

Schiller International University



2022 COMBINED ANNUAL SECURITY REPORT & FIRE SAFETY 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 Tanja Ward, Zollhofgarten 1, Heidelberg, Germany, 69115. 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 working relationship with local police on a case by case basis. Heidelberg PD has an office at Bahnstadt and there is regular police patrolling in the area, also due to the ongoing construction sites around the campus location.

Contact information for the local law enforcement: Polizeirevier Heidelberg-Mitte: Dial 110; Römerstraße 2-4, 69115 Heidelberg; <https://ppmannheim.polizei-bw.de/>.

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.

- Campus Director at tanja.ward@schiller.edu
- Campus Dean at sstevic@schiller.edu

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 appropriate administrator and the police. The number to contact is: 06221 4851-0. An emergency number is available 24/7 - dial 110 or 112.
- If a crime is in progress or there is some other situation posing imminent danger, local law enforcement can be reached by dialing 110.
- 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.

While students and employees are encouraged to report crimes to the Campus Safety Officer or Police, the Registrar, Academic Advisor, or any other administrators on campus will provide assistance in reporting incidents. Schiller International University policy requires that when a crime or student code of conduct violation occurs on campus it is to be reported as soon as possible, so that an accurate incident report can be filed promptly. Crimes may be reported to the following administrators who will ensure that the information will be used for processing timely warnings and preparing the annual statistical disclosure: Campus Safety Officer - Campus Director; any Administrator on duty, and the Police: 110.

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.

All crimes and incidents must be reported to the Campus Director, or to a member of staff.

The Heidelberg Campus does not have a written agreement with the local law enforcement agencies, yet where a serious incident has taken place, the local police, fire or ambulance must be called immediately.

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. It is the University's policy that all alleged crimes be reported to the appropriate law enforcement agency promptly.

The University does not provide pastoral care but offers counseling on campus on several dates each month. 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 Counselor, or Campus Director, Ms. Tanja Ward, who is also the Title IX coordinator. She receives annual training from the company Title IX Coordinator. 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.

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.

Contact information for local law enforcement, available 24 hours a day:

Heidelberg Police department: 110

Heidelberg Emergency/ Fire Department: 112

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 director. 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.

The University encourages its professional counselors, if and when they deem it appropriate, to inform the person they are counseling to report crimes on a voluntary, confidential basis for inclusion in the annual report of crime statistics. The University does not have pastoral counselors.

Security of and Access to Campus Facilities

All academic buildings are secured during the evenings and weekends. Then, access to the buildings is only allowed for faculty/staff members and students who are accompanied by faculty/staff members.

The residence halls are locked automatically. Security officers are patrolling the dorm buildings at night, performing random "walk-throughs" in residence halls from 11:30 p.m. until 6:00 a.m. each night. The officers also patrol surrounding areas.

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 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.

Security Considerations in the Maintenance of Facilities

The Campus Director and administrators work with the Facilities Department to identify maintenance issues on campus that may be safety hazards. Safety checks are completed to identify building safety lights that are not functioning properly. Maintenance personnel

regularly check to ensure there is adequate lighting on pathways and that egress lighting is working in hallways and stairwells.

All university faculty and staff are responsible to reporting maintenance and other safety issues to the Campus Director as soon as possible.

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 seeks to enhance the security of its campus and all community members by providing information at the beginning of each academic term for students and employees regarding the University's security procedures and practices. This information is made available during the orientation session and on the website. 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 on occasion by Student Services.

Monitoring Off Campus Locations of Recognized Student Organizations

The University does not monitor and record, through local police agencies, any criminal activity in which students have engaged at off-campus locations of student organizations officially recognized by the University, including student organizations with off-campus housing facilities. However, we are aware of at least one police agency that performs such monitoring and recording.

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.

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, **unless it is done so in accordance with applicable University policies**, and it also enforces the state's underage drinking laws.

In addition, students are required to follow the German legislation regarding drugs.

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 16 (18 for hard liquor) 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.

The minimum age for the purchase and consumption of alcohol in Germany is 16. Germany also has some of Europe's most stringent drive/drive regulations. One can expect to be breathalyzed if involved

in any accident or incident. Fines and imprisonment can follow. *Heidelberg legislation on alcohol can be found at Germany's local legislation on alcohol:*
<https://dejure.org/gesetze/JuSchG/9.html>.

GERMAN LAW

§ 9 "Alkoholische Getränke" (Alcoholic beverages)

Penalties and sanctions for illegal possession of a controlled substance.

