



Holy Family

UNIVERSITY

Holy Family University

2023 Annual Security & Fire Safety Report

Northeast Philadelphia Campus

Newtown Campus

Statistics for 2020, 2021 & 2022

Department of Public Safety

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Your Right to Know

Holy Family University prides itself on maintaining a safe and secure environment for its students, faculty, staff, and visitors. The university has been fortunate in not experiencing a significant number of serious crimes in the past. To continue this trend, a competent and professionally-trained public safety staff is responsible for a number of University programs designed to ensure that students and their possessions are protected as much as possible.

Holy Family University's Public Safety Department is committed to high standards in quality and in promoting a safe and problem-free educational environment. Honesty, service, and integrity are the department's creed in the administration of community policies and procedures.

We encourage students, faculty and staff to be alert, to take precautions, and to report crimes and suspicious activities immediately to help us reach our objective. Working together, we can improve the quality of life at Holy Family University. The best way you can help us help you is by getting involved and learning what services are available through the Public Safety Department. This annual safety report is available online and/or upon request to the Director of Public Safety.

We welcome your suggestions and comments on how to make the campus an even safer environment. To share your ideas with the Public Safety Department, please call us at 267-341-3361, email us at PublicSafety@holyfamily.edu or visit us at www.holyfamily.edu/security-safety.

Remember, the Public Safety Department is here to serve you!!

Glenn Gates
Asst.V.P. for Public Safety & Risk Man.

Marianne Price, M.S.
Dean of Students & Title IX Coordinator

Compiling the Annual Security Report

This report is prepared in compliance with the Jeanne Clery Disclosure of Campus Security Policy and Crime Statistics Act. The report is compiled collaboratively by Glenn Gates, Asst. Vice President of Public Safety & Risk Management, and Marianne Price, Dean of Students & Title IX Coordinator, and with support of other University units and personnel. This report is prepared in cooperation with the local law enforcement agencies surrounding our main campus and each of our alternate sites, as well as the division of Student Affairs. Areas contributing to the development of this report include: Residence Life, Student Engagement, Counseling Services, Health Services, Dean of Students Office and Title IX. Each entity provides updated information on their educational efforts and programs specifically designed to comply with the Clery Act. The Office of Residence Life is also integral in the development of campus crimes and referrals, specifically related to residential students.

Campus crimes, arrests, and referral statistics include those reported to Holy Family University's Public Safety Department, designated campus officials, and local law enforcement agencies. Designated campus officials include, but are not limited to directors, academic deans, department heads, judicial hearing officers, advisors to University students, advisors to student organizations, athletic personnel and athletics coaching staff members.

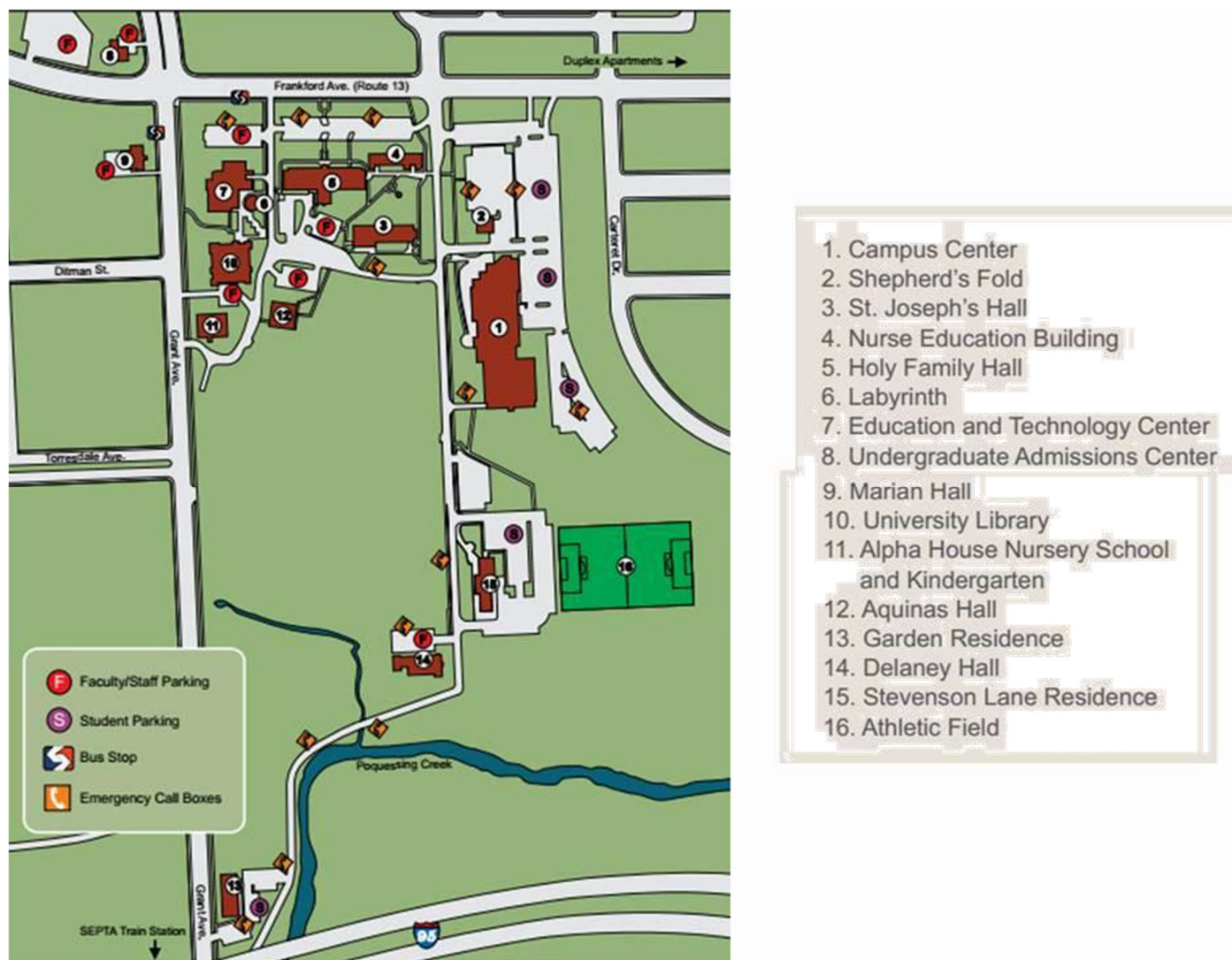
Each year, an e-mail notification is distributed to all currently enrolled students, full- and part-time faculty, and all staff members that provides information regarding how to access this report. Copies of the report may also be obtained from the Public Safety Office, located in the lobby of the Campus Center, located on the Philadelphia Main Campus, by calling 267-341-3361. All prospective students and employees may request to obtain a copy from Public Safety.

The full text of this report can be located on our website at:
<https://www.holyfamily.edu/about/administrative-services/campus-safety-security>.

Security Of and Access to Campus Facilities

Public Safety Officers

The Public Safety Department at Holy Family is maintained by Dole Security Services, and reports to the Office of the Vice President for Finance and Administration. The department's management team consists of an Asst. V.P. for Public Safety, a Director of Public Safety, and three Supervisors. Public Safety headquarters is located in the Campus Center at the Northeast campus (See building 1).



The uniformed arm of a Public Safety Department includes approximately 30 full- and part-time security officers who service the Holy Family community 24 hours a day, seven days a week. Public Safety officers follow and enforce the policies and procedures set by the University, as well as appropriate local, state, and federal laws.

Background investigations are conducted on all officers and include pre-employment criminal history checks, Department of Motor Vehicles' operator license validations, productivity profiles, education level verifications, and previous employment history checks.

All officers receive security-principles training and community-orientation training, which

includes field training prior to assignment. All officers receive cardiopulmonary resuscitation (CPR) and Automated External Defibrillation (AED) training and are required to complete a certification examination covering all aspects of security-principles training, orientation, and field training. The Public Safety Officer's knowledge is tested on such subjects as criminal law, campus and private security, patrol techniques, authority of arrest, defensive tactics, emergency safety procedures and crisis intervention.

Safety Policies and Procedures for Residence Halls

Holy Family University has co-educational residence halls. The University offers residences that accommodate single and double occupancy. There is no on-campus housing for married students. Security of residence halls and campus facilities outside of residence halls is accomplished through a variety of measures to include video monitoring and random patrols by Public Safety Officers.

Members of the university's Residence Life staff live in the residence halls, and are on call 24 hours a day. All residence life staff members receive training in enforcing residence hall security policies.

Residents are expected to cooperate fully with the Security Officer in the discharge of their respective duties.

Access to each residence hall is through the front entrance. All other doors are locked from the outside and are equipped with exit alarms or card access devices that record when the door is opened. These doors are to be used only in case of emergency. Public Safety Officers are responsible for controlling access to and egress from the building through the front doors as well as for checking students' University ID cards before admitting students into the building.

Public Safety officers also assist residents in registering guests. The resident is responsible for escorting guests at all times while they are in the residence hall and for explaining university housing rules and regulations to each guest.

Each resident is issued a key or ID that will open their room. If a key or ID is lost, a lock change is ordered. Also, a new key is issued.

Most University housing facilities are closed and locked during official vacation and break periods. During these times, residents are encouraged to take all valuables with them. Students who remain during these periods are given temporary residence in a designated residence hall, which will remain open and accessible during breaks.

University residence halls have fire safety features such as smoke detectors, alarmed fire exit doors, fire extinguishers and fire exit doors. Tampering with fire safety equipment, such as fire extinguishers, fire hoses, alarm pull stations, smoke detectors, heat sensors, or a sprinkler is prohibited. Making a false report, fire warning, or threat of fire by any means of communication is prohibited.

Public Safety officers are stationed inside the Stevenson Lane Residence and St. Joseph Hall, and surveillance cameras are in place at all residence halls that are monitored by Public Safety.

University Building Access

All university buildings and residences are the private property of Holy Family University and are posted as such. These buildings are opened at a designated time each morning and secured at a designated time each evening by assigned personnel. Any unauthorized person entering a University building is considered to be trespassing. After-hours access to University-owned or University-managed buildings is determined by the needs of each department. Once a building has been secured for the evening, only authorized individuals are permitted to enter.

Off-Campus Property

Holy Family University does not have any off-campus properties officially recognized by the University for usage by registered (official) student organizations or athletics teams.

Weapons on Campus

The presence and use of weapons on campus presents a potential threat to the safety of all community members. No student, staff member, faculty member or visitor shall keep, use, possess, display, or transport any rifles, shotguns, handguns, pellet or BB guns, dangerous knives, billy clubs, makeshift weapons, martial arts weapons, or any other lethal or dangerous devices capable of casting a projectile by air, gas, explosion, or mechanical means on any property or in any building owned or operated by the university or in any vehicle on campus. Realistic facsimiles of weapons are also specifically not allowed.

If attending classes on campus, Law Enforcement individuals must conceal their weapons. The university retains the right to search persons, possessions and bags, and privately-owned vehicles on university property, and to confiscate, retain and dispose of/destroy all items covered by this policy regardless of value or ownership. Law enforcement may be contacted for some violations of this policy.

Law Enforcement & Jurisdiction

Holy Family Public Safety Officers have the authority to ask persons for identification and to determine whether individuals have lawful business at Holy Family University Northeast and Newtown Campuses. They also have the authority to issue parking tickets, which are billed to financial accounts of students, faculty, and staff on these campuses. Public Safety Officers do not have arrest power.

Criminal incidents are referred to the local police who have jurisdiction on the campus. The local police jurisdictions, with whom Holy Family Public Safety Department maintains a close working relationship with, are:

- the Philadelphia Police Department for the Northeast campus;
- the Newtown Township Police Department for the Newtown site;
- as well as state and federal agencies.

The department works closely with the investigative staff of these police departments when incidents arise that require joint investigative efforts, resources, crime-related reports and exchanges of information as deemed necessary. There is no written memorandum of understanding between the university's Public Safety Department and the Philadelphia or Newtown Township Police Department.

The University learns of information regarding our campus, campus community, and students via local police through ongoing and regular contact maintained by the Director of Public Safety and the named police agencies.

All crime victims, witnesses, and any other person aware of a crime are strongly encouraged to immediately report the crime to the Director of Public Safety and/or the appropriate police department promptly if the situation warrants. Prompt reporting will assure timely warning notices on campus and timely disclosure of crime statistics. Currently, there is no policy in place for the reporting of a crime on a confidential basis through Public Safety.

Holy Family University does currently have the option for students, faculty, staff, community members, and third parties to file an anonymous report that are violations of the University Sexual Harassment & Nondiscrimination Policy. See <https://holyfamily-pa.safecollegesincident.com/#/login>.

Because Holy Family University does not have any properties officially recognized by the University for usage by official student organizations or athletics teams, Public Safety does not require the monitoring of local police agencies of any off-campus property.

Reporting Crimes and Other Emergencies

Reporting Incidents

All serious incidents, commonly referred to as Part 1 crimes, including murder, rape, robbery, assault, burglary, auto theft, and arson are reported to:

- Philadelphia Police Department for the Northeast campus; and
- Newtown Township Department for the Newtown site.

Additionally, these police departments will provide the Holy Family Public Safety Department with a report of incidents that have been reported to them for the neighborhoods surrounding the campus. Holy Family promptly reports these incidents to the various police departments as previously noted. Known and reported crimes against people, off and on campus, are posted on Holy Family University's security website and are available for review on a daily basis.

In addition, when circumstances warrant, the University will employ e-mail, text messaging, voicemail, the Holy Family website, Tiger Alert and other forms of Security Alerts to provide timely notice of criminal activities on and around campus. Should incidents occur that are beyond the capability of the University's Public Safety Department, the City of Philadelphia or Newtown Township Police Department will respond and assist in the proper handling of the incident. Attempts to receive crime statistics, from the jurisdiction for the respective police departments listed above, have been made by Holy Family University's Asst. V.P. for Public Safety or designee.

All incidents should be reported promptly to Holy Family's Public Safety Department. For each incident reported, an investigation is conducted and a file is created. If the situation warrants, local police are contacted for assistance. Any student or employee who observes an incident such as theft, substance abuse, assault or suspicious behavior, should report the activity to the Public Safety Department at Extension 3333 from a phone on any campus or 267-341-3333 from a non-campus phone.

Holy Family University encourages accurate and prompt reporting of all crimes to the campus Public Safety department and appropriate police agencies when the victim elects to or is unable to make such a report.

Students and employees should take the following steps in an emergency:

- Report the incident by calling 9-1-1 and to Holy Family's Public Safety Department by calling extension 3333 from any campus phone, 267-341-3333 from a non-campus phone, or by using the nearest emergency call box which are located throughout each campus. The emergency call boxes dial directly to the Public Safety Department.
- Communicate as much information about the incident as possible (i.e., location, type of incident, and description of those involved).

Campus Security Authorities

Although Public Safety encourages the reporting of crime directly to them, members of the campus community may choose to file a report in some instances with one of the other Campus Security Authorities. They include, but are not limited to:

- Vice President for Student Life
- Vice President for Academic Affairs
- Dean of Students

- Associate Vice President for Human Resources
- Associate Vice President for Student Life
- Academic Deans
- Director of Equity & Inclusion/Deputy Title IX Coordinator
- Director of Career Development
- Coordinator of Experiential Learning
- Career Development Coordinator
- Director of Counseling Services
- Staff Counselor
- Director of Health Services
- Registered Nurse, Medical Assistant
- Director of Residence Life
- Director of Student Success
- Director of Student Engagement
- Student Engagement Coordinator
- Residence Life Coordinator
- Director of Special Events, University Advancement
- Associate Director of Disabilities Services
- Title IX Coordinator
- Director, Campus Ministry
- Administrative Assistant, Student Affairs Division
- AVP, Public Safety
- Director, Public Safety
- Assistant Vice President for Development
- Community Assistants
- Athletic Director
- University Athletic Administrators, University Athletic Trainers, University Coaching Staff Members, full-time and volunteer
- Faculty and Staff members serving as advisors to Registered Student Organizations

Voluntary Confidential Reporting

Public Safety and Campus Security Authorities do not have confidential reporting. Campus Pastoral Counselors and Campus Professional Counselors, when acting as such, are not considered to be Campus Security Authorities, and are not required to report crimes for inclusion into the annual disclosure of crime statistics. As a matter of policy, they are encouraged, if and when they deem it appropriate, to inform persons being counseled of the procedures to report crimes on a voluntary basis for inclusion into the annual crime statistics.

