determined from the report or initial fact-finding, the Title IX Coordinator will contact the Complainant and provide the Complainant with a summary of their rights under this Policy and related University policies such as the Standards of Student Conduct, information about available support resources, interim remedial measures, and reporting to law enforcement. The Title IX Coordinator shall also offer to meet with the Complainant. The Complainant has the right to select an advisor of their choice and may have the advisor present during all meetings with the Title IX Coordinator.

Have you provided a statement advising the campus community where law enforcement agency information provided by a state concerning registered sex offenders may be obtained, such as the law enforcement agency with jurisdiction for the campus or a computer network address?

In accordance with the Jacob Wetterling Crimes Against Children and Sexually Violent Offender Registration Act, the Virginia State Police will advise the University of Richmond Police Department if a registered sex offender is employed, carries a vocation, or is a student at the University of Richmond. This information is also available at the <u>Virginia State Police Sex Offender registry</u>.

## X. Report to the Department of Education

URPD submits crime statistics from the annual security report to the Department of Education via an annual web-based data collection. Additionally, URPD submits fire statistics from the annual fire safety report due to UR's on-campus residential facilities.

### **XI.** Missing Student Notification Procedures

Anytime a member of the University community has reason to believe that a student who resides in on-campus housing is missing, he or she should immediately notify URPD at (804) 289-8715. URPD will immediately initiate an investigation and notify local law enforcement agencies, regardless of whether the student has identified a contact person, is above the age of 18, or is an emancipated minor.

If the missing student is under the age of 18 and is not an emancipated minor, URPD will notify the student's parent or legal guardian and any other designated contact within 24 hours after the University of Richmond Police Department has conducted an initial investigation and has determined that the student is missing.

If the missing student is age 18 or over, the University of Richmond Police Department will notify the student's designated confidential contact, if any, or the student's parent or legal guardian within 24 hours after the University of Richmond Police Department has conducted an initial investigation and has determined that the student is missing.

At any time the preliminary investigation indicates a need, the local law enforcement agencies and parents may be notified immediately.

In addition to registering an emergency contact, students residing in on-campus housing have the option to confidentially identify an individual to be contacted by URPD in the event the student is determined to be missing for more than 24 hours. If a student has identified such an individual, URPD will notify that individual no later than 24 hours after the student is determined to be missing. Students who wish to identify a confidential contact can do so through the University of Richmond Banner Web website at <a href="mailto:bannerweb.richmond.edu">bannerweb.richmond.edu</a>.

Confidential contact information remains confidential and will only be accessible to authorized campus officials and law enforcement and it may not be disclosed outside of a missing person investigation.

# XII. Fire Safety Log

The fire log is maintained by the Department of Environmental Health and Safety. The log is available for public inspection at URPD.

Police Report	Report Date	Incident Date/ Time	Nature of Fire	Location	Number of Deaths	Number of Injuries	Value Property Damaged
2015- 002539	6-25- 2015	06-25- 2015 03:34 hours	Cooking: The occupant reported that he and his roommates were cooking on the stove when some oil or grease on the burner ignited.	University Forest Apartment 1801	None	None	None
2016- 000327	1-23- 2016	01-23- 2016 17:14 hours	Cooking: The responsible occupant advised that he was preheating the oven in the basement and stepped out for "two minutes at most" to put down his jacket, and when he returned the oven was on fire. He stated that it appeared as if there had been plastic bowls or some other items stored inside the oven prior to his using it.	Freeman Hall Limited Access Kitchen	None	None	\$2,660.27
2017- 003163	9-17- 2017	09-17- 2017 7:37 PM	Cooking: The responsible occupant advised that they were warming taco shells in the oven at 350 degree by hanging them on the internal	University Forest Apartment 2107	None	None	\$30.00

			rack. After 3 minutes, the inside of the oven was fully engulfed with flame. The kitchen fire extinguisher was used.				
2017- 003495	10-17- 2017	10-17- 2017 14:05 hours	Cooking: Resident was cooking asparagus in the oven. The asparagus caught fire and it was put out with a fire extinguisher.	University Forest Apartment 2007	None	None	None

## **Annual Fire Safety Report**

## **Safety Education and Training**

All first year students receive fire safety indoctrination during the orientation process. All Residence Life staff receives annual fire safety training. Environmental Health makes available a fire safety program for use in the residence halls. The program includes:

