

# Schiller International University



## 2022 ANNUAL SECURITY REPORT

### Introduction

This report is provided in compliance with the Jeanne Clery Disclosure of Campus Security Policy and Crime Statistics Act, as amended. It provides students and employees of Schiller International University ("University") with information on: the University's security arrangements, policies and procedures; programs that provide education on such things as drug and alcohol abuse, awareness of various kinds of sex offenses, and the prevention of crime generally; and procedures the University will take to notify the campus community in the event of an emergency. Its purpose is to provide students and employees with information that will help them make informed decisions relating to their own safety and the safety of others.

### Policy for Preparing the Annual Report

This report is prepared by the Campus Director in cooperation with local law enforcement authorities and includes information provided by them as well as by the University's campus security authorities and various other elements of the University. Each year an e-mail notification is made to all enrolled students and employees that provides the website link to access this report. Prospective students and employees are also notified of the report's availability. Hard copies of the report may also be obtained at no cost by contacting Aude Prebay, 55 Avenue Hoche, Paris, France, 75008. The University is committed to taking the actions necessary to provide a safe and secure working/learning environment for all students and staff. As a member of the campus community, you can feel safe and comfortable

knowing that security procedures are in place that represent best practices in the field, and are constantly tested and re-evaluated for their effectiveness.

## **General Safety and Security Policies**

### **Campus Security Personnel & Relationship with Local Law Enforcement**

The University does not have a campus security or police department.

While the University does not have any written agreements with local law enforcement agencies, it does maintain a close working relationship with local police.

### **Campus Security Authorities**

The University has designated certain officials to serve as campus security authorities. Reports of criminal activity can be made to these officials. They in turn will ensure that the crimes are reported for collection as part of the University's annual report of crime statistics. The campus security authorities to whom the University would prefer that crimes be reported are listed below.

- Local police station at Commissariat de Police Chaillot 4 Rue du Bouquet de Longchamp

### **Reporting a Crime or Emergency**

The University encourages accurate and prompt reporting of all criminal actions, emergencies, or other incidents occurring on campus, on other property owned by the University, or on nearby public property to the appropriate administrator and appropriate police agencies. Such a report is encouraged even when the victim of a crime elects not to make a report or is unable to do so.

- All crimes occurring on or near University property should be reported immediately to the Campus Security Department. The number to contact is \_\_\_112\_\_\_\_\_. A dispatcher is available 24/7.
- If a crime is in progress or there is some other situation posing imminent danger, local law enforcement can be reached by dialing 911.
- Students, staff, and visitors should also report situations to one of the campus security authorities identified above. Once reported, the individual may also be encouraged to report the situation to the appropriate police agency. If requested, a University staff member will assist in making the report to police.

### **Confidential Reporting**

The University will protect the confidentiality of victims. Only those with a need to know the identity for purposes of investigating the crime, assisting the victim or disciplining the perpetrator will know the victim's identity.

Pursuant to the University's sexual misconduct policy, when an employee who is not a confidential resource becomes aware of alleged misconduct under that policy (including, but not limited to, dating violence, domestic violence, sexual assault, and stalking), the employee is responsible for reporting that information, including the status of the parties if known, to the Title IX Coordinator. A victim of other types of crimes (e.g., aggravated assault, burglary, etc.) who does not want to pursue action within the University disciplinary system or the criminal justice system is nevertheless encouraged to make a confidential report to a campus security authority. Upon the victim's request, a report of the details of the incident can be filed with the University without revealing the victim's identity. Such a confidential report complies with the victim's wishes, but still helps the University take appropriate steps to ensure the future safety of the victim and others. With such information, the University can keep an accurate record of the number of incidents involving members of the campus community, determine where a pattern of crime may be developing and alert the community as to any potential danger. These confidential reports are counted and disclosed in the annual crime statistics for the University.

All crimes and incidents must be reported to the Campus Director or to a member of staff. Where a serious incident has taken place, the police, fire or ambulance must be called immediately on 112. For less serious incidents where there is no immediate physical danger, the Campus Director will decide the best course of action and how to inform local law enforcement if required. If a victim or witness wishes to report a crime on a voluntary, confidential basis, the victim or witness may do so by contacting the Campus Director who is also the Title IX coordinator. All efforts will be made to protect privacy and confidentiality. Crimes reported on a voluntary, confidential basis will be included in the annual crime statistics. Sexual assaults may be reported to anyone confidentially, allowing for posting of timely warnings and statistical data. The University does not provide pastoral care or counseling. The Campus Title IX Coordinator is Aude Prebay, the Campus Director. She receives annual training from the company Title IX Coordinator, Bernadette Bellas has over 8 years in Title IX experience. Contact information is available in the Employee Handbook, Website and Catalog. The Campus non-discrimination and Title IX grievance procedures are also published in these platforms.

The University does not employ any pastoral or professional counselors and thus does not have procedures for these positions to inform the persons they are counseling of any procedures to report crimes on a voluntary, confidential basis for inclusion in the annual disclosure of crime statistics.

### **Security of and Access to Campus Facilities**

All academic buildings are secured during the evenings and weekends. Access to the buildings is only allowed for faculty/staff members and students who are accompanied by faculty/staff members. The Campus facilities open officially every day Monday-Friday, from 08:00 to 18:00 (or 21:00 when there are classes taught). The campus building will be secured either by Campus Director or the appointed receptionist member of staff.

Students and employees are asked to be alert and to not circumvent practices and procedures that are meant to preserve their safety and that of others.

- Do not prop doors open or allow strangers into campus buildings that have been secured.
- Do not lend keys or access cards to non-students and do not leave them unattended.
- Do not give access codes to anyone who does not belong to the campus community.

Keys to the offices, laboratories, and classrooms on campus will be issued to employees only as needed and after receiving the proper authorization. Each department supervisor is responsible for assuring his/her area is secured and locked.

Employee and student identification cards may be used to verify the identity of persons suspected to be in campus facilities without permission.

Outside office hours the campus is protected by main iron gates at the main entrance to the building and two sets of glass doors. The concierge of the office building within which are located is also on site after hours (except on weekends). The concierge can be reached at +33 . No staff, students or faculty should be on campus at this time.

### **Security Considerations in the Maintenance of Facilities**

The Campus Security Department works with the Facilities Department to identify maintenance issues on campus that may be safety hazards. Safety checks are completed to identify street or safety lights that are not functioning properly, or to determine if shrubs or other landscaping might need trimming. Maintenance personnel regularly check to ensure there is adequate lighting on pathways and that egress lighting is working in hallways and stairwells.

Employee and student identification cards may be used to verify the identity of persons suspected to be in campus facilities without permission.

Outside office hours the campus is protected by main iron gates at the main entrance to the building and two sets of glass doors. The concierge of the office building within which are located is also on site after hours (except on weekends). The concierge can be reached at +33 661918846 . No staff, students or faculty should be on campus at this time.

### **Educational Programs Related to Security Awareness and Prevention of Criminal Activity**

The University seeks to enhance the security of its campus and the members of the campus community by periodically presenting educational programs to inform students and employees about campus security procedures and practices, to encourage students and employees to be responsible for their own security and the security of others and to inform them about the prevention of crimes. These programs are discussed below.

The University provides information at the beginning of each academic term for students and employees regarding the University's security procedures and practices. This information is in the form of posters and other displays, articles in the University newspaper, and email blasts. Among other things, it advises students and employees of the importance of reporting

criminal activity, to whom crimes should be reported, being responsible for their own safety and the safety of others and practices regarding timely warnings and emergency notifications.

Crime prevention programs are also presented each semester by Student Services and Student Academic Advisor in tandem with representatives of Student Council. In addition, email blasts are periodically sent out to students and employees with crime prevention and other safety tips, and pamphlets and videos on crime prevention are available in the Office of Student Services.

### **Monitoring Off Campus Locations of Recognized Student Organizations**

The University does not have any officially recognized student organizations with off campus locations and therefore does not monitor or record criminal conduct occurring at such locations.