The university defines these counselors as:

Pastoral Counselor

An employee of an institution, who is associated with a religious order or denomination, recognized by that religious order or denomination as someone who provides confidential counseling, and who is functioning within the scope of that recognition as a pastoral counselor.

Professional Counselor

An employee of an institution who has official responsibilities inclusive of providing psychological counseling to members of the institution's community, and who is functioning within the scope of his or her license or certification.

The campus community receives annual communication from the Clery Compliance Coordinator regarding where confidential reporting options are available on-campus, and how to speak to confidential resources. The names and locations of these individuals are provided to all enrolled students. Annual training of Campus Security Authorities includes this information as well.

Crime Statistics

As required by the College and University Security Act of 1988 and the Student Right-to-Know and Campus Security Act of 1990, revised in October 1999, the university annually reports to its students and employees, both current and prospective, the incidence of crime on campus, the university's security procedures and policies, and the necessary steps to enhance its public safety.

If a person believes there has been a violation of one or more of the provisions of the Pennsylvania College and University Security Information Act, a person may file a complaint with the Public Safety Department. The complaint will be forwarded to the Director of Public Safety, who will respond. If a person still feels that a violation has been committed, they may appeal to the Vice President for Student Affairs, or their designee, who has the ultimate responsibility to receive and resolve such complaints. Information is available at: <https://www.holyfamily.edu/about/administrative-services/campus-safety-security> or by calling Extension 3333 from a phone on any campus or 267-341-3333 from a non-campus phone.

Below is the chart of the crime statistics on campus for the period notated as required by Pennsylvania Act 73, the College and University Security Information Act. The Clery Act, as amended, requires separate statistics for specified criminal incidents, arrests and disciplinary referrals for certain non-contiguous properties. There were no crimes reported in any of the required categories at this location. Holy Family University also has no non-campus locations used by a recognized student organization to record criminal activities.

The following statistics include reportable crime at non-contiguous properties specified for inclusion in this report from the period January 1, 2020 through December 31, 2022. These statistics conform to the specific definitions, time period, and classifications specified by federal law.

PHILADELPHIA CAMPUS-CRIMINAL OFFENSES

OFFENSE	YEAR	GEOGRAPHIC LOCATION				
		TOTAL	ON-CAMPUS PROPERTY	ON-CAMPUS STUDENT HOUSING FACILITIES	NON-CAMPUS PROPERTY	PUBLIC PROPERTY
MURDER NON-NEGLEGT MANSLAUGHTER	2020	0	0	0	0	0
	2021	0	0	0	0	0
	2022	0	0	0	0	0
MANSLAUGHTER	2020	0	0	0	0	0
	2021	0	0	0	0	0
	2022	0	0	0	0	0
RAPE	2020	0	0	0	0	0
	2021	0	0	0	0	0
	2022	1	1	0	0	0
FONDLING	2020	0	0	0	0	0
	2021	0	0	0	0	0
	2022	0	0	0	0	0
INCEST	2020	0	0	0	0	0
	2021	0	0	0	0	0
	2022	0	0	0	0	0
STATUTORY RAPE	2020	0	0	0	0	0
	2021	0	0	0	0	0
	2022	0	0	0	0	0
ROBBERY	2020	0	0	0	0	0
	2021	0	0	0	0	0
	2022	0	0	0	0	0
AGGRAVATED ASSAULT	2020	0	0	0	0	0
	2021	0	0	0	0	0
	2022	0	0	0	0	0
BURGLARY	2020	0	0	0	0	0
	2021	1	1	1	0	0
	2022	0	0	0	0	0
MOTOR VEHICLE THEFT	2020	0	0	0	0	0
	2021	0	0	0	0	0
	2022	0	0	0	0	0
ARSON	2020	0	0	0	0	0
	2021	0	0	0	0	0
	2022	0	0	0	0	0
PHILADELPHIA CAMPUS-ARRESTS & DISCIPLINARY REFERRALS						
ARRESTS- WEAPONS LAW VIOLATIONS	2020	0	0	0	0	0
	2021	0	0	0	0	0
	2022	0	0	0	0	0
REFERRALS- WEAPONS LAW VIOLATIONS	2020	0	0	0	0	0
	2021	0	0	0	0	0
	2022	0	0	0	0	0
ARRESTS- DRUG LAW	2020	0	0	0	0	0
	2021	0	0	0	0	0

VIOLETIONS	2022	0	0	0	0	0
REFERRALS- DRUG LAW VIOLETIONS	2020	8	8	8	0	0
	2021	4	4	4	0	0
	2022	4	4	4	0	0
ARRESTS- LIQUOR LAW VIOLETIONS	2020	0	0	0	0	0
	2021	0	0	0	0	0
	2022	0	0	0	0	0
REFERRALS- LIQUOR LAW VIOLETIONS	2020	8	8	8	0	0
	2021	8	8	6	0	0
	2022	0	0	0	0	0
PHILADELPHIA CAMPUS-VAWA OFFENSES						
DOMESTIC VIOLENCE	2020	2	2	2	0	0
	2021	0	0	0	0	0
	2022	0	0	0	0	0
DATING VIOLENCE	2020	0	0	0	0	0
	2021	0	0	0	0	0
	2022	0	0	0	0	0
STALKING	2020	1	1	0	0	0
	2021	1	1	0	0	0
	2022	1	1	0	0	0

NEWTOWN CAMPUS-CRIMINAL OFFENSES

OFFENSE	YEAR	GEOGRAPHIC LOCATION				
		TOTAL	ON-CAMPUS PROPERTY	ON-CAMPUS STUDENT HOUSING FACILITIES	NON-CAMPUS PROPERTY	PUBLIC PROPERTY
MURDER NON-NEGLEGT MANSLAUGHTER	2020	0	0	0	0	0
	2021	0	0	0	0	0
	2022	0	0	0	0	0
MANSLAUGHTER	2020	0	0	0	0	0
	2021	0	0	0	0	0
	2022	0	0	0	0	0
RAPE	2020	0	0	0	0	0
	2021	0	0	0	0	0
	2022	0	0	0	0	0
FONDLING	2020	0	0	0	0	0
	2021	0	0	0	0	0
	2022	0	0	0	0	0
INCEST	2020	0	0	0	0	0
	2021	0	0	0	0	0
	2022	0	0	0	0	0
STATUTORY RAPE	2020	0	0	0	0	0
	2021	0	0	0	0	0
	2022	0	0	0	0	0
ROBBERY	2020	0	0	0	0	0
	2021	0	0	0	0	0
	2022	0	0	0	0	0
AGGRAVATED ASSAULT	2020	0	0	0	0	0
	2021	0	0	0	0	0
	2022	0	0	0	0	0
BURGLARY	2020	0	0	0	0	0
	2021	0	0	0	0	0
	2022	0	0	0	0	0
MOTOR VEHICLE THEFT	2020	0	0	0	0	0
	2021	0	0	0	0	0
	2022	0	0	0	0	0
ARSON	2020	0	0	0	0	0
	2021	0	0	0	0	0
	2022	0	0	0	0	0

NEWTOWN CAMPUS-ARRESTS & DISCIPLINARY REFERRALS

ARRESTS- WEAPONS LAW VIOLATIONS	2020	0	0	0	0	0
	2021	0	0	0	0	0
	2022	0	0	0	0	0
REFERRALS- WEAPONS LAW VIOLATIONS	2020	0	0	0	0	0
	2021	0	0	0	0	0
	2022	0	0	0	0	0
ARRESTS- DRUG LAW VIOLATIONS	2020	0	0	0	0	0
	2021	0	0	0	0	0
	2022	0	0	0	0	0
REFERRALS-	2020	0	0	0	0	0

DRUG LAW VIOLATIONS	2021	0	0	0	0	0
	2022	0	0	0	0	0
ARRESTS-LIQUOR LAW VIOLATIONS	2020	0	0	0	0	0
	2021	0	0	0	0	0
REFERRALS-LIQUOR LAW VIOLATIONS	2020	0	0	0	0	0
	2021	0	0	0	0	0
	2022	0	0	0	0	0
	NEWTOWN CAMPUS-VAWA OFFENSES					
DOMESTIC VIOLENCE	2020	0	0	0	0	0
	2021	0	0	0	0	0
	2022	0	0	0	0	0
DATING VIOLENCE	2020	0	0	0	0	0
	2021	0	0	0	0	0
	2022	0	0	0	0	0
STALKING	2020	0	0	0	0	0
	2021	0	0	0	0	0
	2022	0	0	0	0	0

Criminal Offenses

Murder/Non-Negligent Manslaughter: The willful (non-negligent) killing of one human being by another. Deaths caused by suicides, fetal deaths, traffic fatalities, accidental deaths, and justifiable homicides are excluded. Assaults with intent to murder and attempts to murder should be classified as aggravated assault.

Manslaughter by Negligence: The killing of another person through gross negligence.

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

Rape: The penetration, no matter how slight, of the vagina or anus with any body part or object, or oral penetration by a sex organ of another person, without consent of the victim.

Fondling: 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: Sexual intercourse between persons who are related to each other within the degrees wherein marriage is prohibited by law.

Statutory Rape: Sexual intercourse with a person who is under the statutory age of consent.

Robbery: The taking or attempting to take anything from value of 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: An unlawful attack by one person upon another for the purpose of inflicting severe or aggravated bodily injury. This type of assault usually is accompanied by the use of a weapon or by means likely to produce death or great bodily harm.

Burglary: The unlawful entry of a structure to commit a felony or a theft. For Clery reporting purposes this definition includes: unlawful entry with intent to commit a larceny or a felony; breaking and entering with intent to commit a larceny; housebreaking; safecracking; and all attempts to commit any of the aforementioned.

Motor Vehicle Theft: The theft or attempted theft of a motor vehicle by persons not having lawful access to the automobile.

Arson: Any willful or malicious burning or attempt to burn, with or without intent to defraud, a dwelling house, public building, motor vehicle or aircraft, or personal property of another kind.

Hate Crimes

A hate crime is a criminal offense that manifests evidence that the victim was intentionally selected because of the perpetrator's bias against the victim. Bias is a performed negative opinion or attitude towards a group of persons based on their race, gender, religion, disability, sexual orientation, ethnicity, national origin or gender identity. For Clery purposes, hate crimes include any of the above offenses and the addition of the categories below:

Larceny-Theft: The unlawful taking, carrying, leading, or riding away of property from the possession or constructive possession of another.

Simple Assault: The 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 lacerations, or loss of consciousness.

Intimidation: 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: To willfully or maliciously destroy, injure, disfigure, or deface any public or private property, real or personal, without the consent of the owner or person having custody or control by cutting, tearing, breaking, marking, painting, drawing, covering with filth, or any other such means as may be specified by local law.

VAWA Offenses

The Violence Against Women Reauthorization Act ("VAWA"), which President Obama signed into law on March 7, 2013 imposes new obligations on colleges and universities under its Campus Sexual Violence Act ("SaVE Act") provision, Section 304. Under this law the additional crime categories are collected:

Domestic Violence: includes misdemeanor and felony crimes of violence committed against a victim when the offender is the spouse of the victim, a former spouse of the victim, or an intimate partner of the victim, or has a child in common with the victim. Domestic violence also includes misdemeanor or felony crimes of violence when the victim is a minor subject to the control of the offender, or is an incapacitated individual subject to the control of the offender.

Dating Violence: violence committed by a person who is or has been in a social relationship of a romantic or intimate nature with the victim. 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 persons involved in the relationship. *Dating violence includes, but is not limited to, sexual or physical abuse or threat of such abuse* (Handbook for Campus Safety and Security Reporting, 2016).

Stalking: a course of conduct directed (two or more acts) at a specific person that would cause a reasonable person to fear for her, his, or others' safety, or to suffer substantial emotional distress. Note: the physical location of the course of conduct or portions of it does not matter.

"Course of conduct means two or more acts, including but not limited to, acts in which the stalker directly, indirectly, or through third parties, by any action, method, device, or means, follows, monitors, observes, surveils, threatens or communicates to or about a person, or interferes with a person's property" (Handbook for Campus Safety and Security Reporting, 2016).

Sexual Assault: this crime is included by the FBI as a Criminal Offense and is discussed above under the section titled "Criminal Offenses".

Violations of Weapons, Drug Abuse and Liquor Laws

The third category of crime statistics is the number of arrests and the number of referrals for disciplinary action for the categories listed below. In keeping with Ithaca College's [Student Code of Conduct](#), it is possible for a student to not be arrested but, in lieu of arrest, be referred for disciplinary action for one or more of the following offenses:

Weapon Law Violations: the violation of laws or ordinances dealing with weapon offenses, regulatory in nature, such as: manufacture, sale, or possession of deadly weapons; carrying deadly weapons, concealed or openly; furnishing deadly weapons to minors; aliens possessing deadly weapons; all attempts to commit any of the aforementioned.

Drug Abuse Violations: violations of state and local laws relating to the unlawful possession, sale, use, growing, manufacturing, and making of narcotic drugs. The relevant substances include: opium or cocaine and their derivatives (morphine, heroin, codeine); marijuana; synthetic narcotics; and dangerous non-narcotic drugs).

Liquor Law Violations: violations of laws or ordinance prohibiting the manufacture, sale, transporting, furnishing, possessing of intoxicating liquor; maintaining unlawful drinking places; bootlegging; operating a still; furnishing liquor to a minor or intemperate person; using a vehicle for illegal transportation of liquor; drinking on a train or public conveyance; all attempts to commit any of the aforementioned.

Timely Warnings & Emergency Notification and Evacuation

To ensure the security of Holy Family University, the university utilizes a Public Safety alert system. Dubbed “Tiger Alert”, the system utilizes university e-mail, text messaging, electronic signage, and will be used for timely warnings and emergency notifications affecting the Northeast and/or Newtown Campus. The system is not used to distribute advertising or any other unsolicited content. Subscribers pay no fees for the service, other than the regular fees associated with text-messaging services. Up to two cell phone numbers and one email address may be registered to one person. Registration by any member of the University or campus community may register at:

<https://www.holyfamily.edu/about/administrative-services/campus-safety-security>.

Timely Warnings

Timely Warnings are triggered by crimes that already occurred but represent an ongoing threat. In the event that a crime occurs on or near the Northeast or Newtown campus, or on designated non-campus property, that in the judgment of the Department of Public Safety, constitutes a serious or continuing threat to members of the University community, the department may issue a Timely Warning notice that withholds the names of the victims as confidential and that will aid in the prevention of similar occurrences.

Timely warnings will be issued for the following crimes if the crimes are reported to Campus Security Authorities (CSA) or the Philadelphia or Newtown Police Department and if they are considered by the University to represent a serious or continuing threat to students and employees and occur on or near the Northeast and Newtown Campuses:

- Murder and non-negligent manslaughter
- Negligent manslaughter
- Forcible and non-forcible sex offenses
- Robbery
- Aggravated assault
- Burglary
- Motor vehicle theft
- Arson

Any person with information warranting a timely warning should report the circumstances to the university’s Public Safety Department by phone at any campus by calling Extension 3333, or 267-341-3333 from a non-campus phone, or in person at the Public Safety Command Center, Campus Center Main Lobby, Philadelphia Main Campus.