- Fire Safety Policy
- Cover the policy, especially the high points and most frequent violations.
- Discuss the reasons for certain portions of the policy that may not be easily understood, i.e. why we minimize posting and decorative materials.
- Fire Evacuation Procedures
- Discuss the nature of fire.
- Discuss evacuation plans and how to respond to smoke or fire in an exit pathway.
- Fire Survival Procedures
- Discuss what needs to be done if escape from a room or the building is not an option.
- Fire Extinguisher Use
- Explain our policy pertaining to fire extinguisher usage.
- Discuss the necessary conditions which need to be in place prior to fighting a fire, i.e. exit to users back, fire in the insipient stages...
- Discuss how to operate a fire extinguisher.
- Conduct live fire training.
- O and A
- Discuss any questions that may come up.
- Residence hall room fire safety inspections are conducted and utilized to help increase awareness of, and compliance with fire safety regulations.

### **Fire Drills**

Each residence hall conducts four fire drills during a calendar year. Residence Life staff are trained prior to the beginning of each year to facilitate and critique fire drills. During 2017, the University of Richmond conducted 86 fire drills. The goal is to ensure safe evacuation in the event of a fire emergency through remembering the following:

- People who may be in danger act in a calm manner.
- Those people who have responsibilities carry out their tasks.
- Occupants evacuate by the nearest available exit
- Evacuation of the building is achieved in a speedy and orderly manner.

An evacuation report is filled out by the residence life staff member in charge. Following the evacuation, the Head Resident will meet briefly with the student staff at a predetermined location to process the evacuation and provide the information necessary to complete the Fire Alarm Evacuation Report. This report must be completed by the Head Resident (or another staff member in case of unscheduled alarms) and all reports are sent to Environmental Health and Safety.

# **Plans for Improving Fire Safety**

In conjunction with housing redevelopment projects North Court residential housing has been fully sprinkled during a recent renovation. And, South Court residential housing is closed and under renovation to add addressable smoke detectors.

## **Residence Hall Policies**

- Smoking is prohibited to include e-cigarettes.
- Open flames are prohibited on campus, including in residence halls, without prior approval.
- Candles, Incense, Flame Producing Products are prohibited.
- The following items are prohibited in all residential facilities
  - Space heaters
  - Hot plates
  - o Toaster ovens (not permitted in residence halls)
  - o Grilling machines **of any form** (not permitted in residence halls)
  - o All open/visible coil electrical equipment of any type
- University policy prohibits cooking in residence halls. The only exception to this rule is locked, limited access kitchens. Food preparation is allowed using only a Microwave oven
- Complete residence hall room fire safety inspections are conducted by staff from the Richmond and Westhampton Colleges, Environmental Health and Safety, and Risk Management two times per year.

### **Reporting a Fire Emergency**

All fire emergencies are to be reported to the URPD. You can reach URPD by using an ERTS phone, calling 911 from any building phone, or (804) 289-8911 if using a cell phone. Make sure you place your call from a safe location outside the building. Provide emergency personnel with specific information including your name, location of the incident, and nature of the emergency. If you observe signs of a previous fire you suspect may have not been reported, contact the central station non-emergency number at (804) 289-8715.