### **Disclosure of the Outcome of a Crime of Violence or Non-Forcible Sex Offense**

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

The previous paragraph does not apply to victims of dating violence, domestic violence, sexual assault, or stalking because under the Violence Against Women Act both the accused and accuser in these cases are given the results without the need to make a written request.

## **Drug and Alcohol Policy**

The University is committed to creating and maintaining an environment that is free of alcohol abuse. The University prohibits the possession, use, and sale of alcohol beverage on campus or as any part of the University's activities, unless it is done so in accordance with applicable University policies, and it also enforces the state's underage drinking laws.

In keeping with the mission of Schiller International University and the requirements of state and federal laws, the university has adopted the following policy to ensure a drug-free campus and workplace, to prevent the use of controlled substances, and to prevent the abuse of alcohol. The use of illegal drugs and the abuse of alcohol on the SIU campus or in facilities controlled by SIU are prohibited. **CAMPUS DRUG POLICY** The university complies with the Drug-Free Workplace Act of 1988 and the Drug-Free Schools and Communities Act Amendments of 1989.

- The possession, use, manufacture, or distribution of any illegal drug is prohibited on property owned or controlled by the university.
- Reporting for work, attendance by a student at any class, or attendance by either a student or employee at any activity of the university under the influence of any controlled substance is

prohibited. Violation of any of the prohibitions may result in immediate dismissal and/or criminal charges according to state and federal law.

#### ENFORCING THE CAMPUS DRUG POLICY

The Campus Security Officials are not a police force and has no arrest authority. Campus Security Officials are authorized to contact local law enforcement to report violations of law. Campus Security Officials can also refer violations of Federal and State Law and university policy to the appropriate administrators for potential disciplinary action.

#### ALCOHOL POLICY

Schiller encourages safe, responsible behavior toward alcohol. All students are personally responsible for their behavior, and all students should, consider themselves responsible for the safety of themselves and all fellow students. The following policies are in place to support healthy decisions and encourage responsible behavior:

- The possession, use, consumption, manufacture, sale, or distribution of alcohol by anyone under the age of 18 is strictly prohibited and could result in both criminal charges in accordance to local law and university judicial proceedings in accordance with the student code of conduct.

#### ENFORCING THE ALCOHOL POLICY

The Campus Security Officials are not a police force and has no arrest authority. Campus Security Officials are authorized to contact local law enforcement to report violations of law. Campus Security Officials can also refer violations of Federal and State Law and university policy to the appropriate administrators for potential disciplinary action.

#### FRENCH LAW: PERTAINING TO USE OF DRUGS AND ILLEGAL SUBSTANCES

Students must respect French law concerning the use of drugs as outlined in the French Public Health Code Article L.3421-1 which prohibits the consumption of drugs classified as illegal by the National Agency for the Security of Medications and Health Products (ANSM). Such violations are punishable by a fine of 3,750.00€ and up to one year in prison.

The University also enforces federal and state drug laws. The possession, sale, manufacture or distribution of illegal drugs is prohibited on campus or as any part of the University's activities. Violators of the University's policies or federal and state laws regarding illegal drugs will be subject to disciplinary action and possibly criminal prosecution.

**ENFORCING THE ALCOHOL POLICY** The Campus Security Officials are not a police force and has no arrest authority. Campus Security Officials are authorized to contact local law enforcement to report violations of law. Campus Security Officials can also refer violations of Federal and State Law and university policy to the appropriate administrators for potential disciplinary action.

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### **Federal Drug Laws** (updated 08.04.2022)

**Denial of Federal Benefits (21 U.S.C. § 862)** A federal drug conviction may result in the loss of federal benefits, including school loans, grants, scholarships, contracts, and licenses. Federal drug trafficking convictions may result in denial of federal benefits for up to five years for a first conviction. Federal drug convictions for possession may result in denial of federal benefits for up to one year for a first conviction and up to five years for subsequent convictions, successful completion of a drug treatment program, including periodic testing, and appropriate community service, or any combination of the three.

**Forfeiture of Personal Property and Real Estate (21 U.S.C. § 853)** Any person convicted of a federal drug offense punishable by more than one year in prison shall forfeit to the United States any personal or real property related to the violation. A warrant of seizure may be issued and property seized at the time an individual is arrested on charges that may result in forfeiture.

**Federal Drug Trafficking Penalties (21 U.S.C. § 841)** Penalties for federal drug trafficking convictions vary according to the type and quantity of the controlled substance involved in the transaction. Penalties for subsequent convictions are more severe.

In the case of a controlled substance in schedule I or schedule II, GHB, or flunitrazepam, a person shall be sentenced to a term of imprisonment of not more than 20 years. If death or serious bodily injury results from the use of a controlled substance which has been illegally distributed, the person convicted on federal charges of distributing the substance faces the possibility of a life sentence and fines ranging up to \$10 million.

In the case of a controlled substance in schedule III, a person shall be sentenced to a term of imprisonment of not more than 10 years, and if death or serious bodily injury results, shall be sentenced to a term of imprisonment of not more than 15 years or a fine not to exceed \$500,000, or both, for a first offense.

For less than 50 kilograms of marijuana, the term of imprisonment shall not be more than five years, and the fine shall not be more than \$250,000, or both, for a first offense.

In the case of a schedule IV substance, the term of imprisonment shall not be more than five years, and the fine shall not be more than \$250,000, or both, for a first offense.

Persons convicted on federal charges of drug trafficking within 1,000 feet of an elementary school, secondary school, college, or university (**21 U.S.C. § 860**) face penalties of prison terms and fines which are twice as high as the regular penalties for the offense, with a mandatory prison sentence of at least one year, unless the offense involves five grams or less of marijuana.

**Federal Drug Possession Penalties (21 U.S.C. § 844)** Persons convicted on federal charges of possessing any controlled substance face penalties of up to one year in prison, a mandatory fine of no less than \$1,000, or both. Second convictions are punishable by not less than 15 days but not more than two years in prison and a minimum fine of \$2,500. Subsequent convictions are punishable by not less than 90 days but not more than three years in prison and a minimum fine of \$5,000.

## **Drug and Alcohol State Laws**

Category	Summary
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## **Drug and Alcohol Abuse Prevention Program**

The University has a drug and alcohol abuse and prevention program and conducts a biennial review of this program to evaluate its effectiveness. For more information, see below.

### **Student alcohol/drug policy:**

The University is committed to creating and maintaining an environment that is free of alcohol abuse. Schiller encourages safe, responsible behavior toward alcohol. All students are personally responsible for their behavior, and all students should, consider themselves responsible for the safety of themselves and all fellow students.

The following policies are in place to support healthy decisions and encourage responsible behavior:

- The possession, use, consumption, manufacture, sale, or distribution of alcohol by anyone under the age of 21 is strictly prohibited and could result in both criminal charges in accordance to local law and university judicial proceedings in accordance with the student code of conduct.

The University also enforces federal and state drug laws. The possession, sale, manufacture or distribution of illegal drugs is prohibited on campus or as any part of the University's activities. Violators of the University's policies or federal and state laws regarding illegal drugs will be subject to disciplinary action and possibly criminal prosecution.

In keeping with the mission of Schiller International University and the requirements of state and federal laws, the university has adopted the following policy to ensure a drug-free campus and workplace, and to prevent the use of controlled substances. The use of illegal drugs on the SIU campus or in facilities controlled by SIU are prohibited.

The university complies with the Drug-Free Workplace Act of 1988 and the Drug-Free Schools and Communities Act Amendments of 1989.

The possession, use, manufacture, or distribution of any illegal drug is prohibited on property owned or controlled by the university.



Reporting for work, attendance by a student at any class, or attendance by either a student or employee at any activity of the university under the influence of any controlled substance is prohibited.