Members of the campus community who suspect a crime is in progress or suspect a crime posing an imminent or serious threat should contact Public Safety immediately so a campus warning can be sent, if warranted. If community members report crimes or serious incidents to other University administrators, those administrators should notify Public Safety. The department will collaborate with these administrators to issue a timely warning, if warranted.

Emergency Notifications

The Tiger Alert Emergency Notification System enables the University to quickly notify the Holy Family University community of critical information during a major emergency that affects the Northeast and/or Newtown campuses. This is performed without delay once a serious incident is

confirmed by law enforcement and is accomplished through use of email, text messaging and digital displays. The Public Safety Department may also post a notice on the campus-wide electronic bulletin boards and the Holy Family University website, www.holyfamily.edu, providing the university community with more immediate notification.

The Asst. V.P. for Public Safety or designee will, upon receipt of notification of a significant emergency or dangerous situation involving an immediate threat to the health or safety of students and employees of the Northeast and/or Newtown Campus, contact the appropriate jurisdiction to confirm the situation. The Tiger Alert Emergency Notification System is only activated for significant emergencies that are confirmed by law enforcement personnel and with the approval of the University's senior leadership. The Emergency Notification System is not activated if in the professional judgment of the responsible authorities such a notification would compromise efforts to resolve the emergency. When an Emergency Alert is sent the proper message is selected from several pre-scripted messages and sent to the appropriate audience. An Emergency Alert can only be sent by one of several initiators who are trained by the Public Safety Department.

Some examples when an Emergency Alert may be issued include:

- Outbreak of meningitis, norovirus or other serious illness
- Approaching serious weather
- Earthquake
- Gas leak
- Terrorist incident
- Armed intruder
- Bomb threat
- Civil Unrest
- Explosion

Furthermore, the Emergency Notification System is tested annually to ensure all faculty, staff and students are familiar with emergency alerts and what their individual roles are during an actual situation. The testing can be announced or unannounced. Results are documented by the Asst. V.P. for Public Safety and/or his/her designee and made public to the community through campus email. The Asst. V.P. for Public Safety or designee is responsible for the initiation of Emergency Alerts, as well as managing the lists of who receives them.

Campus Assessment, Response, Evaluation (CARE) Team

The CARE Team has the ability to set into motion interventions to mitigate behaviors. The CARE team has direct authority to take action and coordinate intervention, without university delay. Direct authority may include the ability to enact recommendation for timely warnings or to enact recommendation for emergency notification. If at any time, the CARE Team makes a recommendation for a timely warning or emergency notification, the V.P. for Public Safety and/or the Director of Security is notified for dissemination of such alert.

Safety Information

The Public Safety website provides current security and safety-related information to the Holy Family community. The website allows for instant access to policies and procedures, security tips, daily crime log, Safety Alerts, security email and information related to the Student Right to Know and Campus Security Act. The website is:
<https://www.holyfamily.edu/about/administrative-services/campus-safety-security>.

Daily Incident Journal

Holy Family's Public Safety Department maintains an incident journal in its office. This is a chronological listing of all crimes and significant incidents responded to and documented by Public Safety Officers. It also includes the names of persons arrested, if known, and charged in criminal situations. It is open for review by any member of our community.

Emergency Drills, Testing and Evacuation Procedures

The Public Safety Department conducts emergency drills and procedures on an annual basis. The drills are assessed to ascertain the effectiveness of the policy and safety of the campus community. These findings are published electronically through the campus email system after the annual drills.

Security Awareness & Crime Prevention Programs

Installation of Panic Buttons

As a multi-unit program, the division of Student Affairs, Informational Technology, and Public Safety have worked collaboratively in support of the installation of immediate assistance buttons located in offices across campus.

Maintenance of Campus Safety

The Public Safety Department does a daily evaluation of all potential safety concerns such as campus lighting, parking lot safety, and access points. All safety concerns are reported to the Asst. V.P. for Public Safety or designee, who in turn contacts the appropriate campus department for repair or replacement.

Assistance Call Boxes

The university provides assistance call boxes throughout the campus for safety and convenience. These assistance call boxes, when activated, automatically contact a Public Safety officer and notify him or her of the caller's exact location. Students, faculty and staff are encouraged to learn the location of the assistance call boxes and to use them for all security-related and emergency communications. Security Officers respond 24 hours a day, every day. Any problems regarding the condition and/or use of the emergency call boxes should be forwarded to the Public Safety Department immediately by calling 267-341-3361.

Walking Escorts

Upon request, the Public Safety Department is available to provide walking escorts to all Holy Family students, faculty, staff and visitors, 24 hours a day, every day to any location on campus. Call 267-341-3361.

Identification Cards

All current Holy Family students, faculty, and staff are issued identification cards for entering campus buildings and events, as well as for access to many university services. All university faculty, staff, and students may be required to produce a proper Holy Family ID upon request from Public Safety Officer or a university official when present on any university-owned property.

Bike Registration

The Public Safety Department, as part of its Campus Security Awareness program, offers members of the Holy Family community the opportunity to register their bikes. Although the program is not specifically designed to prevent the theft of bikes from campus, it should heighten the awareness of the university community, while deterring would-be-thieves.

Crime Prevention

Crime Prevention seminars and orientations are conducted at the start of each semester and periodically throughout the year for all students and employees. Some of the prevention seminars include: personal safety, awareness of surroundings, securing personal property in the workplace, as well as training programs on proper use of the university identification cards in order to access locations on campus. Crime Prevention publications are available from the Public Safety Department and distributed to the campus community periodically throughout the year.

Campus Safety Policies

Throughout the year, members of the Public Safety staff speak to faculty, staff, commuters

and residents on topics including sexual assault, date rape, theft prevention, personal safety, victim services and alcohol and drug awareness. The Asst. V.P. for Public Safety conducts seminars periodically through New Hire Orientation, as well as Worksite Wellness Week and Open Enrollment.

Drug, Alcohol, & Substance Abuse Policies, Processes and Education

Alcohol and Other Drugs

Holy Family University's educational concern is for our students to achieve the greatest level of personal and academic success by creating an environment for growth by and among its community and its commitment to the physical and emotional health and well-being of all those who work, study, or congregate at the University. The possession, use, distribution, or sale of narcotics or drugs other than those medically prescribed, and stored in the original container, by students, faculty, staff, or visitors on university grounds or while on University business is prohibited. Off-campus possession, use, distribution, or sale of narcotics or drugs by students, faculty or staff is inconsistent with the university's policies and goals, and is therefore prohibited. Any and all types of drug paraphernalia, including, but not limited to, bong, pipes, and any items modified or adapted so they can be used to consume drugs, are not permitted on university property. It applies to all members of the University including students, faculty and staff, alumni, friends and guests on the University campus. The University reserves the right to take disciplinary action against any member of the University community for off-campus behavior that violates this policy.

Students are expected to immediately report conduct or activity which poses a danger to the community or its members. This is most important in medical emergencies due to drug or alcohol use. Students should not hesitate to seek help because of fear of disciplinary action. An individual person who actively seeks help for an intoxicated or under the influence will not, in most circumstances, be charged under the University Judicial Process for seeking help, as determined within the discretion of the University. If applicable, an investigation into the event may be deemed necessary. While Holy Family reserves the right to follow its own judicial process, Holy Family University works in collaboration with the applicable law enforcement agencies when any federal, state, or local laws are violated.

State Law of Pennsylvania on Alcoholic Beverages

The following information is included in all University Policy and Procedural Handbooks, specifically in relation to alcohol on campus:

In addition to violations of University policies, there are state and local laws including, but not limited to, Title 18 (Pennsylvania Crimes Code) and Title 75 (the Pennsylvania Vehicle Code) that impose significant criminal penalties if violated. Title 18: Note, in particular, Sections 5505 (Public Drunkenness); 6307 (Misrepresentation of Age to Purchase Liquor or Malt Policies, Regulations, Statements and Guidelines Brewed Beverages (Beer)); 6308 (Purchase, Consumption, Possession or Transportation of Liquor or Malt or Brewed Beverage by a Minor); 6310.1 (Selling or Furnishing Liquor or Malt or Brewed Beverages to Minors); 6310.7 (Selling or Furnishing Non-Alcoholic Beverages to Persons Under 21); 6310.2 (Manufacture or Sale of False Identification Card); 6310.3 (Carrying a False ID); and, 3809 (Restriction on Alcoholic Beverages (Open Container)). Title 75: Note, in particular, Sections 3718 (Minor Prohibited from Operating with Any Alcohol in System); 3802 (Driving Under the Influence of Alcohol or Controlled Substance); 3802(a) (General Impairment); 3802(b) (High Rate of Alcohol); 3802(c) (Highest Rate of Alcohol); 3802(d) (Controlled Substances); 3802 (e) (Minors); 3802(f) (Commercial or School Vehicles); 3735 (Homicide by Vehicle While Driving under the Influence); and, 3735.1 (Aggravated Assault by Vehicle while Driving under the Influence).

Pennsylvania Liquor Laws

The following information is included in all University Policy and Procedural Handbooks, specifically in relation to alcohol on campus:

It shall be unlawful for a person less than twenty-one (21) years of age to attempt to purchase, consume, possess, or knowingly and intentionally transport an alcohol or malt or brewed beverage within the commonwealth. The penalty for the second or third violations is a fine no greater than \$500.00. It is unlawful to misrepresent your age, or transfer a registration card for the purpose of falsifying age to secure malt or alcoholic beverages. The penalty for the second or third violations is a fine no greater than \$500.00. It is unlawful to sell, furnish, or give any minor under twenty-one (21) years of age any malt or alcoholic liquor. The penalty for the second or third violations is a fine no greater than \$500.00.

Alcohol Policy

The University prohibits students to consume or possess alcohol under any circumstances. The possession, use, distribution of alcohol, or possession of paraphernalia by members of the University community may result in disciplinary action. Intoxication, disorderliness, or offensive behavior that may be related to alcohol will also result in disciplinary action. The policy also extends to University-related events conducted off campus. The University, under strict approval of the President, may conduct specialized events where alcohol is served; these events must be properly registered and steps must be taken to prevent under-age consumption.

It is unlawful to sell, furnish or provide alcohol to a person under the age of 21. The possession of alcohol by anyone under 21 years of age in a public place is illegal. It is also a violation of the Holy Family University policy for anyone to consume or possess alcohol in any public or private area of campus without prior University approval.

Members of the University community are expected to be aware of and obey state and municipal laws or ordinances regulating the use, possession or sale of alcoholic beverages and federal and state laws regarding controlled substances. Those who are cited for violations of laws or ordinances by state, federal, or municipal authorities may also face University disciplinary proceedings and may be required to pursue counseling, an educational program, or treatment. Resident students should reference the Residence Life Policies outlined in the Student Handbook for specific information regarding expectations of resident students with regard to the alcohol policy.

Examples of alcohol violations include, but are not limited to:

1. Possession and/or consumption of alcohol;
2. Knowingly furnishing, transporting, and/or allowing minors to consume alcohol;
3. Use of alcohol resulting in involuntary, erratic and/or abusive behavior;
4. Possession of a keg, beer ball or other common source alcohol containers;
5. Involvement in the high-risk use of alcohol;
6. Persons observed in a residence on campus or off-campus when an open container of alcohol is present;
7. Open container of alcohol in a public area.

State Law of Pennsylvania on Drugs

State law prohibits the unauthorized manufacture, sale, delivery and possession of controlled substances. Persons may be subject to 30 days imprisonment and a \$500 fine for simple possession of a small amount of marijuana (misdemeanor), a maximum of 15 years imprisonment and a \$25,000 fine for manufacture, delivery or possession of a Schedule I or II controlled narcotic drug such as cocaine, PCP, and LSD (felony).

Sentences can be doubled for second and subsequent convictions. Sentences can also be doubled for distribution of controlled substances to persons under the age of 18. Penalties range from mandatory minimum sentence of one year and a \$5,000 fine for the first conviction or to a

mandatory minimum sentence of seven years and a \$50,000 fine for subsequent convictions for the manufacture, delivery or possession of 100 grams or more of a Schedule I or II controlled narcotic drug.

Holy Family University students are subject to prosecution under the Pennsylvania Controlled Substance; Drug, Device and Cosmetic Act for drug abuse and unlawful drug use and unlawful drug sales. The following state and federal laws concerning specific illicit drugs are drawn from the Controlled Substance, Drug, Device and Cosmetic Act, 35 p.s. section 107 708-113 et, seq. of the Commonwealth of Pennsylvania and from the Federal Drug Abuse Prevention and Control Act, 2 U.S.C.A. 801, et, seq., (specifically, the penalties for manufacturing, distributing, dispensing or possessing a controlled substance are found in section 84I of the Act).

Other Drugs Policy

The use, possession, or distribution of illegal narcotics or other controlled substances except as expressly permitted by federal, state and/or local law is prohibited. The misuse of prescription drugs is also prohibited. Drug paraphernalia such as bong, hookahs, roach clips, pipes, and other drug paraphernalia, which may indicate illegal drug use, are prohibited on campus and possession may result in disciplinary action. Students present in an incident involving drugs who have taken no action to remove themselves from, seek help for, or prevent the behavior could be subject to the same repercussions as those actively involved.

Examples of drug violations include, but are not limited to:

1. Illegal or improper use, possession, cultivation, distribution, manufacture, or sale of any drug(s), including prescribed medications;
2. Illegal or improper use of solvents, aerosols, or propellants;
3. Administration or employment of drugs or intoxicants causing another person to become impaired without his or her knowledge.

Disciplinary Process

A student who is alleged to have engaged in an alcohol or drug violation receives communication of the alleged violation and is scheduled for a meeting with an Administrative Hearing Officer or Judicial Hearing Board, as outlined in the Student Handbook.

If a student is found in a hearing to violate a policy, a sanction shall be imposed on the responsible person or party. Potential sanctions for students violating the Alcohol and other Drug Policy may include:

- Warning: Written or verbal notice given that is kept on file
- Program Attendance or Facilitation: Expectation to attend or facilitate an educational program(s)
- Writing Assignment: Requirement to complete a relevant research and/or reflection paper
- Discretionary Sanctions: Requirement to complete and or participate in work assignments, community service, University services or programs, or other related discretionary assignments
- Loss of Privileges: Denial of specific privileges for a defined period of time (e.g., guest, computer, housing selection, visitation, dining services, University representation, co-curricular activities, athletic participation, work study position, leadership role)
- Counseling Assessment/Meetings: Complete a number of counseling or assessment sessions
- Fines: Requirement to pay a specified monetary fee to the University
- Restitution: Requirement to make payment to the University, other persons, groups, or organizations for damage

- Administrative Relocation in University Housing: Requirement to be placed in an assigned or relocated space in University Housing
- Disciplinary Probation: A period of fixed duration, during which the status of a student at the University may be evaluated. This includes the possibility of more severe sanctions if the student is found responsible for violating University policy during the probationary period.
- Deferred Suspension: A designated period of time during which a student is given the opportunity to demonstrate the ability to abide by University policies. If the student is found in violation of any University policy during the time of deferred suspension, a suspension may take effect immediately without further review. Additional sanctions appropriate to the new violation may also be issued.
- Removal from University Residence: Separation from the residence halls for a defined period of time. The student may be prohibited from participating in the University dining program. The student will be barred from entering all residences within the University residential community during the time of removal from campus housing.
- Suspension: Separation from the University for a specified period of time. The student shall not participate in any University-sponsored activity and may be banned from the University premises. The University will not accept any credits earned from another institution during this period towards a University degree. In case of residence hall groups, this sanction may include the disbanding of a living unit, and in the case of student organization, this may include the removal of recognition. Reinstatements shall require the approval of the Vice President for Student Affairs, or other Senior-level Administrator, as designated.
- Expulsion: Permanent separation from the University and University facilities.
- Revocation of Admission and/or Degree: Admission to or a degree awarded from the university may be revoked at any time of fraud, misrepresentation, or another violation of the Code of Conduct in obtaining the degree, or for other serious violations committed prior to graduation or admission.
- Withholding Degree: University may withhold awarding a degree otherwise earned until the completion of the process set forth in the Judicial Process, including the completion of all sanctions imposed, if any.