Young people under the age of 18 are not allowed to buy or consume hard liquor in restaurants, shops or in public. ("Alkopops" contain liquor and are covered by this paragraph, an indication of which must be clearly visible on the label since the introduction of the Alcohol Tax Act (AlkopopStG).)

For other alcoholic beverages (e.g. beer and wine), the clause stipulates that children and young adults under the age of 16 are not allowed to buy and consume in public.

An exception applies if a young adult (as of 14) is accompanied by a person with the right of custody.

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.

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.

In addition, students are required to follow the German legislation regarding drugs.

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.

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 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 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.

GERMAN LAW

§ 9 “Alkoholische Getränke” (Alcoholic beverages) - see above.

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:

- Safety Report: <https://schiller.edu/download-center>

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

Crime Type	Definitions
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University Definition of Consent

Consistent with applicable laws, the University prohibits dating violence, domestic violence, sexual assault, and stalking.

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:

Statutory Definition of Consent "Consent" means intelligent, knowing, and voluntary consent and does not include coerced submission. "Consent" shall not be deemed or construed to mean the failure by the alleged victim to offer physical resistance to the offender. Persons defined as incapable of consent to sexual activity includes those whose judgement has been impaired due to the ingestion of drugs/ alcohol, the mentally incapacitated, or someone who is unconscious.

Definition Dating Violence

Dating violence is described by the Center for Relationship Abuse Awareness as a pattern of abusive and coercive behaviors used to maintain power and control over a former and current intimate partner.

Dating violence can be psychological, sexual, physical and/or emotional. Can be a criminal act according to § 223 STGB.

See further definition: Sexual Assault.

Definition Domestic Violence

Physical, sexual or psychological aspects between human beings sharing accommodation, refers to acts of violence (irrespective of the scene of the crime and whether or not you live together) between people in a relationship that

- is still ongoing
- is in the process of breaking up or
- has already broken up

or between people that

- are related to each other, insofar as these are not crimes against children. Domestic violence (even observed violence) poses a risk to a child's welfare. *

* Common definition according to the Senatsverwaltung für Inneres und Sport/ Senatsverwaltung für Justiz (Senate Administration for Interior and Sport/Senate Administration for Justice) 10/2001 Criminal act (§§223, 185 and 238 STGB).

Definition Sexual Assault

Behavior not respecting the other person's integrity; can be physically or verbally Criminal act (§ 184 STBG).

Definition Stalking

Bothering someone persistently; can lead to physical or psychological damage of the victim.

Sexual assault or violence is any form of physical harm or the threat to another person from a sexual point of view. Today, the term "sexual assault" is often replaced by the term "sexual violence" to make it clear that it is violence and not an act of consented sex.

Criminal act – prison up to 3 years or higher, if danger for the victim or fine.

Sex Offender Registry

There is currently no Sex Offender Registry in Germany.

Statutory Penalty Ranges

Germany has a judiciary system without sentencing guidelines or sentencing commissions. Therefore, there is - in general - significant room for judicial sentencing discretion.

However, for every single type of offence a concrete statutory sentencing range is provided. In addition, these ranges differentiate between the specific circumstances under which the offense has been committed. This applies in particular for serious offences like sexual abuse of adults or minors, trafficking in drugs, robbery, bribery or arson. In these categories of offences, a number of specific aggravating and mitigating circumstances with specific statutory sentencing ranges is provided.

Sexual abuse (of adults)

Sexual assault by use of force or threats: imprisonment from one to fifteen years; rape: imprisonment from two to fifteen years; sexual assault by carrying a weapon or by placing the victim in danger of serious injury: imprisonment from three to fifteen years; sexual assault by using a weapon or seriously injuring the victim or placing the victim in danger of death: imprisonment from five to fifteen years; Sexual assault causing the death of the victim by reckless disregard: imprisonment from ten to fifteen years or imprisonment for life.

Violence against Women Act (VAWA)

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.

Any one experiencing violence or harassment should report this to the Campus Director or to the local Police immediately.

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

An incident may qualify as rape or sexual assault regardless of whether the victim knows the assailant; the degree of physical or verbal resistance offered by the victim; the presence or absence of physical injuries to the victim; or the presence or absence of the victim's previous voluntary association, sexual or otherwise, with the assailant.

Sexual assault includes any form of nonconsensual sexual intercourse committed by physical force, coercion, threat or intimidation, actual or attempted and includes (but is not limited to) any or all of the

following behaviors: oral, vaginal, or anal intercourse; sexual touching, exhibitionism, sexual contact with someone who is incapable of consent; and sexual contact with someone who has resisted verbally or physically.

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

(See above section)

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:

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.

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 and the Campus Security Department 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.