Additional link provided for SIU students can be found here on Page 40: [2022 – 2023 CATALOG \(storage.googleapis.com\)](#)

## **Policies, Procedures, and Programs Related to Dating Violence, Domestic Violence, Sexual Assault, and Stalking**

Consistent with applicable laws, the University prohibits dating violence, domestic violence, sexual assault, and stalking. The University's policy used to address complaints of this nature, as well as the procedures for filing, investigating and resolving complaints, may be found at:

- Sexual Misconduct Policy: <https://storage.googleapis.com/schiller-pro/uploads/media/03/2022-2023-catalog-2022-05-001-pdf.pdf>
- Alcohol and Illegal Drug Use Policy: <https://storage.googleapis.com/schiller-pro/uploads/media/03/2022-2023-catalog-2022-05-001-pdf.pdf>

The following sections of this report discuss the University's educational programs to promote the awareness of dating violence, domestic violence, sexual assault and stalking; provides information concerning procedures students and employees should follow and the services available in the event they do become a victim of one of these offenses, and advises students and employees of the disciplinary procedures that will be followed after an allegation that one of these offenses has occurred.

### **Primary Prevention and Awareness Program:**

The University conducts a Primary Prevention and Awareness Program (PPAP) for all incoming students and new employees. The PPAP advises campus community members that the University prohibits the offenses of dating violence, domestic violence, sexual assault and stalking. They are also informed of the topics discussed below, including relevant definitions, risk reduction, and bystander intervention.

### **Crime Definitions**

<b>Crime Type</b>	<b>Definitions</b>
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#### *University Definition of Consent*

The University uses the following definition of consent in its sexual misconduct policy for the purpose of determining whether sexual violence (including sexual assault) has occurred:

### **NON-DISCRIMINATION AND HARASSMENT POLICY**

Schiller International University strives to provide an environment that is free from discrimination and harassment. Article 225-1 (modified by the law LOI n.2016-1547 of

November 18th, 2016 – article 86)of French law protect students, staff, and faculty from discrimination and harassment based on their origins, sex, family situation, pregnancy, physical appearance, economic vulnerability, health, loss of autonomy, handicap status, genetic characteristics, moral values, sexual orientation, gender identity, age, political opinions, trade union activity, proficiency in a language other than French, their real or supposed affiliation or non-affiliation with an ethnic group, nation, averred race or religion.

Schiller International University prohibits any form of discrimination and/or harassment. Any student or employee of the university who has a complaint of harassment or discrimination can follow the procedure below.

## DEFINITION

Illegal harassment consists of comments or behaviors that are directed towards a person's origins, sex, family situation, pregnancy, physical appearance, economic vulnerability, health, loss of autonomy, handicap status, genetic characteristics, moral values, sexual orientation, gender identity, age, political opinions, trade union activity, proficiency in a language other than French, their real or supposed affiliation or non-affiliation with an ethnic group, nation, averred race or religion.

Sexual harassment is defined as unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature when:

- Submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment or education status;
- Submission to or rejection of such conduct by an individual is used as the basis for employment or educational decisions affecting such individual; or
- Such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile, or offensive environment.

This includes any form of sexual violence or misconduct. Unlawful Discrimination is defined as treating an individual differently than another based on the individual's origins, sex, family situation, pregnancy, physical appearance, economic vulnerability, health, loss of autonomy, handicap status, genetic characteristics, moral values, sexual orientation, gender identity, age, political opinions, trade union activity, proficiency in a language other than French, their real or supposed affiliation or non-affiliation with an ethnic group, nation, averred race or religion.

## SEXUAL HARRASEMENT GRIEVANCE POLICY AND PROCESS

This information is publically available in in the Employee Handbook, Catalog and website Schiller International University will investigate and adjudicate formal complaints of harassment and sexual harassment using a grievance process that incorporates due process principles, treats all parties fairly, and reaches reliable responsibility determinations.

Sexual harassment means conduct on the basis of sex that satisfies one or more of the following:

(i) A school employee conditioning education benefits on participation in unwelcome sexual conduct (i.e., quid pro quo); or

(ii) 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 school's education program or activity; or Sexual assault (as defined in the Clery Act), rape, dating violence, domestic violence, or stalking.

SIU grievance process:

- SIU will give both parties written notice of the allegations, an equal opportunity to select an advisor of the party's choice, and an equal opportunity to submit and review evidence throughout the investigation;
- SIU's Title IX personnel will objectively evaluate all relevant evidence without prejudice of the facts at issue and free from conflicts of interest or bias for or against either party;
- SIU will protect parties' privacy by requiring a party's written consent before using the party's medical, psychological, or similar treatment records during a grievance process as well as requiring written non-disclosure by all participants of any part of the process to protect the complainants, respondents and witnesses from being exposed to third parties;
- SIU will obtain the parties' voluntary, written consent before using any kind of "informal resolution" process, such as mediation or restorative justice, and not use an informal process where an employee allegedly sexually harassed a student; • SIU will apply a presumption that the respondent is not responsible during the grievance process, so that the school bears the burden of proof and the standard of evidence is applied correctly;
- SIU will use either the preponderance of the evidence standard or the clear and convincing evidence standard for formal complaints against students as for formal complaints against employees;
- SIU will ensure the decision-maker is not the same person as the investigator or the Title IX Coordinator; • SIU may hold a live hearing and allow cross-examination by party advisors (never by the parties personally) this may be done through virtual means if necessary making use of university technology;
- SIU will protect all complainants from inappropriately being asked about prior sexual history;
- SIU will send both parties a written determination regarding responsibility explaining how and why the decision-maker reached conclusions;
- SIU will effectively implement remedies for a complainant if a respondent is found responsible for sexual harassment;
- SIU will offer both parties an equal opportunity to appeal;

- SIU will provide a reporting process of such incidents that protects the anonymity of the complainant or any witness who wishes to report such an incident.
- SIU will protect any individual, including complainants, respondents, and witnesses, from retaliation for reporting sexual harassment or participating (or refusing to participate) in any Title IX grievance process; • SIU will make all materials used to train Title IX personnel publicly available on the school's website.
- SIU will document and keep records of all sexual harassment reports and investigations.

## SEXUAL ASSAULT, DOMESTIC VIOLENCE, DATING VIOLENCE DEFINITIONS S

exual Offenses are defined in French law as follows: Article 222-22: Sexual aggression occurs when any sexual act is committed by violence, constraint, threat or surprise. Rape and other sexual aggressions is committed when they are imposed on the victim in the circumstances outlined by the law. Article 222-23: Any act of sexual penetration, of any sort whatsoever, committed on another person, or on the person of the author of the act, by violence, constraint, threat or surprise constitutes rape. Rape is punishable by 20 years of criminal reclusion when:

1. It results in mutilation or permanent infirmity of the victim
2. When it is committed on a minor of 15 years old or younger
3. When it is committed on a person whose vulnerabilities due to age, health, physical or mental deficiencies is apparent or known by the author
4. When it is committed by a person in a position of authority, by law or in fact
5. When it is committed by use of or the threat of the use of arms
6. When the victim had been contacted by the author of the acts by utilization of electronic communication network
7. When it is committed by the spouse or partner of the victim
8. When it is committed by an author acting in an evident state of intoxication or under the influence of drugs
9. When it is committed on a person who is exercising prostitution, including occasional prostitution.
10. When a minor is present at the scene of the acts committed
11. When a substance had been administered to the victim, against their knowledge, in order to alter their judgment or control their acts Article 222-33:

I. Sexual harassment is the fact of repeatedly imposing upon a victim a set of behaviors or terms carrying sexual or sexist connotation and which undermine the dignity of the victim by

virtue of the degrading or humiliating character by creating an intimidating, hostile or offensive environment. The infraction is committed:

1. When the sets of behaviors or terms are imposed on the same victim by several persons in concert or at the instigation of said persons even if each of these persons did not act in a repeated way
2. When the sets of behaviors or terms are imposed on the same victim by several persons in concert or at the instigation of said persons even in the absence of concertation but know that such behaviors or terms are done in repeated fashion.