Suggested Sanctions for alcohol violations

- 1st incident: Administrative hearing, written warning, and fine.
- 2nd Incident: Administrative hearing, increase of fines, educational program/ reflection paper, or Counseling Assessment.
- 3rd Incident: Administrative hearing, increase of fines, Counseling Assessment, educational program/ reflection paper, parental involvement, or probationary status.
- 4th Incident or more: Administrative hearing/ Judicial Hearing Board, increase of fines, removal from housing, suspension, or expulsion.

Suggested sanctions for low-level drug violations (copied from the Hearing Office Manual)

- Drug 1: education, disciplinary probation
- Drug 2: suspension (considered for higher-level drug violations)

A complete report can be found on the Higher Education Opportunity Act website, <https://www.holyfamily.edu/about/administrative-services/institutional-effectiveness/higher-education-opportunity-act-2008-heoa>.

Alcohol and Other Drug Abuse Prevention

Research on the abuse of alcohol and the use of other drugs by college students indicates that

these behaviors pose a serious threat to the educational environment, which includes not only the

campus but the surrounding community as well. Therefore, the efforts of the University are primarily directed toward educating students about the effects of alcohol and other drug use and helping them learn to make healthy choices.

Health risks associated with the use of illicit drugs and alcohol abuse may include but not limited to heart problems, malnutrition, convulsions, cancer, hepatitis, liver damage, coma and death. Related and equally serious risks include: impaired judgment, sexual assault, unplanned pregnancy, inability to manage academic stress, and academic failure. Recognizing that students may need to seek support for addressing difficulties that can arise from alcohol and/or other drug use, Holy Family University encourages them to visit the Counseling Center, University Health Services, or Campus Ministry. Confidentiality will be strictly enforced as required by the code of ethics of the individual professional.

All students are encouraged to seek early help if they feel they have a problem with alcohol and/or other drugs, and to learn how to assist others with substance abuse problems. It is less likely that serious consequences will result from an alcohol or other drug problem with early assistance. Through the Counseling Services, students have free access to licensed counselors on campus for initial screening/consultation in regards to a concern around substance use, with possible referral to an outside agency. A Resource Room has been established and maintained by the Counseling Services which provide literature and a directory of available local organizations and agencies.

Other resources which are available within the community for assistance include:

- Alcoholics Anonymous – www.aa.org;
- College and Universities Alcoholics Anonymous - www.jeremyfrankphd.com/college-and-university-alcoholics-anonymous-meetings;
- Southeastern Pennsylvania Intergroup Association of Alcoholics Anonymous - www.sepennaa.org;
- Al-Anon – www.pa-al-anon.org;
- Narcotics Anonymous – naworks.org;
- ULifeline - www.ulifeline.org/
- Friends Hospital CRC – 1- (800) 889-0548 or (215) 831-2600
- Bucks County Mental Health Delegate - 1-800-499-7455

Referrals to a community agency are provided if a student's behavioral history, objective assessment, and individual and/or family interviews indicate more appropriate services are needed than can be provided by the Counseling Center. Counseling is available to students who have successfully completed a rehabilitation program and wish to return. Students may remain on campus if they are capable of maintaining a satisfactory level of performance while participating in a substance rehabilitation program that provides confidential communication to the counseling or health services. Students taking prescription drugs that may affect their class performance or behavior on campus should report this fact to the Counseling Center and Health Services.

Support Services for Employees

Holy Family University provides a confidential employee assistance program for full-time and part-time eligible employees with life coaching and counseling including but not limited to mental health and well-being assistance that includes drug and alcohol counseling. For more information, employees can refer to the Holy Family Benefits Portal, or contact human resources for guidance. In addition, benefit eligible employees can take advantage of the confidential mental health benefits available through the health insurance provided by PAISBOA Health Benefit Trust, and administered by Independence Blue Cross, by contacting 1-800-688-1911. Additionally, the Campus Minister is available as a resource and may be contacted at 267-341-3261.

Other external resources include:

Employees can call “First Call for Help” which is United Way’s free confidential referral service for 3,000 local health and human services agencies. Representatives are available for phone consultations Monday-Friday, 8:30AM- 5:00PM. Also, a message service is available evenings, holidays, and weekends: In PA call 215- 568-3750, and in NJ call 856-663-2255.

Substance Abuse and Mental Health Services Association (SAMHSA) National Helpline is available at 1-800-662- HELP (4357), (also known as the Treatment Referral Routing Service) or TTY: 1-800- 487-4889 is a confidential, free, 24-hour-a-day, 365-day-a-year, information service, in English and Spanish, for individuals and family members facing mental and/or substance use disorders. This service provides referrals to local treatment facilities, support groups, and community-based organizations. Callers can also order free publications and other information.

Student Notification

Emails are delivered to all enrolled students regarding a variety of topics around safety, as well as rights and responsibilities. These emails are circulated by the Asst. V.P. for Public Safety or designee, the Director of Counseling, and University Wellness Offices in an effort to assure students are knowledgeable about issues around drug and alcohol safety, and prevention resources.

Students are also made aware of the university’s biennial report focusing on drug and alcohol-abuse programs sponsored by Holy Family University, which is required by the Drug-Free Schools and Communities Act. The complete document can be found at: <https://www.holyfamily.edu/about/administrative-services/institutional-effectiveness/higher-education-opportunity-act-2008-heoa>.

Students have free access to licensed counselors on campus for initial screening/consultation in regards to a concern around substance use, with possible referral to an outside agency.

First Year Students

First Year Students are high at risk for alcohol and drug use and abuse due to the transitional issues they face. These students also enter the University community without much knowledge of the policies and procedures that will impact their lives. In order to combat this, Holy Family University has developed a program to reach the students where they are. The First Year Experience Course is designed to help students with their transition to the University, and allows an opportunity to focus on many topics students may face throughout their college career. During this course, students will be required to attend a Wellness Session with the Counseling Center. This workshop is designed to increase knowledge regarding state laws and university policy, increase understanding of how alcohol and other drugs affect them, increase knowledge of healthy decision making, increase awareness of bystander intervention, and offers information on where to get help and resources for alcohol and substance use issues.

Student Athletes

Every August, prior to the beginning of the academic year, student athletes are required to read through the Department of Athletics’ policies that offer information on random/suspicious

drug testing.

The topic areas covered are as follows:

1. Department of Athletics Random / Suspicious Drug Testing Policy
2. Department of Athletics Reinstatement Policy
3. Department of Athletics Missed Class Policy
4. Department of Athletics Mandatory Athletic Department Meetings Policy
5. Department of Athletics Mandatory Study Hall Policy for All Freshman and At-Risk Student Athletes
6. Department of Athletics Online Social Networking Websites Policy

Other alcohol and drug-related initiatives occur during both the academic and calendar year. Drug-testing is done randomly in-house (or based upon suspicion) throughout the academic year. Drug testing is also conducted through the NCAA via Drug-Free Sport on a random basis throughout the calendar year.

The Student Athlete Advisory Committee (SAAC) discusses drug-related policies and legislation at conference meetings in September and March during the calendar year. Such drug policy discussions occur institutionally at each SAAC meeting which is held bi-weekly. SAAC addressing drug policies and related legislation is vital as they have a direct impact on the creation or amending of NCAA drug policy legislation.

At the Department of Athletics' opening meeting in September of each academic year, information is relayed regarding drug-testing policies.

Furthermore, each head coach, at the beginning of the academic year, implements specific team policies that set policies for consequences associated with drug use and drug testing. The team policies are in line with the Department of Athletics' policy regarding drug use and testing.

As a community engagement initiative, they conduct their Build-A-Library program in November and April of the academic year. During the presentation of the collected books to the respective school in which the department is donating to, student-athletes speak to the young students about avoiding the perils associated with drug use and having the courage to not engage in drug use. Messages delivered by student athletes touch upon avoiding drugs, studying hard, and pushing toward continuing their education to attend college.

Residential Students

Residence Life conducts an extensive training each fall and winter with all Resident Advisors to discuss personal responsibility, as well as how to talk with their residents about alcohol and other drug issues. Working with the Counseling Center, Public Safety, Title IX, and Health Services, workshops are focused on how to spot the signs of abuse, overdose and possible addiction. Resident Advisors are trained with necessary skills needed to mentor their residents. Throughout the year, Resident Advisors are given access to the Counseling Center for questions, information, and other resources.

Resident Advisors are required to provide educational bulletin boards on topics related to alcohol, drugs and wellness education, and support alcohol-free alternative events.

Campus-wide Programming Efforts

Every student on campus will come in contact with alcohol at some point and will have to

make decisions whether to drink or not. To help our students make appropriate decisions, it is our responsibility to educate students about the impact of alcohol and other drugs, as well as, how to make responsible choices. Holy Family University uses a variety of platforms to reach all students where they live, work and socialize. All resources available for designated student populations are available to the entire campus.

Campus organizations partner to provide collective activities for Awareness Weeks or Awareness Days during the year. Each Awareness Week or Day has some outreach event and education surrounding the issues at hand.

Suicide Prevention: October
 Campus Safety Month: October
 Domestic Violence Awareness Month: October
 Alcohol Awareness Month: March
 Sexual Assault Awareness Month: April

Late nights and Weekends

Student Government Association has committees dedicated to providing weekend nighttime programming. Each weekend there is an on-campus event or an off-campus trip to provide an alcohol-free alternative to students. The Campus Center is open every night until midnight. Students have access to basketball courts (when not in use by athletics), pool tables, ping pong, as well as the Upper and Lower Level of the Campus Center Commons.

Campus Clubs and Organizations

There are currently 27 clubs and organizations who plan events throughout the week for students to get involved.

Alternative Spring Break

Students are selected for an opportunity to work with Habitat for Humanity and utilize their spring break as a way to dedicate their time to service for others. The group meets regularly working on leadership workshops, fundraising opportunities, service awareness opportunities as well as local project "build days" throughout the year leading up to the trip.

Environmental Approaches Off-Campus and 8th Police District Advisory Council

The Vice President for Student Affairs and Asst. V.P. for Public Safety sit on a standing monthly council board to discuss the safety concerns of the police district. This is a council to address and hear the concerns of the district and its constituents in the area as well as for the 8th Police District report on local crime in the area.

Sexual Assault, Domestic Violence, Dating Violence, and Stalking

Policy Availability

<https://www.holyfamily.edu/current-students/title-ix/process-procedures-university-response>

Sexual Harassment & Nondiscrimination Policy

Holy Family University is committed to providing a workplace and educational environment, as well as other benefits, programs, and activities, that are free from discrimination, harassment, and retaliation. To ensure compliance with federal and state civil rights laws and regulations, and to affirm its commitment to promoting the goals of fairness and equity in all aspects of the educational program or activity, Holy Family University has developed internal policies and procedures that provide a prompt, fair, and impartial process for those involved in an allegation of discrimination or harassment on the basis of protected class status, and for allegations of retaliation. Holy Family University values and upholds the equal dignity of all members of its community and strives to balance the rights of the parties in the grievance process during what is often a difficult time for all those involved.

Policy was adopted July 2020. Policy updated July 2022.

Policy Application

The core purpose of this policy is the prohibition of all forms of discrimination. Sometimes, discrimination involves exclusion from or different treatment in activities, such as admission, athletics, or employment. Other times, discrimination takes the form of harassment or, in the case of sex-based discrimination, can encompass sexual harassment, sexual assault, stalking, sexual exploitation, dating violence or domestic violence. When an alleged violation of this anti-discrimination policy is reported, the allegations are subject to resolution using Holy Family University's "Title IX Grievance Policy" or "Code of Conduct/Allegation of Violation of Nondiscrimination Policy," as determined by the Title IX Coordinator, and as detailed below.

To the extent that alleged misconduct falls outside the Title IX Grievance Policy, or misconduct falling outside of the Title IX Grievance Policy is discovered in the course of investigating covered Title IX misconduct, the institution retains authority to investigate and adjudicate the allegations under the policies and procedures defined within the Student Code of Conduct, Employee Code of Conduct, the Student Code of Conduct, Employee Code of Conduct, or those policies established for allegations of non-sex based discrimination and harassment through a separate grievance proceeding.

When the Respondent is a member of the Holy Family University community, a grievance process may be available regardless of the status of the Complainant, who may or may not be a member of the Holy Family University community. This community includes, but is not limited to, students, student organizations, faculty, administrators, staff, and third parties such as guests, visitors, volunteers, invitees, and campers. The procedures below may be applied to incidents, to patterns, and/or to the campus climate, all of which may be addressed and investigated in accordance with this policy.

The requirements and protections of this policy apply equally regardless of sex, sexual orientation, gender identity, gender expression, or other protected classes covered by federal or state law. All requirements and protections are equitably provided to individuals regardless of such status or status as a Complainant, Respondent, or Witness. Individuals who wish to file a complaint about the institution's policy or process may contact the Department of Education's Office for Civil Rights

using contact information available at <https://ocrcas.ed.gov/contact-ocr>.

University Title IX Coordinator

Marianne Price, M.S. serves as the Title IX Coordinator for Holy Family University. The Title IX Coordinator oversees implementation of the University's Sexual Harassment and Nondiscrimination Policy, and has the primary responsibility for coordinating Holy Family University's efforts related to the intake, investigation, resolution, and implementation of supportive measures to stop, remediate, and prevent discrimination, harassment, and retaliation prohibited under this policy.

The Title IX Coordinator acts with independence and authority free from bias and conflicts of interest. The Title IX Coordinator oversees all resolutions under this policy and these procedures. The members of the Title IX Team are vetted and trained to ensure they are not biased for or against any party in a specific case, or for or against Complainants and/or Respondents, generally. To raise any concern involving bias or conflict of interest by the Title IX Coordinator, or to report misconduct or discrimination committed by the Title IX Coordinator, contact the Vice President for Student Affairs. Concerns of bias or a potential conflict of interest by any other Title IX Team member, or reports of misconduct or discrimination by a Title IX Team member, should be raised with the Title IX Coordinator.

Contact Information

Complaints or notice of alleged policy violations, or inquiries about or concerns regarding this policy and procedures, may be made internally to:

Marianne Price, Dean of Students & Title IX Coordinator
 Campus Center Room 209, Philadelphia Main Campus
 9801 Frankford Avenue, Philadelphia, PA 19114
 267-341-3204
mprice@holyfamily.edu | titleix@holyfamily.edu
<https://www.holyfamily.edu/title-ix>

Deputy Title IX Coordinator and Nondiscrimination Coordinator

The Deputy Title IX Coordinator supports the coordination and implementation of the University's compliance efforts for the Sexual Harassment and Nondiscrimination Policy, and provides assistance to the Title IX Coordinator for intake meetings, initial assessment, oversight of investigations, and training and prevention efforts. The Deputy Title IX Coordinator also serves as a Title IX & Civil Rights Investigator.

La-Riese Eldridge-Garcia, Associate Dean of Students
 Campus Center Room 208, Philadelphia Main Campus
 9801 Frankford Avenue, Philadelphia, PA 19114
 267-341-3504
dos@holyfamily.edu

Title IX & Civil Rights Investigators

Under direction of the Title IX Coordinator, Title IX & Civil Rights Investigators investigate complaints filed by students and employees involving civil rights and discrimination issues, as well as sex-based discrimination, sexual harassment, sexual assault, stalking, sexual exploitation, dating violence or domestic violence and retaliation. Investigators complete in-depth and ongoing training, and assist the University in ensuring a timely response and resolution of complaints. The University retains the right to utilize external Investigators when it deems necessary.