PREVENTION AND AWARENESS PROGRAMMING

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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 110 or the Campus Reception at +49 (0) 6221 4851-0. You may also contact the University's Title IX Coordinator at +49 (0) 6221 458120.

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

[Salutem Praxisklinik
Eppelheimer Str. 8
06221 3929114](#)

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

- Campus Director /CSO (Tanja Ward): +49 (0) 6221 458120 Reception: can be reached from every room on campus by dialing -11.
- - 110 Polizeirevier Heidelberg-Mitte Römerstraße 2-4 69115 Heidelberg Telefon: 06221 991700
- 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.

Information about Legal Protection Orders

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.

If you have obtained a protection order and need it to be enforced in your area, you should contact the local police department.

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

- Health resources provided: Monika Weuster (Student Services), monika_weuster@schiller.edu
- Counseling services provided: Dr. Koppel, Info@DrKoppel.de
- 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.

State/Local Resources

- St. Joseph's Hospital in Heidelberg

Landhausstrasse 25

69115 Heidelberg

T 06221 526-0

F 06221 526-960

info@st.josefskrankenhaus.de

<https://www.st.josefskrankenhaus.de/>

- Victim Advocacy and Support

- Frauenhaus“Womanhouse“ Heidelberg Frauen helfen Frauen e.V. Postfach 102343 69013 Heidelberg; phone: +49 6221 833088; email: info@fhf-heidelberg.de Homepage: www.fhf-heidelberg.de/

- Zuflucht und Beratung für misshandelte Frauen und ihre Kinder/ Frauennotruf gegen sexuelle Gewalt an Frauen und Mädchen e.V.; Bergheimer Straße 135; 69115 Heidelberg

- Or call Sexual Assault Service Helpline: +49 (0) 6221 833088

The following provides information regarding your options within the criminal justice system:

File a report

A uniformed, on-duty police officer will take your report. He or she probably will ask a number of questions regarding the incident to be certain that he or she has all the information needed.

Press charges

There is no requirement that you press charges. If sufficient evidence exists, the Prosecutor's Office may decide to press charges and may require you to testify. If you press charges, you likely will be interviewed by the police again, perhaps by a detective.

After the authorities have gathered statements and evidence, they will turn them over to the Prosecuting Attorney of the corresponding County. Based on a review of these materials, the Prosecutor will decide if the evidence is sufficient to warrant a preliminary hearing.

Choosing not to press charges immediately following an assault does not mean that you may not press charges later. However, you should be aware that your decision to delay making a report or pressing charges could make it harder for the prosecution.

National Resources

- National Domestic Violence Hotline: 0800-116-016
- National Sexual Assault Hotline: 0800-116-016
- Rape, Abuse and Incest National Network: <https://www.hilfetelefon.de/en.html>
- [German Policy on Domestic Violence - EUCPN](https://eucpn.org/document/german-policy-on-domestic-violence): <https://eucpn.org/document/german-policy-on-domestic-violence>
- [Police roles](https://www.iamexpat.de/expat-info/emergency-numbers-services-germany/german-police): <https://www.iamexpat.de/expat-info/emergency-numbers-services-germany/german-police>
- Germany: information for victims of rape and sexual assault: <https://www.gov.uk/government/publications/information-for-victims-of-rape-and-sexual-assault-in-germany/germany-information-for-victims-of-rape-and-sexual-assault>
- Immigration Services: <https://de.germanimmigrationlaw.com/>
- The German Federal Office for Migration and Refugees (<http://www.bamf.de>)

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.

- National Domestic Violence Hotline: 0800-116-016

- National Sexual Assault Hotline: 0800-116-016

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:

The Heidelberg Campus abides by both Title IX and German legislation.

Procedures for disciplinary action in cases of alleged dating violence, domestic violence, sexual assault, or stalking, will be conducted by trained officials and will include a prompt, fair, and impartial process.

SEXUAL HARRASEMENT GRIEVANCE POLICY AND PROCESS

This information is publicly 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:

1.
 - ii. A school employee conditioning education benefits on participation in unwelcome sexual conduct (i.e., quid pro quo); or
2.
 - 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 prejudgment 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.

- Any appeal will be discussed (decision-maker, investigator, Title IX Coordinator, trained official); any changes to the result will be send to both parties in writing, including when they come into effect.
- 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 document and keep records of all sexual harassment reports and investigations (locally at the CD office and sharedrive, considering data protection laws).
- SIU will make all materials used to train Title IX personnel publicly available on the school's website.

REPORTING PROCEDURES

A student who has been sexually assaulted has several options for reporting the incident and receiving information and support:

Report the Assault on Campus.