II. Applying pressure to obtain sexual favors is also assimilated to sexual harassment whether such acts be for the benefit of the author of mentioned acts or for the benefit of another person III. The above mentioned acts are punishable by 3 years in prison and a fine of 45000€ when the following acts are committed:

1. By a person abusing of their authority
2. When it is committed on a minor of 15 years old or younger
3. When it is committed on a person whose vulnerabilities due to age, health, physical or mental deficiencies is apparent or known by the author
4. When it is committed on a person whose vulnerabilities or dependence result from an apparent weakened social or economic situation known by the author of said acts
5. When it is committed by several persons acting as accomplices
6. When the victim had been contacted by the author of the acts by utilization of electronic communication network
7. When a minor is present at the scene of the acts committed
8. When it is committed by a person in a position of authority, by law or in fact Violence Against Women Act (VAWA) Definitions The Violence Against Women Act of 1994 is a US Federal Law under Title IV § 40001-40703 of the Violent Crime Control and Law Enforcement Act, HR 3355, signed by President Clinton on September 13, 1994.

Domestic Violence: The term “domestic violence” means:

- 1) Felony or misdemeanor crimes of violence committed— (i) By a current or former spouse or intimate partner of the victim; (ii) By a person with whom the victim shares a child in common; (iii) By a person who is cohabitating with or has cohabitated with the victim as a spouse or intimate partner; (iv) By a person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction in which the crime of violence occurred; or (v) By any other person against an adult or youth victim who is protected from that person’s acts under the domestic or family violence laws of the jurisdiction in which the crime of violence occurred.

2) For the purposes of complying with the requirements of this section and section 668.41, any incident meeting this definition is considered a crime for the purposes of Clery Act reporting.

Dating Violence: The term “dating violence” means violence committed by a person:

1) Who is or has been in a social relationship of a romantic or intimate nature with the victim and

2) The existence of such a relationship shall be based on the reporting party’s statement and with consideration of the length of the relationship, the type of relationship, and the frequency of interaction between the persons involved in the relationship. For the purposes of this definition- (i) Dating Violence includes, but is not limited to, sexual or physical abuse or the threat of such abuse. (ii) Dating violence does not include acts covered under the definition of domestic violence. For the purposes of complying with the requirements of this section and section 668.41, any incident meeting this definition is considered a crime for the purposes of Clery Act reporting. Nota Bene: Domestic violence and dating violence are not separate and distinct parts of French law, they are included and understood under laws on rape and sexual harassment Stalking:

The term “stalking” means:

1) Engaging in a course of conduct directed at a specific person that would cause a reasonable person to— (i) Fear for the person’s safety or the safety of others; or (ii) Suffer substantial emotional distress.

2) For the purposes of this definition (i) Course of conduct means two or more acts, including, but not limited to, acts 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. (ii) Substantial emotional distress means significant mental suffering or anguish that may, but does not necessarily, require medical or other professional treatment or counseling. (iii) Reasonable persons means a reasonable person under similar circumstances and with similar identities to the victim.

3) For the purposes of complying with the requirements of this section and section 668.41, any incident meeting this definition is considered a crime for the purposes of Clery Act reporting. There is no specified equivalent for stalking in French law Consent is defined as “voluntary, positive agreement between participants to engage in specific sexual activity” Bystander Intervention – A bystander is a person who is present but not involved: an onlooker or spectator.

Bystander Interventions are in-the-moment interventions where those around an individual or group who are engaging in risky or dangerous behavior, intervene in an attempt to prevent harm.

Steps to intervening include:

- Notice the event or issue

- Determine whether the issue is an emergency or problem
- Take responsibility
- Know what to do
- Take action by directly assisting the victim, detouring the action, or reporting the activity to appropriate authorities. Students must follow and respect French law. Any crimes committed in France are handled exclusively by the police and French legal authorities.

## POLICY STATEMENT ON SEXUAL ASSAULT

Schiller International University prohibits rape, sexual assault, or other forms of nonconsensual sexual activity. Sexual assault violates federal, state, and local laws. Victims of rape or sexual assault are encouraged to file a complaint as soon as possible after the incident. It is important to preserve any evidence of a sexual assault for proof of a criminal offense. All claims of sexual assault will be promptly and thoroughly investigated and corrective action taken if warranted by the results of the investigation. Such action may lead to a campus judicial hearing or to civil or criminal proceedings against the assailant. A student may be found guilty of sexual assault by a campus disciplinary body regardless of whether he or she is found guilty in civil or criminal proceedings.

## POLICY STATEMENT ON DOMESTIC VIOLENCE, DATING VIOLENCE, STALKING

Schiller International University prohibits domestic violence, dating violence, and/or stalking. Victims of domestic violence, dating violence, and stalking are encouraged to file a complaint as soon as possible after the incident. It is important to preserve any evidence of an assault for proof of a criminal offense. All claims will be promptly and thoroughly investigated and corrective action taken if warranted by the results of the investigation. Such action may lead to a campus judicial hearing or to civil or criminal proceedings against the assailant. A student may be found accountable by a campus disciplinary body regardless of whether he or she is found guilty in civil or criminal proceedings.

## PREVENTION AND AWARENESS PROGRAMMING

Programming designed to prevent and promote awareness of sexual assault, domestic violence, dating violence, and stalking is offered on campus throughout the year. A variety of prevention and awareness materials, such as brochures, videos, and posters, are available in the Student Services office, which are designed to promote positive and healthy behavior. The University is committed to reducing the risk to its students, by providing opportunities for discussion and education on this issue.

## RETALIATION

Retaliation against any individual exercising a legal right, such as filing a complaint in good faith or providing information during an investigation, is also expressly prohibited, will not be tolerated and will result in disciplinary action, regardless of the disposition of the underlying complaint.

## REPORTING PROCEDURES

In France, victims of crime including rape and sexual aggression can make a complaint 24 hours a day, 7 days a week at your central police station. You can make a complaint at any police station or gendarmerie, wherever you are staying or wherever the offence was committed. Foreign visitors can also have access to bilingual police officers. Bilingual officers are either placed on reception at the stations or patrol the streets. When a complaint is made, police officers can use the S.A.V.E. software (Foreign Victims Assistance System), available in 16 languages, to report complaints from foreign tourists and give them a receipt in their native language, which simplifies future procedures they may need to take with their embassy or in their own country. A student who has been sexually assaulted has several options for reporting the incident and receiving information and support:

**REPORT THE ASSAULT ON CAMPUS** A complaint can be made to the Campus Director.

**CONFIDENTIALITY** Confidentiality will be kept as much as possible although it may hinder the investigation process. Confidentiality may be withdrawn to prevent future incidents and/or to eliminate a threat to the community. The university is required to report sexual assaults, domestic/dating violence, and stalking allegations in the Annual Security Report and to the Department of Education. All personally identifying information is not included on in any public record keeping. Personally identifying information is defined in Section 40002(a) of the Violence Against Women Act of 1994 as individually identifying information for or about an individual, including information likely to disclose the location of a victim of domestic violence, dating violence, sexual assault or stalking, regardless of whether the information is encoded, encrypted, hashed or otherwise protected, including: a first and last name; a home or other physical address; contact information (including a postal, e-mail or Internet protocol address, or telephone or facsimile number); a social security number, driver's license number, passport number or student identification number; and any other information, including date of birth, racial or ethnic background, or religious affiliation that would serve to identify any individual.

**REPORT THE ASSAULT TO THE POLICE**

Victims of assault can report the incident at the nearest police station. The police will ask victims to provide as much detail about the incident and the perpetrator. If you are physically attacked, the police officer will also give you a written document so that you can be examined at the Legal-Medical Emergencies department (1, place du Parvis Notre-Dame, 75004 Paris - M4 Cité, RER B, St-Michel - Notre-Dame - +33 (0)1 42 34 82 85/29 - open 24 hours a day, 7 days a week). An official certificate will be issued and added to your file.