Policy on Nondiscrimination

Holy Family University adheres to all federal and state civil rights laws and regulations prohibiting discrimination in private institutions of higher education. The University does not discriminate against any employee, applicant for employment, student, or applicant for admission on the basis of: race, color, religion, age, sex, sexual orientation, gender identity or expression, national or ethnic origin, ancestry, disability, marital status, military/veteran status, or any other protected category under applicable local, state, or federal law, including protections for those opposing discrimination or participating in any grievance process on campus, with the Equal Employment Opportunity Commission, or other human rights agencies.

This policy covers nondiscrimination in both employment and access to educational opportunities. Therefore, any member of the Holy Family University community whose acts deny, deprive, or limit the educational, employment, residential and/or social access, benefits, and/or opportunities of any member of the University community, guest, or visitor on the basis of that person's actual or perceived membership in the protected classes listed above is in violation of the University's policy on nondiscrimination.

When brought to the attention of Holy Family University, any such discrimination will be promptly and fairly addressed and remedied by the University according to the Nondiscrimination Policy grievance process described below.

Policy on Disability Discrimination and Accommodation

Holy Family University is committed to full compliance with the Americans with Disabilities Act of 1990 (ADA), as amended, and Section 504 of the Rehabilitation Act of 1973, which prohibit discrimination against qualified persons with disabilities, as well as other federal and state laws and regulations pertaining to individuals with disabilities.

Dean's Price and Eldridge-Garcia, dos@holyfamily.edu, titleix@holyfamily.edu have been designated as the University's ADA/Section 504 C0-Coordinators responsible for overseeing efforts to comply with these disability laws, including responding to grievances and conducting investigations of any allegation of noncompliance or discrimination based on disability.

Grievances related to disability status and/or accommodations will be addressed using the Section 504/ADA Grievance Procedures as outlined in the Student Handbook.

Policy on Discriminatory Harassment

Students, staff, administrators, and faculty are entitled to an employment and educational environment that is free of discriminatory harassment. Holy Family University's harassment policy is not meant to inhibit or prohibit educational content or discussions inside or outside of the classroom that include germane but controversial or sensitive subject matters protected by academic freedom.

The sections below describe the specific forms of legally prohibited harassment that are also prohibited under the Sexual Harassment and Nondiscrimination policy. When speech or conduct is protected by academic freedom and/or the First Amendment, it will not be considered a violation of this policy, though supportive measures will be offered to those impacted. All policies encompass actual and/or attempted offenses.

Discriminatory Harassment

Discriminatory harassment constitutes a form of discrimination that is prohibited by University policy. Discriminatory harassment is defined as unwelcome conduct by any member or group of the community on the basis of actual or perceived membership in a class protected by policy or law.

Holy Family University does not tolerate discriminatory harassment of any employee, student, visitor, or guest. The University will act to remedy all forms of harassment when reported, whether or not the harassment rises to the level of creating a “hostile environment.”

A hostile environment is one that unreasonably interferes with, limits, or effectively denies an individual’s educational or employment access, benefits, or opportunities. This discriminatory effect results from harassing verbal, written, graphic, or physical conduct that is severe or pervasive and objectively offensive.

When discriminatory harassment rises to the level of creating a hostile environment, the University may also impose sanctions on the Respondent through application of the [appropriate] grievance process below.

Holy Family University reserves the right to address offensive conduct and/or harassment that 1) does not rise to the level of creating a hostile environment, or 2) that is of a generic nature and not based on a protected status. Addressing such conduct will not result in the imposition of discipline under University policy, but may be addressed through respectful conversation, remedial actions, education, effective Alternate Resolution, and/or other informal resolution mechanisms.

For assistance with Alternate Resolution and other informal resolution techniques and approaches, employees should contact Human Resources, and students should contact the Director of Equity & Inclusion / Deputy Title IX Coordinator.

Policy on Sexual Harassment

The Department of Education’s Office for Civil Rights (OCR), the Equal Employment Opportunity Commission (EEOC), and the State/Commonwealth/District of Pennsylvania regard Sexual Harassment, a specific form of discriminatory harassment, as an unlawful discriminatory practice. Acts of sexual harassment may be committed by any person upon any other person, regardless of the sex, sexual orientation, and/or gender identity of those involved. Sexual Harassment, as an umbrella category, includes the offenses of sexual harassment, sexual assault, domestic violence, dating violence, and stalking, and is defined as:

1. Quid Pro Quo: An employee conditioning educational benefits on participation in unwelcome sexual conduct;
2. Sexual Harassment, which includes unwelcome conduct that a reasonable person would determine is so severe, pervasive, and objectively offensive that it effectively denies a person equal access to the educational institution’s education program or activity;
3. Sexual assault (as defined in the Clery Act), which includes any sexual act directed against another person, without the consent of the victim including instances where the victim is incapable of giving consent;
4. Dating violence (as defined in the Violence Against Women Act (VAWA) amendments to the Clery Act), which includes any violence committed by a person:
 - a. who is or has been in a social relationship of a romantic or intimate nature with the victim; and
 - b. where the existence of such a relationship shall be determined based on a consideration of the following factors:
 - i. The length of the relationship;
 - ii. The type of relationship;

- iii. The frequency of interaction between the persons involved in the relationship.
5. Domestic violence (as defined in the VAWA amendments to the Clery Act), which includes any felony or misdemeanor crimes of violence committed by a current or former spouse or intimate partner of the victim, by a person with whom the victim shares a child in common, by a person who is cohabitating with or has cohabitated with the victim as a spouse or intimate partner, by a person similarly situated to a spouse of the victim under Pennsylvania's domestic or family violence laws or 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 Pennsylvania.
6. Stalking (as defined in the VAWA amendments to the Clery Act), meaning engaging in a course of conduct directed at a specific person that would cause a reasonable person to
 - a. fear for their safety or the safety of others; or
 - b. suffer substantial emotional distress.

For the purposes of this definition:

- i. Course of conduct means two or more acts, including, but not limited to, acts in which the Respondent directly, indirectly, or through third parties, by any action, method, device, or means, follows, monitors, observes, surveils, threatens, or communicates to or about a person, or interferes with a person's property.
- ii. Reasonable person means a reasonable person under similar circumstances and with similar identities to the Complainant.
- iii. Substantial emotional distress means significant mental suffering or anguish that may but does not necessarily require medical or other professional treatment or counseling.

Note that conduct that does not meet one or more of these criteria may still be prohibited under the Student Code of Conduct or Employee Code of Conduct.

Consent

For the purposes of this Title IX Grievance Policy, consent is defined by the University as an action that is:

- clear, knowing and voluntary;
- active, not passive;
- words or actions, as long as those words or actions create mutually understandable clear permission regarding willingness to engage in (and the conditions of) sexual activity.

Consent is:

- Explicitly communicated
- Reversible at any time
- Informed
- Voluntary
- Specific

Consent to any one form of sexual activity cannot automatically imply consent to any other forms of sexual activity.

Consent cannot be given:

- While asleep
- When unconscious
- If physically or mentally helpless
- If disoriented or unable to understand what is happening for any reason, including due to alcohol or drug use
- If under the applicable legal age of consent.

Sexual Misconduct Education and Prevention

Sexual Misconduct Resource Guide

All members of the community are provided access to a community resource guide. This guide outlines University sexual misconduct policies and related adjudication procedures. Additionally, the guide includes risk reduction tips, bystander intervention knowledge, and how to support victims of sexual violence.

Risk reduction tips are outlined below.

Risk Reduction: Staying Safe

- Consider Safety Planning: If you are being affected by sexual violence, current and long-term safety can be a concern. Safety planning is about brainstorming ways to stay safe, and thinking about ways to reduce the risk of future harm.
- Social Media Safety: What you choose to share on social media is always your decision, but what others choose to do with your information is not always in your control. Take charge of your personal safety by: using privacy settings, considering what you post before you post, turning off your location settings, and using private internet connections only.
- Using Technology to Hurt Others: Some people use technology, such as digital photos, videos, apps, and social media, to engage in harassing, unsolicited, or non-consensual sexual interactions.
- Think about Prevention: The only person responsible for committing sexual assault is a perpetrator, but all of us have the ability to look out for each other's safety. Whether it's giving someone a safe ride home or directly confronting a person who is engaging in threatening behavior, anyone can help prevent sexual violence.
- Visit <https://www.rainn.org/safety-prevention> for useful tools in staying safe and protecting others.

Risk Reduction: Consent Matters

- Consent is about communication. It's important to clearly communicate what you are comfortable with, and the best way to ensure all parties respect each other's boundaries is to talk about it. Consent is an agreement between participants to engage in an intimate activity, and it should happen every time.

Bystander Intervention Strategies

- Directly approach the situation and attempt to prevent the situation from escalating further.
- Disrupt the situation through distraction of the harasser or insert yourself into their interaction to help the targeted person get out of the situation.
- Create a distraction and potentially prevent a situation from escalating.
- Don't act alone, and call upon others to help to assure your safety.
- Step up, set an expectation, and say something when you hear or see something by commenting that a behavior is unacceptable and show others it will not be tolerated.
- Use your privilege positions to create change. Your age, race, sex or gender may make it safer for you to speak up and be vocal about harassment – especially when you are not the target or representative of the target group.

If You Have Experienced Sexual Violence

- Remain calm and alert.
- Find a safe location as soon as possible. Get to a place that you feel is with persons you trust: your home, a friend's home, a residence hall room.

- If you have been assaulted or raped, get medical attention as soon as possible. The Philadelphia Sexual Assault Response Center (PSARC) located at 300 E. Hunting Park Avenue in Philadelphia is a free medical resource. Contact PSARC at 215-425-1625.
- Preserve physical evidence. Collect tissue and fluid samples on towels, sheets, clothing, etc. Avoid showering or bathing until you have been examined. If you change your clothing, collect relevant evidence in a paper bag.
- Contact Public Safety at 267-341-3361 for 24/7 assistance.
- Call the local police to report an act of violence or assault.
- Contact the Title IX Coordinator at 267-341-3204 to report your incidence of sexual violence. Public Safety can contact the Title IX Coordinator at any time for 24/7 assistance.
- If you are seeking a Confidential Resource, visit the University Counseling Center, Health Services, or Campus Ministry for support.
- Students are urged to seek free, confidential counseling at the University Counseling Center by calling 267-341-3232 or visiting the Campus Center Room 204.

Helping Someone Who Has Experienced Sexual Violence

- Listen carefully.
- Provide a private and safe space.
- Let them know that what they have experienced is not their fault.
- Help connect them to campus resources.
- Support their choice in regard to their reporting options.
- Provide the information for the University Counseling Center.
- If you are a University faculty or staff member, share your requirement to report, and offer to guide the person to the appropriate University personnel. A person has the option not to report their instance of violence to law enforcement. While the Title IX Coordinator will help support a student in their reporting to local law enforcement, the University is not required to report to law enforcement on behalf of a student.

Tigers that ROAR: Reach Out and Recognize. Respond. Report.

At Holy Family University, our goal is simple – engage our entire campus community in the conversation around sexual violence. We want our students, faculty, and staff to have the knowledge to recognize instances of sexual violence. We want to empower our campus community to respond. We strive to encourage an active bystander approach to make sexual violence each person's responsibility. Through knowledge and education and a call to action, we look to foster a safe and supportive community in any effort or level of reporting on our campus.

Tigers that ROAR: Reach Out and Recognize.

Bystanders play a critical role in the prevention of sexual violence. At Holy Family University, we encourage our campus community members to take responsible and comfortable actions to prevent or stop an act of sexual violence. The first step is to recognize the behavior.

Preventing sexual harassment is every person's responsibility. An active bystander is someone who lives up to that responsibility by intervening before, during, or after a situation when they see or hear behaviors that threaten, harass, or otherwise encourage sexual violence.

Tigers that ROAR: Reach Out and Respond.

Taking action might look different to each person. Bystanders are encouraged to directly intervene, call Public Safety or law enforcement, or seek advice from a person of authority at the University. Community members who choose to exercise a moral obligation such as this will be supported by the University. It may not be safe or effective to directly confront the harasser in every case, but there are a range of ways can be involved before, during, or after a situation when they see or hear

behaviors that promote sexual violence.

Tigers that ROAR: Reach Out and Report.

Holy Family University is committed to supporting the rights of a person reporting an incident of sexual violence. We encourage your ability to make informed choices and decision by providing you with the resources and information to make such decisions. The Title IX Coordinator can help guide you through your options, resources, rights, and support services.

Assistance Following an Incident of Sexual Misconduct

Holy Family University offers on-campus support services even if an individual chooses not to report the incident. The Counseling Center provides confidential services, and provides information for victims in a safe, supportive and confidential setting. Contact the Holy Family University Counseling Center at 267-341-3232 and at 267-341-3333 for after-hours support.

Additional Support Services

Local to Campus Support Services

- Aria Hospital Crisis Center: 215-949-5252
- Aria Health - Bucks County: 215-949-5180

Medical Care for Sexual Assault

- Philadelphia Sexual Assault Response Center (PSARC)
300 E. Hunting Park Avenue Philadelphia, PA 19124
Hotline: 215-425-1625

24 Hour Hotlines/Organizations

- Philadelphia Center Against Sexual Violence (WOAR): 215-985-3333
- National Sexual Assault Hotline: 800-656-4673
- National Sexual Assault Online Hotline: online.rainn.org
- Philadelphia Domestic Violence Hotline: 866-723-3041
- Love is Respect: 1-866-331-9474
- Women in Transition: 215-751-1111
- Woman Organized Against Rape: 215-985-3333
- Women Against Abuse: 866-723-3014
- Support Services for the LGBTQ+ Community
- The Anti-Violence Project: 212-714-1124tel:2156868083
- GLBT National Help Center: 800-246-7743
- GLBTQ Domestic Violence Project Hotline: 800-832-1901

Support in Philadelphia

- Special Victims Unit 215-685-3251
- Police Sex Crimes Unit 215-685-1180, 215-685-1181, 215-685-1182
- Rape Prosecution Unit 215-686-8083
- Women's Law Project: 215-928-9801
- Philadelphia Commission on Human Relations: 215-686-4692
- Menergy: 215-242-2235
- Men's Resource Center: 215-564-0488

Training

Holy Family University has developed a comprehensive, annual training plan that includes information for all currently enrolled students, faculty, and staff.

All University faculty and staff are required to complete annual Title IX Training. This training includes information on Clery Act requirements, Responsible Employee designation, and information regarding VAWA. The annual training is completed utilizing a Canvas Learning Module and is assessed by the Title IX Office. All Campus Security Authorities are required to

review an additional training Module, and confirm understanding of requirements as a CSA.

During the AY17-18, the University purchased an online training system, SafeColleges, that will be utilized to manage annual training moving forward. This applies to all faculty, staff, and students. This training program was fully implemented in calendar year 2018.

All University Freshman (via the FEXP course), Campus Leaders, Student Athletes are required to complete an in-person training workshop through the Title IX Office. This workshop reviews the following:

- Identify domestic violence, dating violence, sexual assault and stalking as prohibited conduct;
- Define what behavior constitutes domestic violence, dating violence, sexual assault, and stalking;
- Define what behavior and actions constitute consent to sexual activity;
- Provide a description of safe and positive options for bystander intervention that may be carried out by an individual to prevent harm or intervene when there is a risk of domestic violence, dating violence, sexual assault, or stalking against a person other than the bystander
- Provide information on risk reduction so that students and employees may recognize warning signs of abusive behavior and how to minimize the risk of potential attacks;
- Provide an overview of information contained in the Annual Security Report in compliance with the Clery Act.
- Identify key ways in which student leaders can engage the campus community in discussions on these topics.
- Provide an understanding of why heightened roles on campus may be utilize for support and reporting.

Programming

Holy Family University is committed to providing opportunity for discussion and exposure to topics and concepts related to sexual violence and prevention. The University Title IX Office is the primary host and sponsor for educational programming on topics of consent, bystander intervention, risk reduction, identification of prohibited conduct, and healthy relationships.