If you have been assaulted by a member of the University community or on campus by a non-community member, you may file a complaint by contacting one of the following people directly:

- CSO / Title IX coordinator / Campus Director : +49 (0) 6221 458120
- Receptionion: +49 (0) 6221 45810
- Off-campus emergency services can be reached calling 110.

These resource personnel can inform you of your options and provide assistance in pursuing them. You may contact them in person or by telephone. The University personnel may likely be required to inform the police of any sexual assaults of which they become aware.

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. The preservation of evidence will help in proving that a criminal offense did occur and may assist in obtaining a protective order.

RIGHTS OF THE COMPLAINANT

In our efforts to encourage reporting and ensure fairness in the campus judicial process, the 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 Campus Director, or Safety Officer. 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.

DISCIPLINARY PROCEEDINGS AND POSSIBLE SANCTIONS

Reports of sexual assaults, domestic violence, dating violence, and stalking are taken seriously by the university. Investigations and judicial proceedings are conducted in a prompt, fair, and impartial manner. Any student who is charged with rape, acquaintance rape, or other sex offense, forcible or non-forcible, may be subject to disciplinary action by the University in accordance with campus disciplinary procedures. Violations of this nature are considered especially heinous and are handled by the Title IX Coordinators.

Responsibilities of the Title IX Coordinator

The Title IX Coordinator oversees implementation and enforcement of the Schiller Title IX Non-Discrimination, Sexual Harassment and Grievance Procedure Policy, which includes primary responsibility for coordinating the School'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 Investigation Process

Investigators (Title IX Coordinator) serve free from conflict of interest, objectively and without bias. All investigations are thorough, reliable, impartial, prompt, and fair. Investigations involve interviews with all relevant parties and witnesses and obtaining available, relevant evidence. The School, not the parties, bears the burden of gathering evidence and burden of proof. Parties have equal 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.

The University's campus disciplinary procedures are separate and apart from criminal proceedings. Each process may impose sanctions independently. A student may be subject to suspension during the pendency of the investigation and disciplinary proceedings as deemed necessary and appropriate by the University.

An organization or individual found to have aided or abetted a sexual assault may face the same sanctions. Non-students may be banned from campus. A person found responsible for bringing a false accusation of sexual assault against another member of the campus community may be subject to disciplinary action including, but not limited to, probation, suspension, expulsion, or dismissal.

Upon receipt of a report or Complaint, the Title IX Coordinator shall undertake an initial assessment to determine appropriate next steps as required under this Policy, including making an initial threat assessment to ensure there is no immediate danger to Complainant or the campus community and, if there is, to take appropriate action, which may include emergency removal of Respondent as described below.

The Coordinator shall contact Complainant to discuss the availability of appropriate supportive measures that may be implemented with input from the Complainant irrespective of, and in addition to, any resolution process including the formal Grievance Process, and will notify Complainant about the right to have an advisor.

If the report has been made without filing a Complaint, the Title IX Coordinator will review the allegations and discuss options with the Complainant, including the option of proceeding with a Complaint. If the Complainant does not want to proceed with a Complaint, the Coordinator may initiate a Complaint if the Coordinator determines that a Complaint is warranted.

If the Complainant files a Complaint, or the Title IX Coordinator initiates a Complaint, the matter will proceed as described under the Grievance Process.

After submission of a Complaint and after notifying the Respondent of the Complaint's allegations, the parties will be notified of the availability of informal resolution, as applicable. All parties must voluntarily consent in writing to any informal resolution process. The parties may withdraw such consent at any time and resume the formal Grievance Process.

At all stages of the process, irrespective of any resolution or grievance process which may be implemented, responsive and reasonable supportive measures will be implemented to ensure continued access to the School's educational program or activities.

Appeals

Any party may file an Appeal on the following grounds. Appeals must be submitted in writing to the Title IX Coordinator within 5 days of the delivery of the Notice of Outcome. After expiration of the appeal window, the determination will be considered final, and any applicable sanctions will be imposed.

Grounds for Appeal

Appeals may be made on the following bases:

1. Procedural irregularity that affected the outcome of the matter;
2. 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
3. The Title IX Coordinator, Investigator(s), or Decision-maker(s) 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.

Any sanctions imposed as a result of the Final Determination are stayed during the appeal process.

Title IX personnel with prior involvement in the matter will not be permitted to serve as a Decision-maker in the appeal. Appeals will not include a hearing. A decision on the merits will be based on information provided in the appeal document. If an appeal is based on the availability of new evidence, this evidence must be described with specificity and must be available for review within a reasonably prompt timeframe for consideration.