**PRESERVATION OF EVIDENCE**

The preservation of evidence will help in proving that a criminal offense did occur and may assist in obtaining a protective order. Reporting the incident immediately is a good way to help with this process. Campus Security and Residence Life staff will assist you. Depending on what occurred during the incident, the DNA of your offender might be obtained from a variety of sources, from body hair, saliva, bite marks, semen or vaginal discharge, debris under your fingernails, etc. To preserve evidence, it is best to go to the hospital in the clothing you were wearing at the time of the assault and refrain from bathing, brushing your teeth, washing your hands, and urinating/defecating. Educational resources are available to learn what steps you can take to preserve evidence. **GO TO A HOSPITAL.** Seek assistance at the hospital of your choice, where you may receive treatment for injuries as well as tests that



can provide evidence that may be crucial, should you decide to prosecute. Being treated at the hospital does not mean you have to press charges. The campus can help provide students information from the US Embassy Paris that lists hospitals and doctors in the Paris area who speak in English.

**SEEK COUNSELING.** A trained counselor can assist you during this time of need, advise you of your options and provide you with support in pursuing them. For a written list of support agencies or referral to a counselor, contact the Campus Director. The following resources are available to students: SOS Viols Femmes Informations: 0 800 05 95 95  
Violences Femmes Info: 39 19 Psy Ile-de-France 01 48 00 48 00 Apsytude 06 27 86 91 83.

### Risk Reduction

If you find yourself in an uncomfortable sexual situation, these suggestions may help you reduce your risk:

- Make your limits known before going too far.
- You can withdraw consent to sexual activity at any time. Do not be afraid to tell a sexual aggressor “NO” clearly and loudly.
- Try to remove yourself from the physical presence of a sexual aggressor. Be direct as possible about wanting to leave the environment.
- Grab someone nearby and ask them for help.
- Be responsible about your alcohol and/or drug use. Alcohol and drugs can lower your sexual inhibitions and may make you vulnerable to someone who views an intoxicated/high person as a sexual opportunity.
- Attend large parties with friends you trust. Watch out for your friends and ask that they watch out for you.
- Be aware of someone trying to slip you an incapacitating “rape drug” like Rohypnol or GHB.

If you find yourself in the position of being the initiator of sexual behavior, these suggestions may help you to reduce your risk of being accused of sexual assault or another sexual crime:

- Remember that you owe sexual respect to the other person.
- Don’t make assumptions about the other person’s consent or about how far they are willing to go.
- Remember that consent to one form of sexual activity does not necessarily imply consent to another form of sexual behavior.
- If your partner expresses a withdrawal of consent, stop immediately.
- Clearly communicate your sexual intentions so that the other person has a chance to clearly tell you their intentions.
- Consider “mixed messages” a clear sign that the other person is uncomfortable with the situation and may not be ready to progress sexually.
- Don’t take advantage of someone who is really drunk or on drugs, even if they knowingly and intentionally put themselves in that state. Further, don’t be afraid to step in if you see someone else trying to take advantage of a nearly incapacitated person.

- Be aware of the signs of incapacitation, such as slurred speech, bloodshot eyes, vomiting, unusual behavior, passing out, staggering, etc.

It is also important to be aware of the warning signs of an abusive person. Some examples include: past abuse; threats of violence or abuse; breaking objects; using force during an argument; jealousy; controlling behavior; quick involvement; unrealistic expectations; isolation; blames others for problems; hypersensitivity; cruelty to animals or children; “playful” use of force during sex; Jekyll-and-Hyde personality.

### *Bystander Intervention*

In addition to reporting incidents to appropriate authorities, below are some ways in which individuals can take safe and positive steps to prevent harm and intervene when there is a risk of dating violence, domestic violence, sexual assault, or stalking against another person.

- Look out for those around you.
- Realize that it is important to intervene to help others.
- Treat everyone respectfully. Do not be hostile or an antagonist.
- Be confident when intervening.
- Recruit help from others if necessary.
- Be honest and direct.
- Keep yourself safe.
- If things get out of hand, don’t hesitate to contact the police.

### *Other Information Covered by the PPAP*

The PPAP also provides information on possible sanctions and protective measures that may be imposed following a determination that an offense of dating violence, domestic violence, sexual assault, or stalking has occurred, an explanation of the disciplinary procedures that will be followed when one of these offenses is alleged, the rights of the parties in such a proceeding, available resources, and other pertinent information. Much of this information is set forth in the upcoming sections of this security report.

### **Ongoing Prevention and Awareness Campaign:**

The University also conducts an Ongoing Prevention and Awareness Campaign (OPAC) aimed at all students and employees. This campaign covers the same material as provided in the PPAP, but is intended to increase the understanding of students and employees on these topics and to improve their skills for addressing the offenses of dating violence, domestic violence, sexual assault and stalking.

### **PPAP and OPAC Programming Methods:**

Programming designed to prevent and promote awareness of sexual assault, domestic violence, dating violence, and stalking is offered on campus throughout the year. A variety of prevention and awareness materials, such as brochures, videos, and posters, are available in the Student Services office, which are designed to promote positive and healthy behavior. The University is committed to reducing the risk to its students, by providing opportunities for discussion and education on this issue.

The PPAP and OPAC are carried out in a variety of ways, using a range of strategies, and, as appropriate, targeting specific audiences throughout the University. Methods include, but are not limited to: presentations, online training modules, distribution of written materials, periodic email blasts, and guest speakers. A summary of this programming is provided below.

- New students receive education on the prevention of dating violence, domestic violence, sexual assault, and stalking through a presentation by the Office of Student Services during orientation. All new employees are required to complete an online training module on these topics upon hire and are required to retake the online training each year.
- As part of its ongoing campaign, the University uses a variety of strategies, such as inperson presentations by sexual assault organizations, emails blasts with pertinent information, portal announcements, etc. While programming occurs throughout the year, the University also offers educational sessions and literature in coordination with nationally recognized observances such as Sexual Assault Awareness Month and Domestic Violence Awareness Month.

### **Procedures to Follow if You are a Victim of Dating Violence, Domestic Violence, Sexual Assault, or Stalking:**

If you are a victim of dating violence, domestic violence, sexual assault, or stalking, go to a safe place and call 911 or the Campus Director on +3314538 7455. You may also contact the University's Title IX Coordinator at [sstevic@schiller.edu](mailto:sstevic@schiller.edu).

Victims will be notified in writing of the procedures to follow, including:

1. To whom and how the alleged offense should be reported (contact the Title IX Coordinator or refer to the other resources listed in this report).
2. The importance of preserving evidence that may be necessary to prove the offense in a criminal proceeding or disciplinary action or to obtain a protective order.
3. The victim's options regarding notification to law enforcement, which are: (a) the option to notify either on-campus or local police; (b) the option to be assisted by campus security authorities in notifying law enforcement if the victim so chooses (the institution is obligated to comply with such a request if it is made); and (c) the option to decline to notify such authorities.
4. Where applicable, the rights of victims and the institution's responsibilities regarding orders of protection, no-contact orders, restraining orders, or similar lawful orders issued by a criminal, civil, or tribal court.