### **Procedures for Fire Emergencies**

- Fire Alarm System not Activated
  - o If you discover or suspect a fire immediately evacuate the building using the nearest available exit. **Do not attempt to fight a fire unless you have been trained to do so.** Sound the building fire alarm by activating the nearest pull station and or verbally sounding the alarm and knocking on doors as you evacuate the building by the nearest exit.
  - Notify emergency personnel by pushing the red button on an ERT's phone, dial 911 from any campus emergency phone, or if using a cell phone (804)289-8911 and inform authorities of your situation and location.
- Fire Alarm System is Activated
  - o If you hear the fire alarm immediately evacuate the building using the nearest available exit
- Do not attempt to fight a fire unless you have been trained to do so.
  - Awaken any sleeping roommate or suitemates. Prepare to evacuate by putting on shoes and coat if necessary. Feel the doorknob and the door. If they are hot, do not open the door. If they are cool, open slowly, if heat or heavy smoke rushes in, close the door immediately and remain inside. (See Shelter In Place)
  - o When leaving your room, be sure to take your key, *or your One Card* in case it is necessary to return to the room should conditions in the corridor deteriorate. Make sure to close the door tightly when evacuating.
  - o Resident life staff members who are present on their floors shall facilitate the evacuation of their floor/section if possible. When the alarm sounds shout (Example: there is an emergency in the building leave by the nearest exit) and knock on doors as they make their way to the nearest exit and out the building.
  - When exiting in smoky conditions keep your hand on the wall and crawl to the nearest exit. Always know more than one path out of your location and the number of doors between your room and the exit.
  - DO NOT USE ELEVATORS. Elevator shafts may fill with smoke or the power may fail, leaving you trapped. Elevators have features that recall and deactivate the elevator during an alarm. Standing and waiting for an elevator wastes valuable time.
  - Each resident shall report to their assigned assembly area. Resident life staff shall report to their assigned assembly area and make sure that students have cleared the building. Conduct a head count and do not allow re-entry into the building until directed to do so by emergency personnel.
  - The Head Resident will meet emergency responders (University of Richmond Police) outside their building to provide information, i.e. persons still in building, as needed. If an

- officer is not already on site dial 911 from any campus emergency phone or if using a cell phone (804)289-8911 and inform authorities of your situation and location.
- o Following the evacuation and receiving the all clear, the Head Resident will meet briefly with the student staff at a predetermined location to process the evacuation and provide the information necessary to complete the Fire Alarm Evacuation Report. This report must be completed by the Head Resident (or another staff member) and submitted to the Residence Life Administrative Assistant within 24 hours of the evacuation.

#### • Shelter In Place

- o If for any reason you are not able to leave your room, dial 911 or on cell phone (804)289- 8911 and inform authorities of your location.
- Make sure the door to your room is tightly closed and use a bed sheet or blanket to fill the cracks around the door.
- o If possible, open the window two-thirds at the top to allow hot air and gases to escape—and one-third at the bottom. Keeping your face near the bottom opening will allow you to breathe fresh air while waiting for help to arrive. Never break the window. If you do, you will no longer have the ability to control the influx of smoke from other floors.
- Wave a towel or brightly colored shirt from the window, and yell for help this will aid rescuers in locating you. The Fire Department looks for this type of signal.

#### • If You are On Fire

o STOP, DROP AND ROLL. If your clothes catch on fire, Stop, Drop, and Roll, wherever you are. Rolling smothers the fire.

#### **Future Considerations**

In conjunction with the current housing redevelopment projects schedule, the existing smoke alarms installed in residence rooms will be upgraded to system smoke detectors for the rooms in Keller Hall, Marsh Hall and Moore Hall during the 2018-2019 school year. The projects schedule calls for the existing smoke alarms in Lora Robins Court to be replaced with system smoke detectors in 2020.

### Fire Safety Equipment in Residence Halls

Building and Address	Fire Alarm Type	Combustible Gas/C0 Detectors	Suppression System(s)	Total Fires
Atlantic House 332 College Road	Addressable system continuously monitored by a Central Station throughout common areas with single station smoke alarms detectors in each student room.	C0 only	(Wet System) building is fully sprinkled. Fire extinguishers in common areas and in each student room.	None

Dennis Hall 244 Richmond Way	Addressable system continuously monitored by a Central Station throughout common areas with single station smoke alarms detectors in each student room.	Yes	(Wet System) building is fully sprinkled. Fire extinguishers in each student room.	None
Freeman Hall 248 Richmond Way	Addressable system continuously monitored by a Central Station throughout the entire building to include each student room.	N/A	(Wet System) building is fully sprinkled. Kitchen Hood for limited access kitchen. Fire extinguishers in each Resident Life Staff member's room.	(1) 01/16
Gateway Village Apartment 55 157 UR Drive	Addressable system continuously monitored by a Central Station throughout the entire building to include each student room.	Yes	(Wet System) building is fully sprinkled. Fire extinguishers in common areas and each Resident Life Staff member's room.	
Gateway Village Apartment 56 153 UR Drive	Addressable system continuously monitored by a Central Station throughout the entire building to include each student room.	N/A	(Wet System) building is fully sprinkled. Fire extinguishers in common areas and each Resident Life Staff member's room.	None
Gateway Village Apartment 57 155 UR Drive	Addressable system continuously monitored by a Central Station throughout the entire building to include each student room.	N/A	(Wet System) building is fully sprinkled. Fire extinguishers in common areas and each Resident Life Staff member's room.	None
Gateway Village Apartment 58 151 UR Drive	Addressable system continuously monitored by a Central Station throughout the entire building to include each student room.	N/A	(Wet System) building is fully sprinkled. Fire extinguishers in common areas and each Resident Life Staff member's room.	None
Gray Court 416 Westhampton Way	Addressable system continuously monitored by a Central Station throughout the entire building to include each student room.	Yes	(Wet System) building is fully sprinkled. Fire extinguishers in each Resident Life Staff member room.	None