The appeal outcome will specify the finding on each ground for appeal, any specific instructions for remand or reconsideration, and the rationale supporting the findings. Appeal decisions will be made within seven (7) business days, barring exigent circumstances, including the review of new evidence not immediately available for submission with the appeal request. Decisions on appeal will be made by applying the preponderance of evidence OR clear and convincing and convincing standard.

Notification of the appeal outcome will be made in writing and will be delivered simultaneously to the parties by one or more of the following methods: in person, mailed to the local or permanent address of the parties as indicated in official School records, or emailed to the parties' School-issued email or otherwise approved account. Once mailed, e-mailed and/or received in-person, notice will be presumptively delivered. Decisions on appeal are considered final (see Schiller Title IX Non-Discrimination, Sexual Harassment and Grievance Procedure Policy Handbook).

The Chairperson of the Rules Committee, the Title IX coordinator, and the Director of Campus Safety and Security will receive training on an annual basis on how to officiate

including investigation techniques and how to remain fair and impartial during the hearing.

DISCLOSURE OF RESULTS OF DISCIPLINARY PROCEEDINGS

Consistent with the Student Code of Conduct and related documents regarding the handling of violations of same, the decisions reached by the Rules Committee related to an alleged crime will be conveyed in writing to the alleged perpetrator and to the victim or next of kin if the victim is deceased. If it appears that a violation of law may have occurred, the victim will be advised that the University's procedure for processing violations of the Student Code of Conduct does not limit, encumber, or reduce the legal remedies that may be available to the victim under the law. The results of any disciplinary proceeding that arises from an allegation of dating violence, domestic violence, sexual assault, or stalking require simultaneous notification, in writing, to both the accuser and the accused.

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.

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.
 - o 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.

- **The Heidelberg Campus abides by both Title IX and German legislation.**

Procedures for disciplinary action in cases of alleged dating violence, domestic violence, sexual assault, or stalking, will be conducted by trained officials and will include a prompt, fair, and impartial process.

SIU will make all materials used to train Title IX personnel publicly available on the school's website.

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.

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 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.

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.

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 Campus Director / Ms. Tanja Ward at Campus Director / Ms. Tanja Ward. State registry of sex offender information may be accessed at the following link: <https://www.europol.europa.eu>

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 Timely Warnings In the event of criminal activity occurring either on campus or off campus that in the judgment of the EMERGENCY RESPONSE TEAM (ERT) In the event of a significant emergency or dangerous situation involving an immediate threat to the health or safety of students or employees occurring on campus, the Emergency Response Team (ERT) is responsible for assessment and implementation of emergency procedures, including but not limited to, evacuations, lockdowns, crowd control, access controls, and coordination with responding emergency services. The ERT will assemble to direct the handling of the crisis. 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. The purpose of the Schiller International University Safety Plan is to establish policies, procedures, and an organizational structure for response to significant emergency or dangerous situations. Nothing in this plan shall be construed in a manner that limits the use of good judgment and common sense in matters not foreseen or covered by the elements of the plan. The safety plan and organization shall be subordinate to State and Federal plans during a disaster declared by those authorities. Anyone with information warranting a timely warning should immediately report the circumstances to: 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:

- Campus Director, anja.ward@schiller.edu
- Campus Dean, 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.

EMERGENCY RESPONSE TEAM (ERT)

In the event of a significant emergency or dangerous situation involving an immediate threat to the health or safety of students or employees occurring on campus, the Emergency Response Team (ERT) is responsible for assessment and implementation of emergency procedures, including but not limited to, evacuations, lockdowns, crowd control, access controls, and coordination with responding emergency services. The ERT will assemble to direct the handling of the crisis.

The University has identified an Emergency Response Team (ERT), consisting of:

Campus Director: +49 (0) 6221 458120

Dean: +49 (0) 6221 458116

Registrar: +49 (0) 6221 458114

Librarian: +49 (0) 6221 458113

ORGANIZATIONAL STATEMENT, ROLES, AND RESPONSIBILITIES

This Safety Plan provides guidelines for the ERT during a major emergency or dangerous situation. Campus Director is considered the team leader.

The Team Leader or designee would be responsible for the following actions:

- Identifying the nature of the emergency.
- Ensuring that timely notification is made to emergency responders (*e.g.*, police and fire departments, emergency medical services, etc.).
- Coordinating with responding emergency services personnel.
- Ensuring that timely notification is made to the full ERT.
- Initiating the mass alert system if necessary.
- Ensuring that the primary command center is operational with all necessary communication and emergency equipment, as appropriate; and
- Determining if a lock down or evacuation of any building is necessary and initiating that process, if warranted.