Annual programming includes:

- Summer Orientation Workshop
- Fall Online Training Curriculum and Module dissemination
- Domestic Violence Awareness Month
- Spring Online Training Curriculum and Module dissemination
- Spring Orientation Workshop
- Sexual Assault Awareness Month

The Title IX Office frequently partners in collaboration with Student Engagement, Residence Life, Human Resources, Public Safety and the Counseling Center to provided wellness-based programming opportunities for students.

Reporting

Mandated Reporters

Holy Family University has also classified all employees as Mandated Reporters of any knowledge they have that a member of the community is experiencing harassment, discrimination, and/or retaliation.

Confidential Reporting

Holy Family University encourages all members of the community to report any incident of sexual misconduct as promptly as possible so that the University can respond effectively. The University recognizes, however, that not every person will choose to make a formal report with the University or with local law enforcement. When consulting campus resources, community members should be aware of confidentiality and mandatory reporting in order to make informed choices. On campus, some resources can offer confidentiality, sharing options and advice without any obligation to tell anyone unless the Complainant wants them to do so. Other resources are expressly required to report incidents of sexual misconduct to the Title IX Coordinator.

For those 18 or older who are not yet prepared to make a report or pursue a complaint under this Policy, the University provides confidential professional and pastoral counseling. Complainants may use these resources to talk to someone about an incident of sexual misconduct in a confidential manner whether or not they decide to make an official report, or to participate in the University complaint resolution process or the criminal justice system. Conferring with these resources will not trigger an investigation by the University or law enforcement.

Licensed mental health counselors, medical providers, and pastoral counselors are examples of University employees who may offer confidentiality. Only those University employees designated as outlined below can offer legally protected confidentiality.

Confidential professional and pastoral counselors can:

- Explain the reporting and resolution process.
- Provide support while the University or criminal processes are ongoing and/or pending.
- Explain options for obtaining additional support from the University and off-campus resources.
- Arrange for medical care and accompany complainants, or arrange for someone to accompany complainants to seek such care.
- Should the Complainant decide to file a complaint with the University or law enforcement, these individuals will direct the Complainant to the appropriate individuals to do so.

Professional counselors who provide mental-health counseling to members of the school community (and including those who act in that role under the supervision of a licensed counselor) are not required to report any information about an incident to the Title IX Coordinator without a Complainant's permission.

Professional counselors and confidential resources:

Counseling Services Clinicians
Philadelphia Main Campus, Campus Center Rooms 202 & 204
267-341-3222

A Pastoral Counselor is an employee of an institution, who is associated with a religious order or denomination, recognized by that religious order or denomination as someone who provides confidential counseling, and who is functioning within the scope of that recognition as a pastoral counselor. A Pastoral Counselor who provides pastoral counseling to members of the school community are not required to report any information about an incident to the Title IX Coordinator without a Complainant's permission.

Pastoral counselor and confidential resource:

Director of Campus Ministry
Philadelphia Main Campus, Campus Center, Room 224
267-341-3261

A Complainant can seek assistance and support from individuals who work or volunteer in the Campus Health Services. While these individuals must report that an incident occurred to the Title IX Coordinator, they are not required to reveal any personally identifying information about an incident to the University.

Following is contact information for these non-professional counselors and advocates:

Lead Clinician, Registered Nurse and Medical Assistant
Stevenson Lane Residence Hall Office 113
267-341-3262

Notice/Complaints of Discrimination, Harassment, and/or Retaliation

Notice or complaints of discrimination, harassment, and/or retaliation may be made using any of the following options:

1. File a complaint with, or give verbal notice to, the Title IX Coordinator, Deputy Title IX Coordinator, or Officials with Authority. Such a report may be made at any time (including during non-business hours) by using the telephone number or email address, or by mail to the office address, listed for the Title IX Coordinator or any other official listed.
2. Report online, using the reporting form posted at <https://holyfamily-pa.safecollegesincident.com>.

Anonymous reports are accepted but can give rise to a need to investigate. The University tries to provide supportive measures to all Complainants, which is impossible with an anonymous report. Because reporting carries no obligation to initiate a formal response, and as the University respects Complainant requests to dismiss complaints unless there is a compelling threat to health and/or safety, the Complainant is largely in control and should not fear a loss of privacy by making a report that allows the University to discuss and/or provide supportive measures.

Formal Complaint

A Formal Complaint means a document submitted or signed by the Complainant or signed by the Title IX Coordinator alleging a policy violation by a Respondent and requesting that the University investigate the allegation(s). A complaint may be filed with the Title IX Coordinator in person, by mail, or by electronic mail, by using the contact information in the section titled "Contact Information", or as described in this section. As used in this paragraph, the phrase "document filed by a Complainant" means a document or electronic submission (such as by electronic mail or through the University's online portal at <https://holyfamily-pa.safecollegesincident.com>) that contains the Complainant's physical or digital signature, or otherwise indicates that the Complainant is the person filing the complaint, and requests that the University investigate the allegations. If notice is submitted in a form that does not meet this standard, the Title IX Coordinator will contact the Complainant to ensure that it is filed correctly.

Non-Investigatory Measures Available

Supportive Measures

Holy Family University will offer and implement appropriate and reasonable supportive measures to the parties upon notice of alleged harassment, discrimination, and/or retaliation. Supportive measures are non-disciplinary, non-punitive individualized services offered as appropriate, as reasonably available, and without fee or charge to the parties to restore or preserve access to the University's education program or activity, including measures designed

to protect the safety of all parties or the University's educational environment, and/or deter harassment, discrimination, and/or retaliation.

The Title IX Coordinator promptly makes supportive measures available to the parties upon receiving notice or a complaint. At the time that supportive measures are offered, the University will inform the Complainant, in writing, that they may file a formal complaint with the University either at that time or in the future, if they have not done so already. The Title IX Coordinator works with the Complainant to ensure that their wishes are taken into account with respect to the supportive measures that are planned and implemented.

The University will maintain the privacy of the supportive measures, provided that privacy does not impair the University's ability to provide the supportive measures. The University will act to ensure as minimal an academic/occupational impact on the parties as possible. The University will implement measures in a way that does not unreasonably burden the other party.

These actions may include, but are not limited to:

- Referral to counseling, medical, and/or other healthcare services
- Referral to the Employee Assistance Program
- Referral to community-based service providers
- Visa and immigration assistance
- Student financial aid counseling
- Education to the institutional community or community subgroup(s)
- Altering campus housing assignment(s)
- Altering work arrangements for employees or student-employees
- Safety planning
- Providing campus safety escorts
- Providing transportation accommodations
- Implementing contact limitations (no contact orders) between the parties
- Academic support, extensions of deadlines, or other course/program-related adjustments
- Persona Non Grata (PNG) orders
- Timely Warnings
- Class schedule modifications, withdrawals, or leaves of absence
- Increased security and monitoring of certain areas of the campus
- Any other actions deemed appropriate by the Title IX Coordinator

Violations of no contact orders will be referred to appropriate student or employee conduct processes for enforcement.

Emergency Removal

Holy Family University can act to remove a student Respondent entirely or partially from its education program or activities on an emergency basis when an individualized safety and risk analysis has determined that an immediate threat to the physical health or safety of any student or other individual justifies removal. This risk analysis is performed by the Title IX Coordinator in conjunction with the Campus Assessment, Response and Evaluation (CARE) Team using its standard objective violence risk assessment procedures.

In all cases in which an emergency removal is imposed, the student/employee will be given notice of the action and the option to request to meet with the Title IX Coordinator prior to such action/removal being imposed, or as soon thereafter as reasonably possible, to show cause why the action/removal should not be implemented or should be modified. A Respondent may be accompanied by an Advisor of their choice when meeting with the Title IX Coordinator for

the show cause meeting. The Respondent will be given access to a written summary of the basis for the emergency removal prior to the meeting to allow for adequate preparation.

This meeting is not a hearing on the merits of the allegation(s), but rather is an administrative process intended to determine solely whether the emergency removal is appropriate. When this meeting is not requested in a timely manner, objections to the emergency removal will be deemed waived. A Complainant and their Advisor may be permitted to participate in this meeting if the Title IX Coordinator determines it is equitable to do so.

The Title IX Coordinator has sole discretion under this policy to implement or stay an emergency removal and to determine the conditions and duration. Violation of an emergency removal under this policy will be grounds for discipline, which may include expulsion. There is no appeal process for emergency removal decisions.

The University will implement the least restrictive emergency actions possible in light of the circumstances and safety concerns. As determined by the Title IX Coordinator, these actions could include, but are not limited to: removing a student from a residence hall, temporarily re-assigning an employee, restricting a student's or employee's access to or use of facilities or equipment, allowing a student to withdraw or take grades of incomplete without financial penalty, authorizing an administrative leave, and suspending a student's participation in extracurricular activities, student employment, student organizational leadership, or intercollegiate/intramural athletics.

At the discretion of the Title IX Coordinator, alternative coursework options may be pursued to ensure as minimal an academic impact as possible on the parties. This section also applies to any restrictions that a coach or athletic administrator may place on a student-athlete arising from allegations related to Title IX.

Where the Respondent is an employee, existing provisions for interim action are applicable.

Administrative Leave

Holy Family University retains the authority to place a non-student employee Respondent on administrative leave during the Title IX Grievance Process.

Investigation and Adjudication Procedures

Overview

Holy Family University will act on any formal or informal notice/complaint of violation of the policy on Sexual Harassment and Nondiscrimination that is received by the Title IX Coordinator or any other Official with Authority.

Title IX Grievance Process apply **only** to qualifying allegations of sexual harassment (including sexual assault, dating violence, domestic violence, and stalking, as defined above) involving students, staff, administrator, or faculty members. This Process can also apply to sexual harassment (including sexual assault, dating violence, domestic violence, and stalking, as defined above) when jurisdiction does not fall within this Process, as determined by the Title IX Coordinator.

Filing a Formal Complaint

The timeframe for the Title IX Grievance Process begins with the filing of a Formal Complaint. The Grievance Process will be concluded within a reasonably prompt manner, and no longer than ninety (90) calendar days after the filing of the Formal Complaint, provided that the Process may be extended for a good reason, including but not limited to the absence of a party, a party's advisor, or a witness; concurrent law enforcement activity; or the need for language assistance or accommodation of disabilities.

Initial Assessment

Following receipt of notice or a complaint of an alleged violation, the Title IX Coordinator engages in an initial assessment, typically within one to five business days.

Determining Jurisdiction

The Title IX Coordinator will determine if the instant Title IX Grievance Process should apply to a Formal Complaint.

Mandatory Dismissal

If any one of these elements are not met, the Title IX Coordinator will notify the parties that the Formal Complaint is being dismissed for the purposes of the Title IX Grievance Policy. Each party may appeal this dismissal using the procedure outlined below.

Discretionary Dismissal

The Title IX Coordinator may dismiss a Formal Complaint brought under the Title IX Grievance Policy, or any specific allegations raised within that Formal Complaint, at any time during the investigation or hearing.

Notice of Dismissal

Upon reaching a decision that the Formal Complaint will be dismissed, the institution will promptly send written notice of the dismissal of the Formal Complaint or any specific allegation within the Formal Complaint, and the reason for the dismissal, simultaneously to the parties through their institutional email accounts.

Right to an Advisor

The parties may each have an Advisor of their choice present with them for all meetings, interviews, and hearings within the resolution process, if they so choose. The parties may select whoever they wish to serve as their Advisor as long as the Advisor is eligible and available.

Notice of Allegations

The Title IX Coordinator will draft and provide the Notice of Allegations to any party to the allegations of

sexual harassment. Such notice will occur as soon as practicable, after the institution receives a Formal Complaint of the allegations, if there are no extenuating circumstances.

Notice of Meetings and Interviews

Holy Family University will provide, to a party whose participation is invited or expected, written notice of the date, time, location, participants, and purpose of all hearings, investigative interviews, or other meetings with a party, with sufficient time for the party to prepare to participate.

Resolution Processes

Resolution proceedings are private. All persons present at any time during the resolution process are expected to maintain the privacy of the proceedings in accordance with University policy. Although there is an expectation of privacy around what Investigators share with parties during interviews, the parties have discretion to share their own knowledge and evidence with others if they so choose, with the exception of information the parties agree not to disclose related to Informal Resolution, discussed below.

Informal Resolution

To initiate Informal Resolution, a Complainant needs to submit a formal complaint, as defined above. A Respondent who wishes to initiate Informal Resolution should contact the Title IX Coordinator.

It is not necessary to pursue Informal Resolution first in order to pursue a Formal Grievance Process, and any party participating in Informal Resolution can stop the process at any time and begin or resume the Formal Grievance Process.

Prior to implementing Informal Resolution, the University will provide the parties with written notice of the reported misconduct and any sanctions or measures that may result from participating in such a process, including information regarding any records that will be maintained or shared by the University.

The University will obtain voluntary, written confirmation that all parties wish to resolve the matter through Informal Resolution before proceeding and will not pressure the parties to participate in Informal Resolution.

Respondent Accepts Responsibility for Alleged Violations

The Respondent may accept responsibility for all or part of the alleged policy violations at any point during the resolution process. If the Respondent indicates an intent to accept responsibility for all of the alleged misconduct, the formal process will be paused, and the Title IX Coordinator will determine whether Informal Resolution can be used according to the criteria above.

If Informal Resolution is applicable, the Title IX Coordinator will determine whether all parties and the University are able to agree on responsibility, sanctions, and/or remedies. If so, the Title IX Coordinator implements the accepted finding that the Respondent is in violation of University policy and implements agreed-upon sanctions and/or remedies, in coordination with other appropriate administrator(s), as necessary.

This result is not subject to appeal once all parties indicate their written assent to all agreed upon terms of resolution. When the parties cannot agree on all terms of resolution, the Formal Grievance Process will resume at the same point where it was paused.

When a resolution is accomplished, the appropriate sanction or responsive actions are promptly implemented in order to effectively stop the harassment or discrimination, prevent its recurrence,

and remedy the effects of the discriminatory conduct, both on the Complainant and the community.

Negotiated Resolution

The Title IX Coordinator, with the consent of the parties, may negotiate and implement an agreement to resolve the allegations that satisfies all parties and the University. Negotiated Resolutions are not appealable.

Resolution Timeline

Holy Family University will make a good faith effort to complete the resolution process within a sixty-to-ninety (60-90) business day time period which can be extended as necessary for appropriate cause by the Title IX Coordinator, who will provide notice and rationale for any extensions or delays to the parties as appropriate, as well as an estimate of how much additional time will be needed to complete the process.

Appointment of Investigators

Once the decision to commence a formal investigation is made, the Title IX Coordinator appoints persons to conduct the investigation, typically using a team of two Investigators, usually within two (2) business days of determining that an investigation should proceed.

The Title IX Coordinator will vet the assigned Investigator(s) to ensure impartiality by ensuring there are no actual or apparent conflicts of interest or disqualifying biases. The parties may, at any time during the resolution process, raise a concern regarding bias or conflict of interest, and the Title IX Coordinator will determine whether the concern is reasonable and supportable. If so, another person will be assigned and the impact of the bias or conflict, if any, will be remedied.

The University reserves the right to exercise the utilization of external Investigators where it deems necessary or required. External Investigators will be held to the same training, bias and conflict of interest standards.

Impartiality

The Formal Grievance Process involves an objective evaluation of all relevant evidence obtained, including evidence that supports that the Respondent engaged in a policy violation and evidence that supports that the Respondent did not engage in a policy violation. Credibility determinations may not be based solely on an individual's status or participation as a Complainant, Respondent, or Witness. The University operates with the presumption that the Respondent is not responsible for the reported misconduct unless and until the Respondent is determined to be responsible for a policy violation by the applicable standard of proof.