Jeter Hall 242 Richmond Way	Addressable system continuously monitored by a Central Station throughout the entire building to include each student room.	N/A	(Wet System) building is fully sprinkled. Fire extinguishers in each Resident Life Staff member room.	None
Keller Hall 451 Westhampton Way	Addressable system continuously monitored by a Central Station throughout common areas with single station smoke alarms detectors in each student room.	Yes	(Wet System) building is fully sprinkled. Fire extinguishers in each student room.	None
Lakeview Hall 256 Richmond Way	Addressable system continuously monitored by a Central Station throughout the entire building to include each student room.	Yes	(Wet System) building is fully sprinkled. Kitchen Hood for limited access kitchen. Fire extinguishers in each Resident Life Staff member room.	None
Law Dorm III 336 College Road	Addressable system continuously monitored by a Central Station throughout common areas with single station smoke alarms detectors in each student room.	C0 only	Building not sprinkled Fire extinguishers in each student room.	None
Lora Robins Court 403 Westhampton Way	Addressable system continuously monitored by a Central Station throughout common areas with single station smoke alarms detectors in each student room.	Yes	(Wet System) building is fully sprinkled. Fire extinguishers in each student room.	None
Marsh Hall 258 Richmond Way	Addressable system continuously monitored by a Central Station throughout common areas with single station smoke alarms detectors in each student room.	Yes	(Wet System) building is fully sprinkled. Fire extinguishers in each student room.	None
Moore Hall 250 Richmond Way	Addressable system continuously monitored by a Central Station throughout common areas with single station smoke alarms detectors in each student room.	Yes	(Wet System) building is fully sprinkled. Fire extinguishers in each student room.	None

North Court 421 Westhampton Way	Addressable system continuously monitored by a Central Station throughout the entire building to include each student room.	N/A	(Wet System) building is fully sprinkled. Fire extinguishers in each Resident Life Staff member room.	None
Pacific House 330 College Road	Addressable system continuously monitored by a Central Station throughout common areas with single station smoke alarms detectors in each student room.	C0 only	(Wet System) building is fully sprinkled. Fire extinguishers in common areas and in each student room.	None
Robins Hall 240 Richmond Way	Addressable system continuously monitored by a Central Station throughout common areas with single station smoke alarms detectors in each student room.	N/A	(Wet System) building is fully sprinkled. Fire extinguishers in each student room.	None
South Court 431 Westhampton Way	Addressable system continuously monitored by a Central Station throughout common areas with single station smoke alarms detectors in each student room.	Yes	(Wet System) building is fully sprinkled. Fire extinguishers in each student room.	None
Thomas Hall 252 Richmond Way	Addressable system continuously monitored by a Central Station throughout the entire building to include each student room.	N/A	(Wet System) building is fully sprinkled. Fire extinguishers in each Resident Life Staff member room.	None
Westhampton Hall 433 Westhampton Way	Addressable system continuously monitored by a Central Station throughout the entire building to include each student room.	Yes	(Wet System) building is fully sprinkled. Fire extinguishers in each Resident Life Staff member room.	None
Wood Hall 254 Richmond Way	Addressable system continuously monitored by a Central Station throughout common areas with single station smoke alarms in each student room.	Yes	(Wet System) building is fully sprinkled. Fire extinguishers in each student room.	None

University Forest Apartment Blocks 160, 162,164, 166, 168, 170, 172, 191, 193, 470, 472, 474, 476, 481, 483, and	Addressable system continuously monitored by a Central Station throughout common areas and residence rooms.	Yes	Fire extinguishers in common areas	(1) 6/15
486.				