•

DRILLS AND TESTING

Schiller International University's facility management schedules periodic fire drills. Every alarm must be taken seriously even if there is no immediate apparent danger. Every student will familiarize himself/herself with the rules and procedures. The rules and procedures for emergency response and evacuation will be published in conjunction with the scheduled drills. Students will use the following

procedures during fire drills, when the alarm sounds:

-
- Open the window blind/ shades
- Leave the wall or overhead light(s) on
- Close the room door, but DO NOT LOCK IT
- Walk quickly and quietly outside by using the stairwells. Do not use elevators.

Remain outside until the signal is given to return to the building

Students, staff and visitors are encouraged to notify the Campus Director at 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.

The 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.

REPORTING AN EMERGENCY

Reporting an emergency in an accurate and timely manner is crucial in minimizing the effect of a significant emergency or dangerous situation on the community. All alleged offenses and/or emergencies should be reported to the Campus Director. If a criminal act and/or emergency are reported to someone

other than the Campus Director, that person is instructed to contact the Campus Director immediately. The Campus Director or designee, upon receiving the initial report, and will act according to training and instructions given.

Contact numbers for emergency service units (Fire, Police, and Emergency Medical Services) along with government agencies (*e.g.*, Office of Emergency Management; Board of Health; Poison Control Center; and the National Response Center for Chemical, Oil and Chemical/Biological Terrorism) are maintained at the Campus Director's Office, and at the campus reception. Also listed are medical facilities, utility companies and on-call contractors are maintained along with emergency contact numbers for all current staff, faculty, and students. If you encounter an emergency or dangerous situation on campus, report it immediately to the Campus Director or call -110 for police support, or -112 for all other emergencies.

NOTIFICATION PROCEDURES

Upon receiving the initial report, the Campus Director will make an immediate assessment identifying the nature of the emergency or dangerous situation and notify emergency services to discuss what actions should be taken next. A member of the ERT will then be notified, who will brief the other members. If a mass notification or limited notification is deemed necessary by local emergency services, the ERT will, without delay, and taking into account the safety of the community, determine the content of the notification, and decide the appropriate segment or segments of the campus community to receive the notification. The ERT will assist the Campus Director in initiating 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. Members of the ERT will notify their respective departments via phone, text messaging, or e-mail to ensure that all faculty and staff are aware of the situation.

MASS NOTIFICATION

Emergency Notifications are required upon the confirmation of a significant emergency. It is sent by the President or designee, to all Students, Faculty and Staff via email and fire alarm system if applicable. Phone calls are made if needed.

All emergency notifications may be communicated through one or more of the following systems:

- Schiller website (www.schiller.edu)
- Blackboard Collaborate platform
- Email alert sent to Students, Faculty and Staff
- On Campus fire alarms

COMMUNICATION WITH THE CAMPUS COMMUNITY AND GENERAL PUBLIC

The ERT will determine the need to give notice to individuals and organizations outside the campus, including the police or other local authorities as well as the campus community. The ERT will collaborate with local authorities in determining the need for and content of the notice. The notice will be provided to local emergency services as a first priority. Updated information will be provided if necessary.

In the event of an emergency or dangerous situation, the University should be contacted on (+49) 06221 45810, or (+49) 06221 458120.

ROLE OF COMMUNITY

The community is encouraged to notify the Campus Director of a significant emergency or dangerous situation as soon as possible. All matters involving potential violence or circumstances that could harm students, faculty, or staff should be reported immediately to -110.

ROLE OF STUDENTS

Students should familiarize themselves with the emergency procedures and evacuation routes in buildings where they reside or use frequently. They should evacuate buildings in an orderly manner when an alarm sounds or when directed to do so by emergency personnel. They should evacuate to pre-designated Emergency Assembly Area.

ROLE OF FACULTY AND STAFF

Every member of the faculty and staff should familiarize themselves with the emergency procedures and evacuation routes. Faculty members who are teaching a class during an emergency situation are expected to assist the students in taking appropriate actions. University security facility management will provide communications and coordination with responders, under the direction of the ERT, as needed.

EVACUATION GUIDELINES

Notification to evacuate a building will be made by any feasible means, including email, fire alarms, public address systems, hand-held public address horns, telephones, and word of mouth as determined by the ERT.

In the event of a fire, employees, students, faculty, staff, and visitors are required to evacuate the building immediately. In non-fire emergencies, a decision to evacuate will be based on the facts and circumstances. Evacuation is likely necessary when the University receives a specific threat (e.g., bomb threat or hazardous material incident) and the recommendation of public safety officials who may be responders.