Standard of Proof

Holy Family University uses the preponderance of the evidence standard investigations and determinations regarding responsibility of formal complaints covered under this Policy. This means that the investigation and hearing determine whether it is more likely than not that a violation of the Policy occurred.

Investigation Process

Investigations are completed expeditiously, normally within thirty (30) business days, though some investigations may take weeks or even months, depending on the nature, extent, and complexity of the allegations, availability of witnesses, police involvement, etc.

The University will make a good faith effort to complete investigations as promptly as circumstances permit and will communicate regularly with the parties to update them on the progress and timing of the

investigation.

All investigations are thorough, reliable, impartial, prompt, and fair. Investigations involve interviews with all relevant parties and witnesses; obtaining available, relevant evidence; and identifying sources of expert information, as necessary.

All parties have a full and fair opportunity, through the investigation process, to suggest witnesses and questions, to provide evidence and expert witnesses, and to fully review and respond to all evidence on the record.

Holy Family University, not the parties, has the burden of proof and the burden of gathering evidence, i.e. the responsibility of showing a violation of this Policy has occurred. This burden does not rest with either party, and either party may decide not to share their account of what occurred or may decide not to participate in an investigation or hearing. This does not shift the burden of proof away from the University and does not indicate responsibility.

No unauthorized audio or video recording of any kind is permitted during investigation meetings. If Investigators elect to audio and/or video record interviews, all involved parties must be made aware of and consent to audio and/or video recording.

The Investigators typically take the following steps, if not already completed (not necessarily in this order):

- Determine the identity and contact information of the Complainant.
- In coordination with campus partners (e.g., the Title IX Coordinator), initiate or assist with any necessary supportive measures.
- Commence a thorough, reliable, and impartial investigation by identifying issues and developing a strategic investigation plan, including a witness list, evidence list, intended investigation timeframe, and order of interviews for all witnesses and the parties.
- Meet with the Complainant to finalize their interview/statement, if necessary.
- Prepare the initial Notice of Investigation and Allegation (NOIA). The NOIA may be amended with any additional or dismissed allegations.
 - Notice should inform the parties of their right to have the assistance of an Advisor, who could be a member of the University-provided pool or an Advisor of their choosing, present for all meetings attended by the party
- Provide each interviewed party and Witness an opportunity to review and verify the Investigator's summary notes (or transcript) of the relevant evidence/testimony from their respective interviews and meetings.
- Make good faith efforts to notify the parties of any meeting or interview involving the other party, in advance when possible.
- When participation of a party is expected, provide that party with written notice of the date, time, and location of the meeting, as well as the expected participants and purpose.
- Interview all available, relevant witnesses and conduct follow-up interviews as necessary.
- Allow each party the opportunity to suggest witnesses and questions they wish the Investigator(s) to ask of the other party and witnesses, and document in the report which questions were asked, with a rationale for any changes or omissions.
- Complete the investigation promptly and without unreasonable deviation from the intended timeline
- Provide regular status updates to the parties throughout the investigation.
- Prior to the conclusion of the investigation, provide the parties and their respective Advisors (if so desired by the parties) with a list of witnesses whose information will be used to render a finding

- Write a comprehensive investigation report fully summarizing the investigation, all witness interviews, and addressing all relevant evidence. Appendices including relevant physical or documentary evidence will be included.
- The Investigators gather, assess, and synthesize evidence, but make no conclusions, engage in no policy analysis, and render no recommendations as part of their report.
- Prior to the conclusion of the investigation, provide the parties and their respective Advisors (if so desired by the parties) a secured electronic or hard copy of the draft investigation report as well as an opportunity to inspect and review all of the evidence obtained as part of the investigation that is directly related to the reported misconduct, including evidence upon which the Recipient does not intend to rely in reaching a determination, for a ten (10) business day review and comment period so that each party may meaningfully respond to the evidence. The parties may elect to waive the full ten days. Each copy of the materials shared will be watermarked on each page with the role of the person receiving it (e.g., Complainant, Respondent, Complainant's Advisor, Respondent's Advisor).
- The Investigators may elect to respond in writing in the investigation report to the parties' submitted responses and/or to share the responses between the parties for additional responses.
- The Investigators will incorporate relevant elements of the parties' written responses into the final investigation report, include any additional relevant evidence, make any necessary revisions, and finalize the report. The Investigators should document all rationales for any changes made after the review and comment period.
- The Investigator shares the report with the Title IX Coordinator for their review and feedback.
- The Investigator will incorporate any relevant feedback, and the final report is then shared with all parties and their Advisors through secure electronic transmission or hard copy at least ten (10) business days prior to a hearing. The parties are also provided with a file of any directly related evidence that was not included in the report.

Witnesses (as distinguished from the parties) who are employees of the University are expected to cooperate with and participate in the University's investigation and resolution process. Failure of such witnesses to cooperate with and/or participate in the investigation or resolution process constitutes a violation of policy and may warrant discipline.

Although in-person interviews for parties and all potential witnesses are ideal, circumstances (e.g., study abroad, summer break) may require individuals to be interviewed remotely. Skype, Zoom, FaceTime, WebEx, or similar technologies may be used for interviews if the Investigator(s) determine that timeliness or efficiency dictate a need for remote interviewing. The Recipient will take appropriate steps to reasonably ensure the security/privacy of remote interviews.

Witnesses may also provide written statements in lieu of interviews or choose to respond to written questions, if deemed appropriate by the Investigator(s), though not preferred. If a witness submits a written statement but does not intend to be and is not present for cross examination at a hearing, their written statement may not be used as evidence.

Live Hearing Process

Provided that the complaint is not resolved through Informal Resolution, once the final investigation report is shared with the parties, the Title IX Coordinator will refer the matter for a live hearing.

The hearing cannot be less than ten (10) business days from the conclusion of the investigation –when the final investigation report is transmitted to the parties and the Decision-maker—unless all parties and the Decision-maker agree to an expedited timeline.

The Title IX Coordinator will select an appropriate Decision-maker depending on whether the

Respondent is an employee or a student. The University reserves the right to exercise the utilization of an external Decision-maker where it deems necessary or required. A Decision-maker will be held to the same standard of training.

The University will not issue a disciplinary sanction arising from an allegation of covered sexual harassment without holding a live hearing unless otherwise resolved through an Informal Resolution process.

The live hearing may be conducted with all parties physically present in the same geographic location, or, at the University's discretion, any or all parties, witnesses, and other participants may appear at the live hearing virtually through remote video conferencing options. This technology will enable participants simultaneously to see and hear each other. At its discretion, the University may delay or adjourn a hearing based on technological errors not within a party's control. All proceedings will be recorded through audio recording, audiovisual recording, and transcript. That recording and transcript will be made available to the parties for inspection and review.

The University may determine those multiple sessions or a continuance (i.e. a pause on the continuation of the hearing until a later date or time) is needed to complete a hearing. If so, the University will notify all participants and endeavor to accommodate all participants' schedules and complete the hearing as promptly as practicable.

As a general rule, no new evidence or witnesses may be submitted during the live hearing. If a party identifies new evidence or witnesses that were not reasonably available prior to the live hearing and could affect the outcome of the matter, the party may request that such evidence or witnesses be considered at the live hearing.

The Decision-maker will consider this request and make a determination regarding (1) whether such evidence or witness testimony was actually unavailable by reasonable effort prior to the hearing, and (2) whether such evidence or witness testimony could affect the outcome of the matter. The party offering the newly-discovered evidence or witness has the burden of establishing these questions by the preponderance of the evidence. If the Decision-maker answers in the affirmative to both questions, then the parties will be granted a reasonable pause in the hearing to review the evidence or prepare for questioning of the witness.

Live hearings are not public, and the only individuals permitted to participate in the hearing are as follows:

Complainant and Respondent (The Parties)

- The parties cannot waive the right to a live hearing.
- The institution may still proceed with the live hearing in the absence of a party, and may reach a determination of responsibility in their absence.
- Holy Family University will not threaten, coerce, intimidate or discriminate against the party in an attempt to secure the party's participation.
- The decision-maker cannot draw an inference about the determination regarding responsibility based solely on a party's absence from the live hearing or refusal to answer cross examination or other questions.

Hearing Facilitator

- Facilitator is the process administrator and as no decision-making role
- The Facilitators assures the hearing is conducted according to outlined procedural expectations.
- At the hearing, recording, witness logistics, party logistics, curation of documents, separation of the parties, and other administrative elements of the hearing process are

managed by a non-voting Hearing Facilitator appointed by the Title IX Coordinator.

- The Hearing Facilitator may attend to: logistics of rooms for various parties/witnesses as they wait; flow of parties/witnesses in and out of the hearing space; ensuring recording and/or virtual conferencing technology is working as intended; copying and distributing materials to participants, as appropriate, etc.
- The Title IX Coordinator, or their designee, may serve in this role.

The Decision-maker

- The hearing body will consist of a single decision-maker
- The Decision-maker will not have served as the Title IX Coordinator, Title IX investigator, or Advisor to any party in the case, nor may any member of the Decision-maker serve on the appeals body in the case.
- The Decision-maker will not have a conflict of interest or bias in favor of or against complainants or respondents generally, or in favor or against the parties to the particular case.
- The Decision-maker will be trained on topics including how to serve impartially, issues of relevance, including how to apply the rape shield protections provided for complainants, and any technology to be used at the hearing.
- The parties will have an opportunity to raise any objections regarding a Decision-maker's actual or perceived conflicts of interest or bias at the commencement of the live hearing.
- The University reserves the right to exercise the utilization of an external Decision-maker where it deems necessary or required.

Advisor

- The parties have the right to select an advisor of their choice, who may be, but does not have to be, an attorney.
- The advisor of choice may accompany the parties to any meeting or hearing they are permitted to attend, but may not speak for the party, except for the purpose of cross-examination.
- In addition to selecting an advisor to conduct cross-examination, the parties may select an advisor who may accompany the parties to any meeting or hearing they are permitted to attend, but may not speak for the party.
- The parties are not permitted to conduct cross-examination; it must be conducted by the advisor. As a result, if a party does not select an advisor, the institution will select an advisor to serve in this role for the limited purpose of conducting the cross-examination at no fee or charge to the party.
- The advisor is not prohibited from having a conflict of interest or bias in favor of or against complainants or respondents generally, or in favor or against the parties to the particular case.
- The advisor is not prohibited from being a witness in the matter.
- If a party does not attend the live hearing, the party's advisor may appear and conduct cross-examination on their behalf.
- If neither a party nor their advisor appear at the hearing, Holy Family University will provide an advisor to appear on behalf of the non-appearing party.

Witnesses

- Witnesses cannot be compelled to participate in the live hearing, and have the right not to participate in the hearing free from retaliation.

Live Hearing Procedures

For all live hearings conducted under this Title IX Grievance Process, the procedure will be as follows:

- Decision-maker will open and establish rules and expectations for the hearing;

- The Parties will each be given the opportunity to provide opening statements;
- Investigator presents the Final Investigation Report;
- Decision-maker may ask questions of the Investigator(s);
- The Parties will each be given the opportunity to provide opening statements;
- Decision-maker will ask questions of the Parties and Witnesses; and
- Parties will be given the opportunity for live cross-examination after the Decision-maker conducts its initial round of questioning; During the Parties' cross-examination, the Decision-maker will have the authority to pause cross-examination at any time for the purposes of asking own follow up questions; and any time necessary in order to enforce the established rules of decorum.
- Should a Party or the Party's Advisor choose not to cross-examine a Party or Witness, the Party shall affirmatively waive cross-examination through a written or oral statement to the Decision-maker. A Party's waiver of cross-examination does not eliminate the ability of the Decision-maker to use statements made by the Party.

The Investigator(s) will present a summary of the Final Investigation Report, including items that are contested and those that are not, and may be subject to questioning by the Decision-maker. The Investigator(s) presence at the hearing will be limited to presentation of the investigation report and questioning by the Decision-maker and Parties. Neither the parties nor the Decision-maker should ask the Investigator(s) their opinions on credibility, recommended findings or determinations, and Advisors and parties will refrain from discussion of or questions about these assessments. If such information is introduced, the Chair will direct that it be disregarded. Each party's Advisor will conduct live cross-examination of the other party or parties and witnesses. During this live-cross examination the Advisor will ask the other party or parties and witnesses relevant questions and follow-up questions, including those challenging credibility directly, orally, and in real time.

Before any cross-examination question is answered, Hearing Board Chair will determine if the question is relevant. Cross-examination questions that are duplicative of those already asked, including by the Decision-maker, may be deemed irrelevant if they have been asked and answered.

Questions and evidence about the Complainant's sexual predisposition or prior sexual behavior are not relevant, unless such questions and evidence about the Complainant's prior sexual behavior are offered to prove that someone other than the Respondent committed the conduct alleged by the Complainant, or if the questions and evidence concern specific incidents of the Complainant's prior sexual behavior with respect to the Respondent and are offered to prove consent.

The recording of the hearing will be available for review by the parties within three (3) business days, unless there are any extenuating circumstances. A copy of the recording of the hearing will not be provided to parties or advisors of choice under any circumstances.

Determination Regarding Responsibility

The Decision-maker will deliberate in a closed session to determine whether the Respondent is responsible or not responsible for the policy violation(s) in question. The Hearing Facilitator may be invited to attend the deliberation by the Decision-maker, but is there only to facilitate procedurally, and not to address the substance of the allegations.

After post-hearing deliberation, the Decision-maker renders a determination based on the preponderance of the evidence; whether it is more likely than not that the Respondent violated the Policy as alleged.

The Decision-maker will ensure that each of the parties has an opportunity to review any impact statement submitted by the other party(ies). The Decision-maker may – at their discretion – consider the statements, but they are not binding.

The Decision-maker will prepare a written deliberation statement and deliver it to the Title IX Coordinator, detailing the determination, rationale, the evidence used in support of its determination, the evidence not relied upon in its determination, and credibility assessments.

This report is typically three (3) to five (5) pages in length and must be submitted to the Title IX Coordinator within seven (7) business days of the end of deliberations, unless the Title IX Coordinator grants an extension. If an extension is granted, the Title IX Coordinator will notify the parties.

Sanctions

When there is a finding of responsibility on one or more of the allegations, the Title IX Coordinator, or their designee, will determine appropriate sanction(s).

Previous disciplinary action of any kind involving the Respondent may be considered in determining an appropriate sanction upon a determination of responsibility. This information is only considered at the sanction stage of the process, and is not shared until that time.

When there is a finding of responsibility on one or more of the allegations, the Title IX Coordinator may then consider the previously submitted party impact statements in determining appropriate sanction(s).

Factors considered when determining a sanction/responsive action may include, but are not limited to:

- The nature, severity of, and circumstances surrounding the violation(s)
- The Respondent's disciplinary history
- Previous allegations or allegations involving similar conduct
- The need for sanctions/responsive actions to bring an end to the discrimination, harassment, and/or retaliation
- The need for sanctions/responsive actions to prevent the future recurrence of discrimination, harassment, and/or retaliation
- The need to remedy the effects of the discrimination, harassment, and/or retaliation on the Complainant and the community
- The impact on the parties
- Any other information deemed relevant by the Decision-maker

The sanctions will be implemented as soon as is feasible, either upon the outcome of any appeal or the expiration of the window to appeal without an appeal being requested.

The sanctions described in this policy are not exclusive of, and may be in addition to, other actions taken or sanctions imposed by external authorities.