#### *Preservation of Evidence & Forensic Examinations*

Victims of physical assault are advised to not remove clothing items worn during or following an assault, as they frequently contain valuable fiber, hair, and fluid evidence. Don't bathe or wash, or otherwise clean the environment in which the assault occurred. You can obtain a forensic examination at [REPORTING PROCEDURES] In France, victims of crime including rape and sexual aggression can make a complaint 24 hours a day, 7 days a week at your central police station. You can make a complaint at any police station or gendarmerie, wherever you are staying or wherever the offence was committed. Foreign visitors can also have access to bilingual police officers. Bilingual officers are either placed on reception at the stations or patrol the streets. When a complaint is made, police officers can use the S.A.V.E.

software (Foreign Victims Assistance System), available in 16 languages, to report complaints from foreign tourists and give them a receipt in their native language, which simplifies future procedures they may need to take with their embassy or in their own country. A student who has been sexually assaulted has several options for reporting the incident and receiving information and support: **REPORT THE ASSAULT ON CAMPUS** A complaint can be made to the Campus Director. **CONFIDENTIALITY** Confidentiality will be kept as much as possible although it may hinder the investigation process. Confidentiality may be withdrawn to prevent future incidents and/or to eliminate a threat to the community. The university is required to report sexual assaults, domestic/dating violence, and stalking allegations in the Annual Security Report and to the Department of Education. All personally identifying information is not included on in any public record keeping. Personally identifying information is defined in Section 40002(a) of the Violence Against Women Act of 1994 as individually identifying information for or about an individual, including information likely to disclose the location of a victim of domestic violence, dating violence, sexual assault or stalking, regardless of whether the information is encoded, encrypted, hashed or otherwise protected, including: a first and last name; a home or other physical address; contact information (including a postal, e-mail or Internet protocol address, or telephone or facsimile number); a social security number, driver's license number, passport number or student identification number; and any other information, including date of birth, racial or ethnic background, or religious affiliation that would serve to identify any individual. **REPORT THE ASSAULT TO THE POLICE** Victims of assault can report the incident at the nearest police station. The police will ask victims to provide as much detail about the incident and the perpetrator. If you are physically attacked, the police officer will also give you a written document so that you can be examined at the Legal-Medical Emergencies department (1, place du Parvis Notre-Dame, 75004 Paris - M4 Cité, RER B, St-Michel - Notre-Dame - +33 (0)1 42 34 82 85/29 - open 24 hours a day, 7 days a week). An official certificate will be issued and added to your file. **PRESERVATION OF EVIDENCE** The preservation of evidence will help in proving that a criminal offense did occur and may assist in obtaining a protective order. Reporting the incident immediately is a good way to help with this process. Campus Security and Residence Life staff will assist you. Depending on what occurred during the incident, the DNA of your offender might be obtained from a variety of sources, from body hair, saliva, bite marks, semen or vaginal discharge, debris under your fingernails, etc. To preserve evidence, it is best to go to the hospital in the clothing you were wearing at the time of the assault and refrain from bathing, brushing your teeth, washing your hands, and urinating/defecating. Educational resources are available to learn what steps you can take to preserve evidence. **GO TO A HOSPITAL.** Seek assistance at the hospital of your choice, where you may receive treatment for injuries as well as tests that can provide evidence that may be crucial, should you decide to prosecute. Being treated at the hospital does not mean you have to press charges. The campus can help provide students information from the US Embassy Paris that lists hospitals and doctors in the Paris area who speak in English. Nearest Hospitals: 1. Robert-Debré Hospital Pagesjaunes (1) · Hospital 48 Boulevard Sérurier, Paris · 01 42 40 35 50 2. European Hospital of Paris Bus service, Bus station 120 République Avenue, Aubervilliers · 01 48 39 45 00 .

Completing a forensic examination does not require you to file a police report, but having a forensic examination will help preserve evidence in case you decide at a later date to file a police report.

Victims are also advised to retain evidence in electronic formats (e.g., text messages, emails, photos, social media posts, screenshots, etc.). Such evidence is valuable in all situations, and it may be the only type of evidence available in instances of stalking.

#### Security/Law Enforcement & How to Make a Police Report

- REPORT THE ASSAULT ON CAMPUS : A complaint can be made to the Campus Director per email to sstevic@schiller.edu
- Commissariat de Police Chaillot 4 Rue du Bouquet de Longchamp 75116 Paris
- To make a police report, a victim should contact the local police agency listed above either by phone or in-person. The victim should provide as much information as possible, including name, address, and when and what occurred, to the best of the victim's ability. Commissariat de Police Chaillot 4 Rue du Bouquet de Longchamp 75116 Paris ·

#### Information about Legal Protection Orders

#### VICTIM'S RIGHTS RIGHTS OF THE COMPLAINANT

In our efforts to encourage reporting and ensure fairness in the campus judicial process, Schiller International University will take all reasonable measures to ensure that any person making a report of sexual assault will be given the following considerations:

- Upon reporting an incident of sexual assault, stalking, domestic/dating violence the victim will receive a written explanation of rights and options.
- Immediate and comprehensive information on all procedural aspects of the process.
- Be accompanied by a person or persons of his or her choice throughout the reporting and campus discipline processes.
- Prompt, fair, and impartial investigation of complaints.
- To be informed, in writing, of counseling and other support services that are available.
- Privacy and confidentiality wherever possible.
- Freedom from pressure to report or not to report an assault to the police.
- Requests for information will be answered in a way that protects privacy interests to the extent possible under the law.
- To the extent possible, be shielded from the presence or actions of the alleged assailant while on campus.
- The right to participate in campus judicial proceedings in accordance with university's policies and procedures.

- Have their past sexual or relationship history excluded from the campus discipline process to the extent possible under the law. • The opportunity to describe the impact of the event and recommend an appropriate penalty if the accused is found responsible. (The complainant may do this by means of a taped statement, to be presented to the disciplinary body.)
- Learn the outcome of campus discipline proceedings in a timely fashion by simultaneous written notification sent to complainant and accused.
- The opportunity to appeal any decision made in campus discipline hearings as provided by the applicable policies and procedures.
- The option to change academic and living situations or other preventative measures after an alleged sexual assault incident, if so requested, and if such changes are reasonably necessary.

## RIGHTS OF THE ACCUSED

If you have been accused of sexual assault, contact the Security Office on the third floor of the RCC Building (or call extension 481) for referral information. In the pursuit of fairness to all parties involved in a complaint of sexual assault, the University will take all reasonable measures to ensure that any person so accused will be given the following considerations:

- Prompt notification that a complaint has been filed against him or her.
- The right to be accompanied by a person or persons of his or her choice throughout the campus judicial process.
- Prompt and thorough investigation of complaints.
- Privacy and confidentiality wherever possible.
- Requests for information will be answered in a way that protects privacy interests to the extent possible under the law.
- Learn the outcome of campus discipline proceedings in a timely fashion by simultaneous written notification sent to complainant and accused.
- The right to appeal any decision made in campus disciplinary hearings.

All University procedures will be followed. These rights will be presented, in writing, to both parties during the initial stages of the investigation.

## PROTECTIVE ORDERS AND OTHER INTERIM MEASURES

The university does not have the authority to issue or enforce legally mandated protective orders but will assist the victim of sexual assault, domestic violence, dating violence, and/or stalking in applying for and obtaining such an order from the local court system. Campus Security Officers will remain vigilant and assist in reporting violations of protective orders. The university is obligated to offer reasonable interim measures that are used to protect the safety and well-being of alleged victims of a crime. Campus Director, will ensure students receive written notification of all their rights and options, regardless of whether a student

chooses to report the incident Campus Security or to Law Enforcement Officers. This written notification will describe options for, available assistance in and how to request changes to academic, living, transportation and working situations or other protective measures. The university will make such accommodations or provide such protective measures if the complainant requests them and if they are reasonably available, regardless of whether the complainant chooses to report the incident to Campus Security or local law enforcement. A victim may also request that the alleged respondent's campus privileges be temporarily suspended (temporary suspension) until the investigation and judicial process is complete. This request can be filed with the Campus Director and if reasonable, action will be taken promptly. Protective measures and accommodations will remain confidential to the fullest extent possible.

Overall, the Campus Director is responsible for overseeing these measures and that they are applied appropriately to ensure the safety and well-being of the victim.