EVACUATION OF CAMPUS BUILDINGS

When the order is given to evacuate a building for any reason, occupants are instructed to follow life safety survival skills, to not to use elevators, and to evacuate by way of the nearest safe exit. In case of a fire, an automated alarm will notify everyone throughout the campus. A fire drill is organized by the facility management every year.

LOCK DOWN AND SHELTER-IN-PLACE PROCEDURES

The safety of our students, staff and faculty is a high priority and an important concern for the University. There is a fire alarm system in place for the immediate evacuation of the

campus during an emergency. Although our location makes this unlikely, the campus building facility management has a LOCKDOWN safety procedure (as described below), which can be used if and when there is an immediate threat and an evacuation would not be practical.

There are many types of threats and situations that can be dynamic and confusing due to unknown factors. We must therefore be flexible in how we communicate and react to keep everyone safe and out of harm's way.

For contacting **police call 110**, for fire, or medical emergency services **please call 112** - this call is free of charge and can be made from any telephone without unlocking access, and provide the address, building, and room location information displayed on the placard or phone.

If there is an immediate threat to human life, you must react decisively, get out of harm's way, notify the authorities by **dialing 110**, and if necessary, implement and use the fire alarm or the LOCKDOWN procedure. Once a campus official determines a lockdown, an announcement will be made to inform individuals on campus that **"Schiller International University is now in a LOCKDOWN condition."**

In the event of a Lockdown, the following procedures are to be followed:

- The doors to the building should be locked, and no one should be allowed to enter or leave until officially instructed.
- All students in the building should report to the nearest classroom.
- All professors should direct students in the hall to the nearest classroom, lock the doors and windows, turn off the lights, cover the windows, and move students out of the line of sight.
- Professors should take attendance of students in the room and await further instructions.
- Professors may contact the Front Desk but should understand that immediate response may not be possible.
- All activity should cease. Students are expected to be quiet and to limit movement.
- Students/Staff outside the building must evacuate to an off-campus location.

Once the lockdown is over there will be an announcement stating that the **"LOCKDOWN is OVER"** or, you will receive instructions from a University administrator, police, or a fire official. No one is allowed to leave the building until instructed. The staff is committed to

improving and encouraging good relations in a diverse cultural environment in the University. Our combined efforts can preserve a safe environment.

BOMB THREAT OR HAZARDOUS MATERIAL THREAT

Threats are always taken seriously. Most often a bomb threat is made by telephone, but threats may be conveyed by mail, email, or in person. Bomb threats must be reported immediately. Contact the Campus Director immediately. The Campus Director will contact the appropriate authorities. However, if the threat seems imminent, **call 110**. Security and designated personnel will coordinate with police and fire departments. A decision to evacuate or to lockdown a building will be made with due consideration given the advice offered by first responders.

If searches are necessary, professionals from the police and fire departments will conduct them. University personnel will not conduct searches for explosives or hazardous materials.

If Schiller or any of its employees were to receive a bomb threat by telephone:

- Remain calm. Do not hang up, even if the caller hangs up: The call may still be traceable.
- Ask the caller to repeat what he/she said.
- Ask for more information:
 - What is your name?
 - Where is it?
 - What does it look like?
 - What will it do?
 - Why are you doing this?
 - How can we contact you?
 - Do you want to talk with someone?
- Take notes.
 - What was the exact time of the call?
 - Was the caller male or female?
 - Did the person sound old or young?
 - Did the person have an accent or pronounce words in a strange way?
 - What was the caller's tone of voice? Was he/she calm or excited?
 - Was there identifiable background noise?

SERIOUS INJURY OR ILLNESS

Serious injury or illness can occur at any time. In the event of a serious injury or severe illness:

- Do not move the ill or injured person.
- Call 112 or call Campus Director.
- Security personnel will notify appropriate members of ERT.
- Trained personnel will give care until first responders arrive.
- Campus Director will file a report of the incident. University Administrative staff will follow up with the ill or injured person.

The Campus Director or Dean 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 the Campus Director, the University 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.

Method	Sign Up Instructions
Schiller website	www.schiller.edu
Alert notification to students	via blackboard and schiller.students.edu accounts
on campus alarm system	fire alarm

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.

Office Assistance / Campus Director maintains the record of these tests and training exercises, including dates, times and descriptions. The University uses these occasions to remind faculty, staff and students on the campus safety procedures.

The Campus Director / Office Assistant 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.

Missing Student Policy

Students, employees or other individuals should report that a student has been missing for 24 hours to the Campus Director, or any University administrator. Any missing student report will be referred immediately to the local law enforcement agency that has jurisdiction in the area.

In an emergency: **Call 112.**

Dorms facilities

Schiller International University Heidelberg rents apartments at two different locations close to campus. Each location has a facility management with an office on-site.