Notice of Outcome

The written Determination Regarding Responsibility will be issued simultaneously to all parties through their institution email account, or other reasonable means as necessary. The Determination will include:

1. Identification of the allegations potentially constituting covered sexual harassment;
2. A description of the procedural steps taken from the receipt of the formal complaint through the determination, including any notifications to the parties, interviews with parties and witnesses, site visits, methods used to gather other evidence, and hearings held;
3. Findings of fact supporting the determination;
4. Conclusions regarding which section of the Sexual Harassment and Nondiscrimination Policy, if any, the respondent has or has not violated.
5. For each allegation:
 - a. A statement of, and rationale for, a determination regarding responsibility;
 - b. A statement of, and rationale for, any disciplinary sanctions the recipient imposes on the respondent; and

- c. A statement of, and rationale for, whether remedies designed to restore or preserve equal access to the recipient's education program or activity will be provided by the recipient to the complainant; and
6. The recipient's procedures and the permitted reasons for the complainant and respondent to appeal.

All Respondents are expected to comply with the assigned sanctions, responsive actions, and/or corrective actions within the timeframe specified by the final Decision-maker.

Failure to abide by the sanction(s)/action(s) imposed by the date specified, whether by refusal, neglect, or any other reason, may result in additional sanction(s)/action(s), including suspension, expulsion, and/or termination from the University.

A suspension will only be lifted when compliance is achieved to the satisfaction of the Title IX Coordinator.

Timeline of Determination Regarding Responsibility

If there are no extenuating circumstances, the determination regarding responsibility will be issued by Holy Family University within ten (10) business days of the completion of the hearing.

Finality

The determination regarding responsibility becomes final either on the date that the institution provides the parties with the written determination of the result of the appeal, if an appeal is filed consistent with the procedures and timeline outlined below, or if an appeal is not filed, the date on which the opportunity to appeal expires.

Appeals

Any party may file a Request for Appeal, but it must be submitted in writing to the Title IX Coordinator within seven (7) business days of the delivery of the Notice of Outcome.

A three-member appeal panel will be designated by the Title IX Coordinator. The Request for Appeal will be forwarded to the Appeal Chair for consideration to determine if the request meets the grounds for appeal (a Review for Standing).

This review is not a review of the merits of the appeal, but solely a determination as to whether the request meets the grounds and is timely filed.

Appeals are limited to the following grounds:

- A. Procedural irregularity that affected the outcome of the matter;
- B. New evidence that was not reasonably available at the time the determination regarding responsibility or dismissal was made, that could affect the outcome of the matter; and
- C. The Title IX Coordinator, Investigator(s), or Decision-maker had a conflict of interest or bias for or against Complainants or Respondents generally or the specific Complainant or Respondent that affected the outcome of the matter.

If any of the grounds in the Request for Appeal do not meet the grounds in this Policy, that request will be denied by the Appeal Chair and the parties and their Advisors will be notified in writing of the denial and the rationale.

If any of the grounds in the Request for Appeal meet the grounds in this Policy, then the Appeal Chair will notify the other party(ies) and their Advisors, the Title IX Coordinator, and, when appropriate, the Investigators and/or the original Decision-maker.

The submission of appeal stays any sanctions for the pendency of an appeal. Supportive measures and remote learning opportunities remain available during the pendency of the appeal.

Outcome of appeal will be provided in writing simultaneously to both parties, and include rationale for the decision.

Understanding Rights

Holy Family University strives to provide members of the campus community with fair and equitable resolution processes. We are committed to a treatment of care and support, and students will be encouraged to speak with the University Counseling Center in an effort to help navigate the process. The University has a list of available off-campus support services and resource agencies that are provided to students. The University will consult with students before moving on to a formal investigation. The University will do its best to support a students' decision, if they choose to request to report anonymously. University officials must evaluate requests for confidentiality with our obligation to provide a safe environment for all community members. The University is committed to remedying any situation brought to its attention, ending discriminatory behaviors, and in limiting impact to our campus community.

The University strives to be fair in the handling of allegations of sexual misconduct. All students have the right to due process, meaning they have the right to be notified of the allegations and an opportunity to respond to them. We also assure that our students' understand their right to information regarding the university's investigation and adjudication process. Questions concerning these procedures can be addressed to the Title IX Coordinator.

Sex Offender Registration Policy

The federal Campus Sex Crimes Prevention Act went into effect on October 28, 2002. The law requires institutions of higher education to issue a statement advising the campus community where state law-enforcement agency information concerning registered sex offenders may be obtained. It also requires that sex offenders already registered in a state provide notice to each institution of higher education in the state as to where the person is employed, carries on a vocation, or is a student.

Information regarding registered sex offenders on campus of Holy Family University may be obtained from the following:

Philadelphia Police Department 1 Franklin Square
Philadelphia, PA 19106
(215) 686-1776

Newtown Township Police Department 100 Municipal Drive
Newtown, PA 18940
(215) 598-7121

<http://www.pameganslaw.state.pa.us>

Hate Crimes

The law requires the release of statistics by category of prejudice concerning the occurrence of hate crimes in the crime classifications listed in the “Clery Act” and for other crimes involving bodily injury to any person in which the victim is selected because of the actual or perceived race, gender, gender identity, religion, sexual orientation, ethnicity, national origin or disability of the victim.

In August of 2008, HEOA S 488, 20 U.S.C.S 1092 (f) (1) F (iii) modified the above hate crimes to include the following additional crimes under the hate crime category:

- Larceny Theft: The unlawful taking, carrying, leading, or riding away of property from the possession, or constructive possession;
- Threat: To unlawfully place another person in reasonable fear of bodily harm through the use of threatening words and/or other conduct, but without display of a weapon or subjecting the victim to actual physical attack;
- Intimidation: 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;
- Destruction/Damage/Vandalism of Property: 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;
- Simple Assault: 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.

As stated in the *Student Handbook*:

Hate crimes occur when a perpetrator targets a victim because of his or her perceived membership in a certain social group, usually defined by race, age, color, religion, national origin, ethnic origin, sex/gender, sexual orientation, disability, marital status, military leave, veteran status and any other status protected by law, which unreasonably disrupts or interferes with another’s academic performance, or which creates an intimidating, offensive or hostile environment.

The law requires the release of statistics by category of prejudice concerning the occurrence of hate crimes in the crime classifications listed in the Clery Act such as race, gender, religion, sexual orientation, ethnicity or national origin, disabilities and for other crimes involving bodily injury to any person. Definitions listed in the *Handbook for Campus Safety and Security Reporting* includes:

- Race: A preformed negative attitude toward a group of persons who possess common physical and hereditary characteristics;
- Gender: A preformed negative opinion or attitude toward a group of persons because those persons are male or female;
- Gender Identity: A preformed negative opinion or attitude toward a group of persons based on their actual or perceived gender identity, e.g. bias against transgender or gender non-conforming individuals;
- Religion: A preformed negative opinion or attitude toward a group of persons who share the same religious beliefs regarding the origin and purpose of the universe and the existence or non-existence of a supreme being;
- Sexual Orientation: A preformed negative opinion or attitude toward a group of persons

based on their sexual attraction toward, and responsiveness to, members of their own sex or members of the opposite sex;

- Ethnicity: A preformed negative opinion or attitude toward a group of persons whose members identify with each other through common heritage, often consisting of a common language common culture (often including a shared religion) and/or ideology that stresses common ancestry. The concept of ethnicity differs from the closely related term race in that “race” refers to grouping based mostly upon biological criteria, while “ethnicity” also encompasses additional cultural factors.
- National Origin: A preformed negative opinion or attitude toward a group of persons of the same race or national origin who share common or similar traits, languages, customs and/or traditions;
- Disability: A preformed negative opinion or attitude toward a group of persons based on their physical or mental impairments/challenges, whether such a disability is temporary or permanent, congenital or acquired by heredity, accident, injury, advanced age or illness.

Missing Student Notification Procedure

The Holy Family University Department of Public Safety thoroughly investigates all persons, including students reported as missing whether they reside on or off campus. Students and employees are instructed to report a missing person, dial 3333 from a campus phone, use one of the blue light emergency phones on campus, or call (267) 341-3333 from off-campus/cell phones. They can also report a missing person in person at the Department of Public Safety in the Campus Center building, which is staffed with professional personnel, 24/7. Additionally, all persons may request assistance from a Public Safety Officer on patrol or call 911. Personal information will be kept confidential.

If the missing person is a student, Public Safety will follow these procedures:

- The Asst. V.P. for Public Safety or Shift Supervisor, upon confirmation that a student is missing and cannot be located, shall notify the Dean of Students.
- If the missing student resides in on-campus housing, the Asst. V.P. for Public Safety or designee will notify the Director for Residence Life. If the missing student residing on campus has been missing for more than 24 hours, the student's designated emergency and/or confidential contact if so designated will be notified. All information is maintained in the university's ID card and related systems and is held confidential and is only accessible by authorized campus officials. The Philadelphia or Newtown Police Department will also be notified.
- If a student is under 18, the Dean of Students, or their designees, will immediately notify the custodial parent or legal guardian. The missing student will be reported to the appropriate Police Department within 24 hours.
- If a student over 18 has not designated an emergency contact, the law enforcement agency where the student's primary residence is located will be notified. All notifications as mentioned in this section will be made by the Dean of Students, or their designee.

Annual Fire Safety Report

The Higher Education Opportunity Act (HEOA) requires two (2) safety-related requirements of institutions that participate in federal student financial aid programs which follow:

- **Fire Log:** Institutions must keep a fire log that states the nature of the fire, date, time and general location of each fire in on-campus student housing facilities. On-campus student housing facilities are only available at the Northeast Philadelphia campus. Holy Family University complies with this rule by including all fire-related incidents in the Daily Crime and Fire Log. To view the most recent seven days of information, please visit the Public Safety Department Command Center. Requests for information older than 60 days must be directed to the Asst. V.P. for Public Safety. Information will be made available within two business days of a request for public inspection.
- **Annual Fire Safety Report:** Institutions with on-campus student housing facilities must annually publish a fire safety report that provides information on campus fire safety practices and standards. Holy Family University complies with this regulation by including all fire-related incidents at on-campus student housing facilities as part of the Annual Security and Fire Safety Report. Periodically throughout the academic year, each residential living facility practices two Fire Evacuations per semester. Public Safety Officers educate the residential students during annual new student orientations as well as during various Residential All-Hall/Floor meetings. Commuter students and employees are notified via the campus email regarding policies and locations for fire/building evacuations during each academic semester. Safety of the campus community is upheld through the various university policies regarding electronic appliances, smoking, and open flames within residential housing and the entire campus community.

Information contained in this annual fire safety report includes: number and cause of fires at all on campus student housing facilities; number of fire-related deaths; related injuries; value of fire-related property damage; information on evacuation procedures; fire safety education and training programs; fire safety systems in each student housing facility; number of regular mandatory supervised fire drills; and policies on portable electrical appliances; smoking; and open flames.

In the event of a fire, the university expects that all campus community members will evacuate by the nearest exit, closing doors and activating the fire alarm (if one is present) as they leave. Once safely outside a building, it is appropriate to contact 911 and the Public Safety Department. Students and/or staff are informed where to relocate to by staff if circumstance warrants at the time of the alarm. In the event the fire alarm sounds, university policy is that all occupants must evacuate from the building and closing doors as they leave. No training is provided to students or employees in firefighting or suppression activity as this is inherently dangerous. Each community member's only duty is to exit safely and quickly, shutting doors along the exit path. At no time should the closing of doors or the activation of the alarm delay the exit from the building.

Per federal law, Holy Family University is required to annually disclose statistical data on all fires that occur in on-campus student housing facilities. Listed below are the non-emergency numbers to call to report fires that have already been extinguished in on-campus student housing. These are fires for which you are unsure whether the Public

Safety Office may already be aware. If you find evidence of such a fire, or if you hear about such a fire, please contact one of the following:

- Holy Family University Public Safety Department – 267-341-3333
- Holy Family University Residence Life Office – 267-341-3204

When calling, please provide as much information as possible about the location, date, time, and cause of the fire.

PHILADELPHIA CAMPUS-FIRE SAFETY REPORT

Name of Facility	Categories	2022 CY	2021 CY	2020 CY	# of injuries	# of Deaths	Value of Property
St. Joseph's Hall	Fires	0	0	0	N/A	N/A	N/A
	Injuries	0	0	0	N/A	N/A	N/A
	Deaths	0	0	0	N/A	N/A	N/A
Stevenson Lane Residence	Fires	0	0	0	N/A	N/A	N/A
	Injuries	0	0	0	N/A	N/A	N/A
	Deaths	0	0	0	N/A	N/A	N/A
Garden Apartments	Fires	0	0	0	N/A	N/A	N/A
	Injuries	0	0	0	N/A	N/A	N/A
	Deaths	0	0	0	N/A	N/A	N/A
Totals	Fires	0	0	0	N/A	N/A	N/A
	Injuries	0	0	0	N/A	N/A	N/A
	Deaths	0	0	0	N/A	N/A	N/A

THE ADDRESS FOR ALL BUILDINGS IS 9801 FRANKFORD AVE. PHILA. PA. 19114

There are no residential facilities offered at the Newtown Campus.

PHILADELPHIA CAMPUS FIRE SAFETY SYSTEMS IN RESIDENTIAL FACILITIES

Facility	Fire Alarm Monitoring Done on Site by Public Safety	Partial #1 Sprinkler System	Full #2 Sprinkler System	Smoke Detection	Fire Extinguisher Devices	Evacuation Plans & Placards	Number of Evacuation (Fire) Drills Each Calendar Year
Stevenson Lane Residence	Yes	N/A	Yes	Yes	Yes	Yes	2
St. Joseph's Hall	Yes	N/A	Yes	Yes	Yes	Yes	2
Garden Apartments	Yes	N/A	Yes	Yes	Yes	Yes	2

Evacuation Chair

If a student/staff is on a level of a building in which s/he does not have direct outside access and must use the stairs, an evacuation chair will be used. Instructions are as follows: go to the stored location of the evacuation chairs and bring chair to student in need. Evacuation chairs are located in various campus buildings (with more than one floor) in the following areas:

Philadelphia Campus

Holy Family Hall: 4th Floor, south stairwell Education & Technology Center:

4th Floor, north stairwell

Library: 2nd Floor, south stairwell

Nursing Education Building: 4th Floor, south stairwell St. Joseph's Hall: 3rd Floor, north stairwell Stevenson Lane Residence: 4th Floor, east stairwell

Newtown Site

2nd Floor, stairwell

Evacuation Plan for Students/Staff with Physical Disabilities

Philadelphia Campus

Upon Alarm Sounding-
Student Staff Response:

Dial 911 from an on-campus phone, which will connect directly with a dispatcher from the local emergency services department. A red phone may also be used, but the red phone will only connect the student/staff with Holy Family University Public Safety. If the student/staff is not able to get to a University-issued phone, the student/staff may use a cell phone to call 911.

Contact and inform Holy Family Public Safety at 267-341-3333 of the student/staff's position and give information on the emergency (e.g., fire alarm, a serious fall, etc.) and any immediate danger in which the student/staff finds him/herself. The student/staff will be instructed as to where to meet the Public Safety Officer/appropriate emergency services personnel.

If able, the student/staff will go to the designated spot that the emergency personnel have identified and await emergency response. If unable, the student/staff shall remain at the present location and await emergency personnel.

Newtown Campus

Upon Alarm Sounding-
Student Staff Response:

Dial 911 from an on-campus phone, which will connect directly with a dispatcher from the local emergency services department. A red phone may also be used, but the red phone will only connect the student/staff with Holy Family University Public Safety. If the student/staff is not able to get to a University-issued phone, the student/staff may use a cell phone to call 911.

Contact and inform Holy Family Public Safety at 267-341-4011 of student/staff's position and give information on the emergency (e.g., fire alarm, a serious fall, etc.) and any immediate danger in which the student/staff finds him/herself. The student/staff will be instructed as to where to meet the Public Safety Officer/appropriate emergency services personnel.

If able, the student/staff will go to the designated spot that the emergency personnel have identified and await emergency response. If unable, the student/staff shall remain at the present location and await emergency personnel.

Holy Family University Response

Answer and determine location of call from student/staff. Direct student/staff on where to meet the designated officer – please be specific. Go to the designated area and meet students/staff.