### **Available Victim Services:**

Victims will be provided written notification about existing counseling, health, mental health, victim advocacy, legal assistance, visa and immigration assistance, student financial aid, and other services available to them, both within the University and in the surrounding community. Those services include:

#### *University Resources*

- Student Financial Aid – Sometimes a victim of a crime may feel the need to take a leave of absence from school. If a student is considering a leave of absence based on the circumstances of a complaint, he/she should understand there may be financial aid implications in taking such leave. This should be discussed with financial aid personnel, and the Title IX Coordinator can assist in facilitating this conversation if desired. The [University's] financial aid website can be found at: <https://schiller.edu/scholarships-and-financial-aid/financial-aid>

#### *State/Local Resources*

- <https://www.american-hospital.org/> (American Hospital of Paris)
- <https://www.clinique-monceau.com/fr/> (Clinique Internationale du Parc Monceau)

#### *National Resources*

- National Domestic Violence Hotline: 1-800-799-7233
- National Sexual Assault Hotline: 1-800-656-4673
- Rape, Abuse and Incest National Network (RAINN): <https://www.rainn.org/>
- US Dept. of Justice Office on Violence Against Women: <https://www.justice.gov/ovw>
- National Coalition Against Domestic Violence: <http://www.ncadv.org/>
- National Sexual Violence Resource Center: <http://www.nsvrc.org/>
- U.S. Citizenship and Immigration Services: <https://www.uscis.gov/>
- Immigration Advocates Network: <https://www.immigrationadvocates.org/>

### **Accommodations and Protective Measures:**

The University will provide written notification to victims about options for, and available assistance in, changing academic, living, transportation, and working situations or protective measures. If victims request these accommodations or protective measures and they are reasonably available the University is obligated to provide them, regardless of whether the victim chooses to report the crime to campus security or local law enforcement.

Requests for accommodations or protective measures should be made to the Title IX Coordinator at [sstevic@schiller.edu](mailto:sstevic@schiller.edu) and the Title IX Coordinator is responsible for deciding what, if any, accommodations or protective measures will be implemented.

When determining the reasonableness of such a request, the University may consider, among other factors, the following:

- The specific need expressed by the complainant.
- The age of the students involved.
- The severity or pervasiveness of the allegations
- Any continuing effects on the complainant
- Whether the complainant and alleged perpetrator share the same class or job location.



- Whether other judicial measures have been taken to protect the complainant (e.g., civil protection orders).

The University will maintain as confidential any accommodations or protective measures provided a victim to the extent that maintaining confidentiality would not impair the University's ability to provide them. However, there may be times when certain information must be disclosed to a third party in order to implement the accommodation or protective measure. Such decisions will be made by the University in light of the surrounding circumstances, and disclosures of this nature will be limited so that only the information necessary to implement the accommodation or protective measure is provided. In the event it is necessary to disclose information about a victim in order to provide an accommodation or protective order, the University will inform the victim of that necessity prior to the disclosure, including which information will be shared, with whom it will be shared and why.

### **Procedures for Disciplinary Action:**

Allegations of domestic violence, dating violence, sexual assault, or stalking will be processed through the University's Title IX Policy, Sexual Misconduct Policy, or other relevant policy as appropriate to the allegations [**University Catalog, Staff and Faculty Handbook, Student Handbook**] and the related complaint resolution procedures.

The complaint resolution procedures are invoked once a report is made to one of the following individuals:

Aude Prebay

Campus Director

Paris Campus

55 Avenue Hoche

75008 Paris

E-mail: [aude.prebay@schiller.edu](mailto:aude.prebay@schiller.edu):

Tel: +33 145387455

Egan Hanson

Global Head of Compliance and Institutional Effectiveness

400 N. Tampa St., Tampa, FL 33602 |

T +1 813-323-9088

E [egan.hanson@schiller.edu](mailto:egan.hanson@schiller.edu)

Reports may be made to Ms. Aude Prebay, Campus Director per email: aude.prebay@schiller.edu or by phone: +33 14538 7455.

Anyone who feels that he/she has been subjected discrimination and/or harassment by fellow employees, vendors, visitors, students and/or guests should report the incident in writing to his or her immediate supervisor or the Campus Director who also serves as the Title IX Coordinator.

Complaints will be promptly and thoroughly investigated by the Title IX Coordinator and appropriate person or persons. Investigations will be designed to protect the reasonable privacy interests of all parties concerned. All parties must cooperate with and provide information relative to these investigations. Disciplinary and corrective action, up to and including discharge, will be taken dependent upon the circumstances and as appropriate. Ms. Aude Prebay is the campus Title IX Coordinator.

Campus Director can be contacted using the following methods:

- Phone: +33 (0) 1 45.38.74.55
- Email: aude.prebay@schiller.edu

### **Rights of the Parties in an Institutional Proceeding:**

During the course of the process described in the previous section, both the accuser and the individual accused of the offense are entitled to:

1. A prompt, fair and impartial process from the initial investigation to the final result.
  - A prompt, fair and impartial process is one that is:
    - Completed within reasonably prompt timeframes designated by the institution's policy, including a process that allows for the extension of timeframes for good cause, with written notice to the accuser and the accused of the delay and the reason for the delay.
    - Conducted in a manner that:
      - Is consistent with the institution's policies and transparent to the accuser and the accused.
      - Includes timely notice of meetings at which the accuser or accused, or both, may be present; and
      - Provides timely access to the accuser, the accused and appropriate officials to any information that will be used during the informal and formal disciplinary meetings and hearings.
    - Conducted by officials who do not have a conflict of interest or bias for or against the accuser or the accused.
2. Proceedings conducted by officials who, at a minimum, receive annual training on the issues related to dating violence, domestic violence, sexual assault, and stalking and on how to conduct an investigation and hearing process that protects the safety of victims and promotes accountability.

- Such training addresses topics such as the definition of sexual harassment; the scope of the University's education programs and activities; how to conduct investigations, hearings, and appeals and informal resolutions (as applicable); relevant evidence and how it should be used during a proceeding; proper techniques for questioning witnesses; basic procedural rules for conducting a proceeding; and avoiding actual and perceived conflicts of interest.

SIU Paris campus is committed to providing in-house Title IX Training to all their staff and faculty. Students receive regular communication on updated policies and procedure within university, as well as update on any relevant legislation framework.

3. The same opportunities to have others present during any institutional disciplinary proceeding, including the opportunity to be accompanied to any related meeting or proceeding by the advisor of their choice. The institution may not limit the choice of advisor, but may establish limits regarding the extent to which that advisor may participate in the proceeding, as long as those limits apply equally to both parties.
4. Have the outcome determined using the preponderance of the evidence standard .
5. Simultaneous, written notification of the results of the proceeding, any procedures for either party to appeal the result, any change to the result, and when the result becomes final. For this purpose, "result" means "any initial, interim and final decision by an official or entity authorized to resolve disciplinary matters" and must include the rationale for reaching the result and any sanctions imposed.

### **Possible Sanctions or Protective Measures that the University May Impose for Dating Violence, Domestic Violence, Sexual Assault or Stalking Offenses:**

Following a final determination in the institution's disciplinary proceeding that dating violence, domestic violence, sexual assault, or stalking has been committed, the institution may impose a sanction depending on the mitigating and aggravating circumstances involved. The possible sanctions include: warning; reprimand; probation; restitution; fine; loss of privileges; housing probation; suspension or expulsion/termination; restriction on eligibility to represent the University at any official function or in any intercollegiate competition. If a suspension is imposed on a student, it may be for part of a semester, a full semester, or an entire academic year. An employee may be suspended for any length of time determined appropriate by the Campus Director and/or Director of Human Resources. Following a suspension, the individual will be required to meet with the Dean of Students (student) or Director of Human Resources (employee) to discuss re-entry and expectations going forward.

In addition, the University can make available to the victim a range of protective measures. They include: forbidding the accused from entering the victim's residence hall and from communicating with the victim, other institutional no-contact orders, security escorts, modifications to academic requirements or class schedules, changes in working situations, etc.

As an example:

The university does not have the authority to issue or enforce legally mandated protective orders but will assist the victim of sexual assault, domestic violence, dating violence, and/or stalking in applying for and obtaining such an order from the local court system. Campus Security Officers will remain vigilant and assist in reporting violations of protective orders.

The university is obligated to offer reasonable interim measures that are used to protect the safety and well-being of alleged victims of a crime. Campus Director, will ensure students receive written notification of all their rights and options, regardless of whether a student chooses to report the incident Campus Security or to Law Enforcement Officers.

This written notification will describe options for, available assistance in and how to request changes to academic, living, transportation and working situations or other protective measures. The university will make such accommodations or provide such protective measures if the complainant requests them and if they are reasonably available, regardless of whether the complainant chooses to report the incident to Campus Security or local law enforcement.