The dorm locations and contact persons are:

- a. Campus Viva, location: Langer Anger 44, 69115 Heidelberg – contact facility management: ProImmobilien Verwaltungsgesellschaft für Haus- und Grundbesitz mbH Zollhofgarten 8 - 69115 Heidelberg, phone 06221 4263655; contact security provider: Company Phoenix phone: 06224-9284002.
- b. Ringstrasse, location: Ringstrasse 37-41, 69115 Heidelberg - contact facility management: Hausverwaltung Optima GmbH, Alexandrastr. 15, 65187 Wiesbaden, Tel.: 0611-44838263

In addition, anybody can and should call the local police station for help: 110 (or fire department/ emergency: 112).

Students residing in on-campus housing have the option to identify confidentially an individual to be contacted by the University only in the event the student is determined to be missing for more than 24 hours. If a student has identified such an individual, the University will notify that individual no later than 24 hours after the student is determined to be missing. The option to identify a contact person in the event the student is determined missing is in addition to identifying a general emergency contact person, but they can be the same individual for both purposes. A student's confidential contact information will be accessible only by authorized campus officials, and it will only be disclosed to law enforcement personnel in furtherance of a missing student investigation.

A student who wishes to designate a confidential contact may do so by updating the FERPA document at the Registrars office.

After investigating a missing person report, if it is determined that the student has been missing for 24 hours, the University will notify local police authorities unless it was local law enforcement that made the determination that the student is missing. If the missing student is under the age of 18 and is not emancipated, the University will also notify that student's custodial parent or legal guardian within 24 hours of the determination that the student is missing, in addition to notifying any additional contact person designated by the student.

Crime Statistics

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

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

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.

Annual Fire Safety Report

Housing Facilities and Fire Safety Systems

The University maintains on-campus housing for its students. Below is a description of fire safety systems and the number of fire drills conducted during the previous calendar year.

Campus: Schiller International University – Heidelberg Campus, Zollhofgarten 1, Heidelberg, IT 69115

Facility	Fire Alarm Monitoring Done on Site	Partial Sprinkler System	Full Sprinkler System	Smoke Detection	Fire Extinguisher Devices	Evacuation Plans & Placards	Number of evacuation (fire) drills in previous calendar year
Campus Viva, Langer Anger 44, 69115 Heidelberg	X			X	X	X	1
Studentenwohnheim, Ringstrasse 37-41, 69115 Heidelberg	X			X	X	X	1

Policies on Portable Appliances, Smoking and Open Flames

The use of open fires, such as burning of such things as incense, and smoking are prohibited in student housing. Only surge-protected extension cords are permitted. Only the following portable cooking appliances are permitted to be used in campus housing: stove, toaster, microwave, etc.. Also, tampering with fire safety systems is prohibited and any such tampering may lead to appropriate disciplinary action

The University reserves the right to make periodic inspections of campus housing to ensure fire safety systems are operational and that the policy on prohibited items is being complied with. Prohibited items, if found, will be confiscated and donated or discarded without reimbursement.

Fire Evacuation Procedures

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 system (if one is nearby) as they leave. If circumstances permit at the time of the alarm, additional instructions will be given regarding where students and/or staff are to relocate. Call 112.

Fire Education and Training Programs

Fire safety education programs for all residents of student housing and all employees with responsibilities related to that housing are held at the beginning of each academic year. Their purpose is to: familiarize everyone with the fire safety system in each facility, train them on procedures to follow if there is a fire and inform them of the University's fire safety policies. Information about maps of each facility's evacuation route and any fire alarms and fire suppression equipment available in the facility are offered at the local facility management office. Any student with a disability is given the option of having a "buddy" assigned to assist him or her.

Reporting Fires

The University is required to disclose each year statistical data on all fires that occurred in on-campus student housing. When a fire alarm is pulled and/or the fire department responds to a fire, these incidents are captured. If you encounter a fire that presents an emergency situation, ensure your own safety and then please call 911.

There may also be instances when a fire is extinguished quickly and an alarm is not pulled or a response by the fire department was not necessary. It is important that these incidents be recorded as well. Therefore, if you are aware of such a fire, see evidence of one or hear about one, you should contact the Student Services - Housing at Student Services - Housing. When providing notification of a fire, give as much information as possible about the location, date, time and cause of the fire.

Plans for Future Improvements

The University periodically reviews its fire safety protections and procedures. At this time, it has no plans for future improvements.

Fire Statistics

Schiller International University – Heidelberg Campus

2021

No fires were reported in 2021.

2020

No fires were reported in 2020.

2019

No fires were reported in 2019.