A victim may also request that the alleged respondent's campus privileges be temporarily suspended (temporary suspension) until the investigation and judicial process is complete. This request can be filed with the Campus Director and if reasonable, action will be taken promptly. Protective measures and accommodations will remain confidential to the fullest extent possible.

The Campus Director is responsible for overseeing these measures and that they are applied appropriately to ensure the safety and well-being of the victim.

### **Publicly Available Recordkeeping:**

The University will complete any publicly available recordkeeping, including Clery Act reporting and disclosures, without the inclusion of personally identifiable information about victims of dating violence, domestic violence, sexual assault, and stalking who make reports of such to the University to the extent permitted by law.

### **Victims to Receive Written Notification of Rights:**

When a student or employee reports to the University that he or she has been a victim of dating violence, domestic violence, sexual assault, or stalking, whether the offense occurred on or off campus, the University will provide the student or employee a written explanation of his or her rights and options as described in the paragraphs above.

### **Sex Offender Registration Program:**

The Campus Sex Crimes Prevention Act of 2000 requires institutions of higher education to advise members of the campus community where they can obtain information provided by the state concerning registered sex offenders. It also requires sex offenders to notify the state of each institution of higher education in the state at which they are employed or enrolled or carrying on a vocation. The state is then required to notify the University of any such information it receives. Anyone interested in determining whether such persons are on this

campus may do so by contacting the Ms. Aude Prebay, Campus Director at Ms. Aude Prebay, Campus Director. State registry of sex offender information may be accessed at the following link:<https://ecris.eu/countries/french-criminal-record-check/>

## **Timely Warnings and Emergency Response**

### *Timely Warnings*

In the event of criminal activity occurring either on campus or off campus that in the judgment of the Ms. Aude Prebay, Campus Director Mr. Egan Hanson, Global Head of Compliance and Institutional Effectiveness constitutes a serious or continuing threat to members of the campus community, a campus-wide “timely warning” will be issued. Examples of such situations may include a sexual assault or a series of motor vehicle thefts in the area that merit a warning because they present a continuing threat to the campus community. Warnings will be communicated to students and employees via one or more of the methods discussed later in this section. Updates to the warnings will be provided as appropriate.

Anyone with information warranting a timely warning should immediately report the circumstances to:

- Ms. Sanja Stevic, Academic Dean, [sstevic@schiller.edu](mailto:sstevic@schiller.edu)

The University has communicated with local law enforcement asking them to notify the University if it receives reports or information warranting a timely warning.

### *Emergency Response*

The University has an emergency management plan designed to ensure there is a timely and effective response in the event of a significant emergency or dangerous situation occurring on campus involving an immediate threat to the health or safety of members of the campus community. Such situations include, but are not limited to: tornadoes, bomb threats, chemical spills, disease outbreaks, fires, active shooters, etc. The University has communicated with local police requesting their cooperation in informing the University about situations reported to them that may warrant an emergency response.

Overall responsibility lies with Campus Director.

Students, staff and visitors are encouraged to notify the Ms. Aude Prebay, Campus Director at Ms. Aude Prebay, Campus Director of any emergency or potentially dangerous situation.

The Campus Director in collaboration with other appropriate personnel, will determine who should be notified, and will, without delay, and taking into account the safety of the community, determine the content of the notification and initiate the notification system, unless issuing a notification will, in the professional judgment of responsible authorities, compromise efforts to assist a victim or to contain, respond to or otherwise mitigate the emergency.

Depending on the segments of the campus the notification will target, the content of the notification may differ. When appropriate, the content of the notification will be determined in consultation with local authorities. Also, as appropriate, the notification will give guidance as to whether its recipients should shelter in place or evacuate their location.

Once the emergency is confirmed and based on its nature, the Campus Director will consult with other appropriate University officials to determine the appropriate segment or segments of the University community to be notified.

Ms. Aude Prebay, Campus Director, will access available sources of information from campus administrative staff and local authorities to confirm the existence of the danger and will be responsible for initiating the institution’s response and for marshaling the appropriate local emergency response authorities for assistance. Depending on the nature of the emergency, other University departments may be involved in the confirmation process.

Campus security procedures and practices are explained to students during orientation and continued throughout the year. Crime prevention literature is available from the Campus Director

The Campus Director will direct the issuance of emergency notifications, which will be accomplished using one or more of methods discussed later in this section, depending on the nature of the threat and the segment of the campus community being threatened.

At the direction of Campus Direction, the Emergency Response Team at Paris Campus (Campus Director, Campus Registrar and Bursar) will notify local law enforcement of the emergency if they are not already aware of it and local media outlets in order that the larger community outside the campus will be aware of the emergency.

Methods for Issuing Timely Warnings and Emergency Notifications

The method(s) listed below may be utilized when the University issues a timely warning or emergency notification to the campus community.

<b>Method</b>	<b>Sign Up Instructions</b>
Mass or limited notification	On advise of Campus Director
Fire Alarm	Campus Director
E-mail Alert sent to Students, Faculty and Staff	Campus Director
Notice to local emergency services	Campus Director

Testing & Documentation

The University tests its emergency response and evacuation procedures at least once a year. The tests may be announced or unannounced. Also, at various times the Emergency Management Team will meet to train and test and evaluate the University’s emergency response plan.

The Campus Director maintains a record of these tests and training exercises, including a description of them, the dates and times they were held and an indication of whether they were announced or unannounced. In connection with at least one such test, the University will distribute to its students and employees information to remind them of the University’s emergency response and evacuation procedures.

**Crime Statistics**

The statistical summary of crimes for this University over the past three calendar years follows:

Crime	On Campus			Non Campus			Public Property		
	2021	2020	2019	2021	2020	2019	2021	2020	2019
Murder/Non-Negligent Manslaughter	0	0	0	0	0	0	0	0	0
Manslaughter by Negligence	0	0	0	0	0	0	0	0	0
Rape	0	0	0	0	0	0	0	0	0
Fondling	0	0	0	0	0	0	0	0	0
Statutory Rape	0	0	0	0	0	0	0	0	0
Incest	0	0	0	0	0	0	0	0	0
Aggravated Assault	0	0	0	0	0	0	0	0	0
Burglary	0	0	0	0	0	0	0	0	0
Robbery	0	0	0	0	0	0	0	0	0
Motor Vehicle Theft	0	0	0	0	0	0	0	0	0
Arson	0	0	0	0	0	0	0	0	0
Arrest - Liquor Law Violation	0	0	0	0	0	0	0	0	0
Arrest - Drug Abuse Violation	0	0	0	0	0	0	0	0	0
Arrest - Weapon Violation	0	0	0	0	0	0	0	0	0
Disciplinary Referral - Liquor Law Violation	0	0	0	0	0	0	0	0	0
Disciplinary Referral - Drug Abuse Violation	0	0	0	0	0	0	0	0	0
Disciplinary Referral - Weapon Violation	0	0	0	0	0	0	0	0	0
Domestic Violence	0	0	0	0	0	0	0	0	0
Dating Violence	0	0	0	0	0	0	0	0	0
Stalking	0	0	0	0	0	0	0	0	0

\* The University does not have on-campus student housing facilities.

**Hate crimes:**

2021: No hate crimes reported.  
 2020: No hate crimes reported.  
 2019: No hate crimes reported.

**Crimes unfounded by the University:**

2021: 0 unfounded crimes.  
 2020: 0 unfounded crimes.

2019: 0 unfounded crimes.

**Statistics for unfounded crimes provided by law enforcement agencies:**

2021: 0 unfounded crimes.

2020: 0 unfounded crimes.

2019: 0 unfounded crimes.

**Data from law enforcement agencies:**

- The University was provided with some crime data from law enforcement agencies for which it cannot be determined whether any of the statistics apply to or include the University's Clery Geography.
- Certain law enforcement agencies did not comply with the University's request for crime statistics.